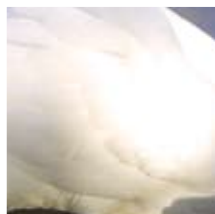


Sustainability Appraisal



**Sustainability Appraisal
Progress Report for the Core
Strategy Local Development
Document of Runnymede
Borough Council**

May 2009

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It is based on the information provided to and or held by Runnymede Borough Council including various other stakeholders.

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Contents

List of Tables	i
List of Figures	ii
List of Abbreviations	iii
1 Purpose of this Document	1
2 Introduction	2
Local Development Frameworks	2
Sustainability Appraisal & Strategic Environmental Assessment	2
3 Responses to the SA Scoping Report	5
Respondents	5
Summary of Responses	5
Sustainability objectives and indicators	6
Key sustainability issues.....	6
Draft plan objectives	7
4 Changes in Since the SA Scoping Report	8
5 Purpose of the DPDs	10
Runnymede Core Strategy DPD	10
6 Appraisal Methodology	11
Introduction.....	11
7 Summary of Level 1 & Level 2 Appraisals of the Policy Options	17
Summary of Findings from the Appraisal of the Proposals.....	18
Conclusions	19
8 Next Stages	20
Appendix 1 – List of SA/SEA Scoping Report Consultees	A1:1-1
Appendix 2 – Responses to Consultation on Scoping Report	A2:1-7
Appendix 3 – Level 1 Sustainability Appraisal of Options	A3:1-55
Appendix 4 – Level 2 Sustainability Appraisal of Policy Groups	A4:1-166
Appendix 5 – Example structure and contents of RBC’s CS SA Report	A5:1-1

List of Tables

Table 1 - SA Stages.....	3
Table 2 - SA Stage A Tasks	3
Table 3 - Key Sustainability Issues	6
Table 4 - Draft Core Strategy Objectives	7
Table 5 - RBC Core Strategy Policy Groups.....	10
Table 6 - Level 1 Interaction Summary	17
Table 7 - Interaction ID	17
Table 8 - L2 Progress Summary	Error! Bookmark not defined.
Table 9 - SA Stages B and C.....	20

List of Figures

Figure 1 - The DPD/SA Preparation Process	3
Figure 2 - Runnymede Borough Council IA Methodology Outline	11

List of Abbreviations

Term	Description
AAP	Area Action Plan
AMR	Annual Monitoring Report
BAP	Biodiversity Action Plan
BREEAM	Building Research Establishment Environmental Assessment Method
BVPI	Best Value Monitoring Report
CABE	Commission for Architecture and the Built Environment
CEH	Centre for Ecology & Hydrology
CIL	Community Infrastructure Levy
CPRE	Council for the Protection of Rural England
CS	Core Strategy
CSH	Code for Sustainable Homes
DCLG	Department of Communities and Local Government
DEFRA	Department for Environment, Food and Rural Affairs
DERA	Defence Evaluation research Agency
DfT	Department for Transport DPD- Development Plan Document
DPD	Development Plan Document
DPH	Dwellings per Hectare
EA	Environment Agency
EH	English Heritage
ELR	Employment Land Review
ER	Environmental Report
GI	Green Infrastructure
GOSE	Government Office for the South East
GTAA	Gypsy Traveller Accommodation Assessment
HA	Highways Agency
IRF	Integrated Regional Framework
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Scheme
LF	London Fringe
LNR	Local Nature Reserve
LPA	Local Planning Authority
LSP	Local Strategic Partnership
LTP	Local Transport Plan
MDS	Major developed Site
MGB	Metropolitan Green Belt
MoD	Ministry of Defence
NE	Natural England
NERC	Natural Environment Research Council

Term	Description
ODPM	Office of the Deputy Prime Minister
PDL	Previously developed Land
PINS	Planning Inspectorate
PPG	Planning Policy Guidance
PPG	Planning Policy guidance
PPP	Plans, Policies and Programmes
PPS	Planning Policy Statements
PPS	Planning Policy Statement
PSA	Public Service Agreement
RBC	Runnymede Borough Council
RE	Regional Economy
RSF	Regional Sustainability Framework
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SANGS	Suitable Alternative Natural Green Space
SAP	Standard Assessment Procedure
SCC	Surrey County Council
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SEEDA	South East England Development Agency
SEERA	South East England Regional Assembly
SEP	South East Plan
SFRA/FRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SNCI	Site of Nature Conservation Importance
SPA	Special Protection Area
SPD	Supplementary Planning Document
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage System
TBHSPA	Thames Basin Heath Special Protection Area
TC	Town Centre

1 Purpose of this Document

- 1.1 The Government through the requirements of S39 (2) of the Planning and Compulsory Purchase Act 2004 made sustainable development central to its reform of the planning system. The purpose of Sustainability Appraisal (SA), was made mandatory under S19(5) of the same 2004 Act, and has been intended to promote sustainable development through the integration of social, environmental and economic considerations into the preparation and revisions of Development Plan Documents (DPD) and Supplementary Planning Documents (SPD). Runnymede Borough Council's (the Council) Core Strategy (CS) is a DPD and therefore caught by the requirements of this act.
- 1.2 In addition, when preparing the new DPD, the Council must also conduct an environmental assessment in accordance with the requirements of European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the Strategic Environmental Assessment or 'SEA Directive'), transposed by virtue of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.3 In essence the Government's requirements can be met by preparing the SA over two key stages;
 - the production of a Scoping Report setting out the scope of the Sustainability Appraisal; and,
 - the production of a Sustainability Appraisal Report.
- 1.4 On the 24 June 2008 the Council published for consultation its Sustainability Appraisal Scoping Report as the first formal stage of consultation in the Sustainability Appraisal process of its LDF.
- 1.5 Government guidance requires Local Authorities to make available information on the progress of the sustainability appraisal of their DPDs. Therefore, this Sustainability Appraisal Progress Report is intended to report on that progress. It includes the findings of the initial SA work carried out in respect of the Council's CS DPD to date. Thus, it reports on the findings to date of the Level 1 and any Level 2 assessments carried out by the Council's Impact Assessment Team.
- 1.6 These assessments identify key interactions and likely impacts of each draft policy approach against the range of sustainability objectives, which are directly aligned to the Regional Sustainability Framework (RSF), SA objectives cover a range of social, environmental and economic interests that contribute towards sustainability and sustainable development. This report sets out progress which is made towards production of the Sustainability Appraisal Report to be published for consultation with the CS DPD. The final version of the SA Report will accompany the submitted CS DPD. This progress report will help develop the Council's understanding of which policy options are the most sustainable.
- 1.7 For completeness, this report includes some background work previously set out in the June 2008 Draft Scoping Consultation Report. It therefore reports on responses made to that consultation and any changes to the Plans, Policies, and Programmes Report, or the Baseline Data Report since the issue of the final scoping report in November 2008. It is therefore intended that this document will provide useful additional background information for those wishing to be involved in the current CS DPD consultation exercise.

2 Introduction

Local Development Frameworks

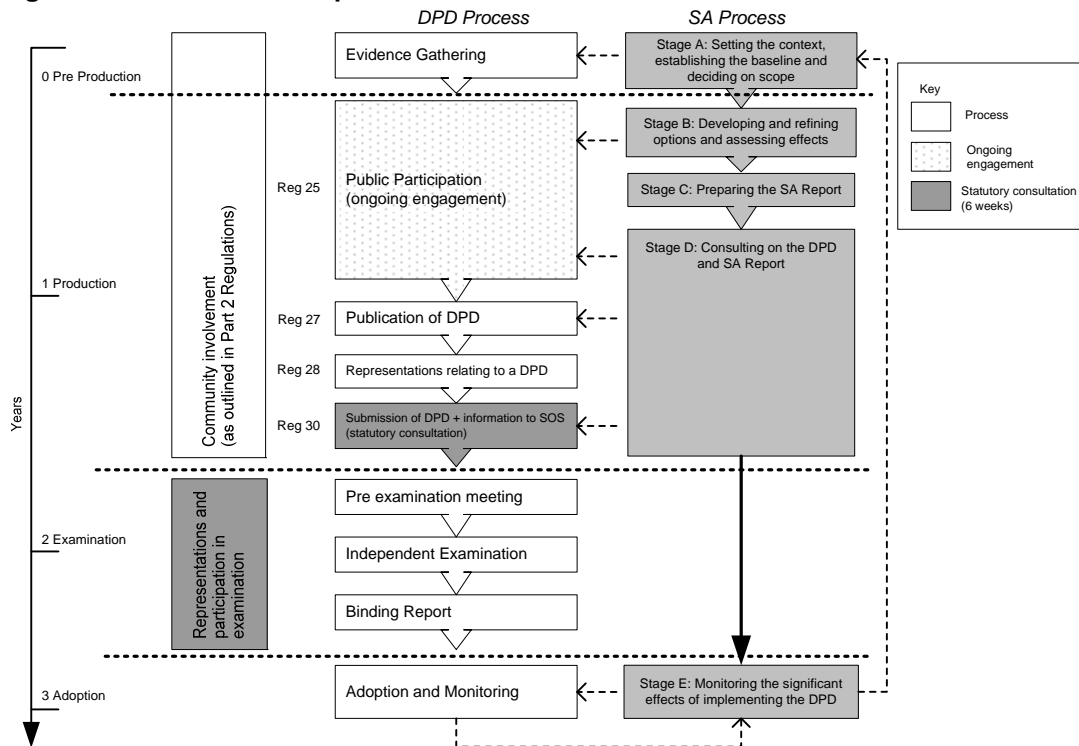
- 2.1 In 2004 the Government introduced a new plan making system under the provisions of the Planning and Compulsory Purchase Act 2004. Accordingly, the Council is now in the process of replacing its adopted Local Plan with a new Local Development Framework (LDF), which will form part of the new development plan to guide development in the Borough for the period up to 2026. The LDF also includes the Local Development Scheme (LDS), which sets out details of the plan making process and the Council's proposed timetable, and the Statement of Community Involvement (SCI), which sets out the how the Council will consult throughout the process, neither of which form part of this consultation.
- 2.2 The key components of the Local Development Framework are the Local Development Documents (LDDs) of which there are two main types – Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). Runnymede Borough Council has commenced production of the Runnymede Core Strategy DPD.

Sustainability Appraisal & Strategic Environmental Assessment

- 2.3 The purpose of Sustainability Appraisal (SA) is to ensure that the principles of sustainable development are fully taken into account when preparing relevant plans such as the Runnymede LDF. The SA identifies and reports inter alia on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives of sustainable development. The main objective is to integrate sustainability objectives into plan making and to produce better, more sustainable plans as a result.
- 2.4 In addition, pursuant to the requirements of the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (The Strategic Environmental Assessment Directive, (SEA)), specific types of plans must be subject to a strategic environmental appraisal. The requirements of the directive have been implemented in England by the Environmental Assessment of Plans and Programmes Regulation 2004 (SEA Regulations). Meeting the regulations involves the systematic identification and evaluation of the significant environmental impacts of qualifying plans. The Regulations came into force on 20 July 2004 and apply to a range of plans including Local Development Frameworks. As such the “*Runnymede Development Plan – Core Strategy DPD*” is therefore automatically captured by the regulations.
- 2.5 SA extends the concept of SEA to fully encompass economic and social concerns in addition to environmental issues. Under the Planning and Compulsory Purchase Act 2004 local authorities must undertake an SA for each of their Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) as part of a fully integrated process. The Government's approach has been to incorporate the requirements of the SEA Directive into the wider SA process as a statutory requirement.
- 2.6 In November 2005 the Government published its guidance on the preparation of SA for LDFs and how this process would interface with the DPD process. Initially, the guidance advocated a four-stage DPD approach that interacts with a five-stage SA Process. Recently, the Government amended the DPD process and this amendment

has been accommodated with in Figure 1 below. The Council has followed this process in undertaking the preparation of its Core Strategy DPD.

Figure 1 - The DPD/SA Preparation Process



Source: Modified ODPM, 2005, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities, London, 2005.

2.7 The Government's guidance on the preparation and undertaking the SA advocates a five-stage approach to the process of SA, as outlined in Table 1.

Table 1 - SA Stages

SA Process Stages
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
Stage B: Developing and refining options and assessing effects
Stage C: Preparing the Sustainability Appraisal Report
Stage D: Consulting on the preferred options of the DPD and SA Report
Stage E: Monitoring the significant effects of implementing the DPD

2.8 Stage A consists of six key tasks as outlined in Table 2 below. This stage culminates in the production and consultation of the Scoping Report at Task A5.

Table 2 - SA Stage A Tasks

DPD Stage 1: Pre-production – Evidence Gathering
A1 – Identifying other relevant policies, plans and programmes, and sustainability objectives.
A2 – Collecting baseline information.
A3 – Identifying sustainability issues and problems.
A4 – Developing the SA framework.
A5 – Consulting on the scope of the SA.

- 2.9 The SA Scoping Report in combination with the Core Strategy Issues and Options was published for consultation on the 24th June 2008. Its purpose was to set out the findings of the first stage of the process (Stage A) for a Sustainability Appraisal of the relevant Runnymede Local Development Documents (LDDs). It was sent to the three statutory consultation bodies for comment as required by SEA Regulation 2004. In addition, this report was sent to a number of other key stakeholders and interested parties (listed in Appendix 1). The consultation ran for a five-week period and concluded on the 25 July 2008.
- 2.10 Specific consultation questions were included, both within the document at the end of each section, and on a separate form, to assist consultees with their responses. The document was also placed on the Council's web site and an on-line response form was available for direct submission of comments.
- 2.11 Following the consultation on the Scoping Report the Council received 8 responses which have been duly considered and reported upon in Appendix 2 and summarised the next section of this report.

3 Responses to the SA Scoping Report

Respondents

- 3.1 The Council undertook an Issues and Options consultation on the Core Strategy under the Town and Country Planning Regulations 2004 in summer 2008. The Regulations were subsequently amended and a public participation consultation Core Strategy has now been produced and is now the subject of this Level 1 and 2 SA.
- 3.2 Of approximately 770 consultees invited to respond to the Issues and Options consultation, responses were received from approximately 150. All comments received were generally supportive of the direction being proposed and the options being considered. A number of constructive comments made have been taken into account in refining policy objectives and preparing for this consultation. A full list of the comments received on the CS DPD has been reported to committee. The Council's response in respect of the SA Scoping report is set out in Appendix 4, and the main points summarised below.

Summary of Responses

- 3.3 There were a number of important elements of the scoping report on which comments were sought: -
- a) The contents and relevancy of a draft list of the Plans, Policies and Programmes including: international; national; regional; county; and, local. This list included guidance and the emerging South East Regional Plan;
 - b) The contents and relevancy of a draft list of Baseline Data;
 - c) Draft sustainability objectives and indicators against which the plan will be assessed;
 - d) A draft list of the Key Sustainability Issue (KSIs) arising from background research so far, other plans, policies and programmes (including national guidance and the emerging regional plan) and matters from the Summer 2008 Issues and Options consultation.
- 3.4 The responses to the Scoping Report have been used to produce a revised "final" Scoping Report document. These continue to be used to inform the process of refining the sustainability objectives, the indicators and the plan objectives as we move forward with further stages of public consultation on the Core Strategy DPD "Issues and Options" document.
- 3.5 Whilst there will be no complete report produced until the Final Sustainability Appraisal Report, it is necessary to fully document the sustainability process to ensure that it is transparent and that appraisal information is readily available for the public and other consultees. A number of amendments and refinements arising from the consultation on the Scoping Report have been incorporated when the responses to the current Options consultation are considered.
- 3.6 A number of respondents have identified further documents which need to be considered under the assessment of plans, programmes and policies (PPPs). Some of these are new national and strategic documents published since the preparation of the list set out in the scoping report. All additional documents suggested by the

consultees or identified as part of a regular internal PPP review will be evaluated to establish which further documents the plan and the SA need to consider.

Sustainability objectives and indicators

- 3.7 There was general agreement that the sustainability objectives were appropriate and fit for purpose. However, where suggested amendments to improve the clarity of some particular objectives have been made, the suggestions have been duly considered and reaction reported. Some respondents suggested new or revised sustainability objectives which they felt would be more appropriately considered as plan objectives or policies and these suggestions have also been noted.
- 3.8 The list of sustainability indicators attracted some particularly useful responses which will assist in refining key indicators and ensuring that baseline data and monitoring information is kept up to date and relevant to the SA & CS DPD objectives.

Key sustainability issues

- 3.9 A number of key sustainability issues (KSI) have been identified for the SA as part of the SA framework. These have been identified by virtue of the outcome of an analysis of how relevant indicators are performing within the context of the Borough, County, Region or Nationally and whether actions taken within Runnymede could reasonably be expected to have a significant effect on trends. At present 13 KSIs have been identified and outlined in Table 3 below:

Table 3 - Key Sustainability Issues

KSI	RSF	RSF Title
1.	1.	To ensure that everyone has the opportunity to live in a decent sustainably constructed home suitable to their need
2.	2.	To improve the health and social well being of the population and reduce inequalities in health
3.	3.	To reduce poverty and social exclusion and by improving the performance, close the gap between the most deprived areas in the South East and the rest of the region
4.	5.	To reduce crime and perceptions of disorder
5.	11.	To stimulate economic revival in deprived areas
6.	14.	To improve efficiency in land use through the appropriate re use of previously developed land and existing buildings including re use of materials from buildings and encourage urban renaissance
7.	15.	To reduce the risk of flooding and the resulting detriment in public well being , the economy and the environment
8.	18.	Ensure that the South East is prepared for the impacts of climate change
9.	19.	To conserve and enhance the regions biodiversity
10.	21.	To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel
11.	23.	To reduce waste generation and disposal and achieve the sustainable management of waste
12.	24.	To maintain and improve the water quality of the region's rivers , ground waters and coasts and to achieve sustainable water resources management
13.	25.	To increase energy efficiency, security and diversity of supply and the proportion of energy generated from renewable sources in the region

Draft plan objectives

3.10 Draft Core Strategy objectives are listed below in Table 4 below.

Table 4 - Draft Core Strategy Objectives

1.	To make best use of previously developed land (PDL) in the urban areas of Runnymede, particularly Addlestone, Chertsey and Egham.
2.	To create a vibrant and sustainable new community at the former DERA site, Longcross.
3.	To provide sufficient housing in Runnymede's urban areas to help deliver regional housing targets and meet the needs of local people.
4.	To support the local economy for the future benefit of businesses, residents and those who work in Runnymede.
5.	To protect existing well located employment areas within Runnymede.
6.	To protect and enhance the vitality and viability of the retail centres of Addlestone, Chertsey, Egham and Virginia Water within Runnymede.
7.	To protect and enhance Runnymede's open spaces for recreational, leisure and tourism purposes while conserving their biodiversity.
8.	To protect and enhance the Green Belt so as to maintain openness and visual amenity, and to prevent urban sprawl and the coalescence of Runnymede's urban areas.
9.	To manage and mitigate the flood risk that is faced by people and property particularly in the areas of Addlestone, Chertsey, Egham and Thorpe.
10.	To conserve, protect and enhance Runnymede's natural and historic environments.
11.	To ensure that all new development in Runnymede is of high quality design and complements and improves the character and the quality of the built environment.
12.	To help tackle the causes and effects of climate change, encouraging sustainable construction, energy efficient design, renewable energy provision, sustainable travel and recycling.
13.	To ensure that the physical and social infrastructure needed to support new development is provided in a timely fashion.
14.	To promote the use of public transport, cycling and walking and reduce the need to travel, ensuring that new development is sustainably located.
15.	To protect natural resources and minimise the effects of all forms of pollution on the local community and the environment.

3.11 Runnymede Borough Council's vision from which the objectives of this strategy has been prepared is: -

"Over the next 20 years Runnymede will grow in a sustainable manner that protects the Green Belt and conserves and enhances the quality of its natural and built environment. We foresee places and communities with thriving economies, good quality affordable housing, quality spaces and attractions for public use, and good accessibility by public and private transport. Sustainable approaches to development will protect the environment and provide the social and physical infrastructure needed to ensure that the high quality of life of residents is maintained and enhanced."

4 Changes in Since the SA Scoping Report

4.1 Since the issue of the SA Scoping Report in November 2008, the following PPPs have changed:

- The Historic Environment : A Force for Our Future (Published: 2001) (New document added to PPP list)
- The Cultural Cornerstone: A Strategy for the Development of Cultural Activity and its Benefits for the South East (Published: 2005) (New document added to PPP list)
- The Cultural Agenda : Realising the Cultural Agenda of the South East (Published: 2002) (New document added to PPP list)
- Mission Possible : The South East Plan for Sport (Published: 2004) (New document added to PPP list)
- Thames Waterway Plan (Published:2006) (New document added to the PPP list) (New document added to PPP list)
- Thames Corridor Catchment Abstraction Management Strategy (Published: 2004) (New document added to PPP list)
- UK Communication Strategy for Climate Change (Published: 2005)
- Equality Act (Published: 2006) (New document added to PPP list)
- Surrey Supporting People Strategy (Published: 2008) (New document added to PPP list)
- PPS4 Planning for Sustainable Economic Development (Published: 2008) (New document added to PPP list)
- The South East Plan (Published: 2009) (Final version of draft document published)

4.2 In addition, the following Baseline Data has changed: -

- Households on the housing register (New data available)
- Number of non-decent homes per 1,000 dwellings (New data available)
- Early death rates for circulatory disease , cancer , accidents and suicide (New data available)
- Infant mortality rates (New data available)
- Under 18 conception rate (New data available)
- Proportion of children in poverty (New data available)
- Percentage of population who live within the most deprived 20% of areas in the country (Indices of Multiple Deprivation) (New data available)
- Proportion of adults with poor literacy and numeracy skills (New data available)
- 16-18 year olds who are not in education , training or employment (New data available)
- Level of serious violence and serious acquisitive crime (New data available)
- Perceptions of anti social behaviour (New data available)
- Overall employment rate (New data available)
- Number of income support claimants in the 20% most deprived areas(New data available)
- Properties at risk of flooding (New data available)

- Designated heritage assets (New data available)
- Growth in road traffic volume (New data available)
- Regional ecological footprint(New data available)
- Total types of all waste arising and method used for its management (New data available)
- Rivers of good or fair chemical and biological water quality(New data available)
- Installed capacity for energy production from renewable sources(New data available)

5 Purpose of the DPDs

Runnymede Core Strategy DPD

- 5.1 The Runnymede Local Development Framework (LDF) will set out all policies and plans relating to development in Runnymede for the next 20 years. The Runnymede Core Strategy will form the strategic planning policy guidance for the Borough once it is finally adopted. This forms an important element of the Local Development Framework which will consist of a number of documents setting out policies and principles which will be applied throughout the Borough and will replace the Local Plan.
- 5.2 The Core Strategy is at Public Participation Stage, where the Borough Council is setting out the main Policy approaches that it thinks it should adopt to enable and control development in the Borough for the next 20 years. It contains 18 separate policy groups listed in table 5 below.

Table 5 - RBC Core Strategy Policy Groups

No.	Policy Group
1.	Location of development
2.	Housing delivery
3.	Affordable housing
4.	Housing size and type
5.	Community infrastructure and services
6.	Green belt
7.	Design
8.	Protecting and enhancing the natural environment
9.	Tourism, recreation and leisure
10.	Sustainable Transport
11.	Gipsy and travelling populations
12.	Sustainable Design and Construction
13.	The former DERA site, Longcross
14.	Thames Basin Heath Special Protection Area
15.	Town Centres
16.	Development and flood risk
17.	Employment development
18.	Housing density

- 5.3 In addition to the policy groups mentioned above, the Core Strategy document includes a key diagram and will be accompanied by a Proposals Map that identifies in more detail where development will take place and the environmental and infrastructure requirements that will need to be met.

6 Appraisal Methodology

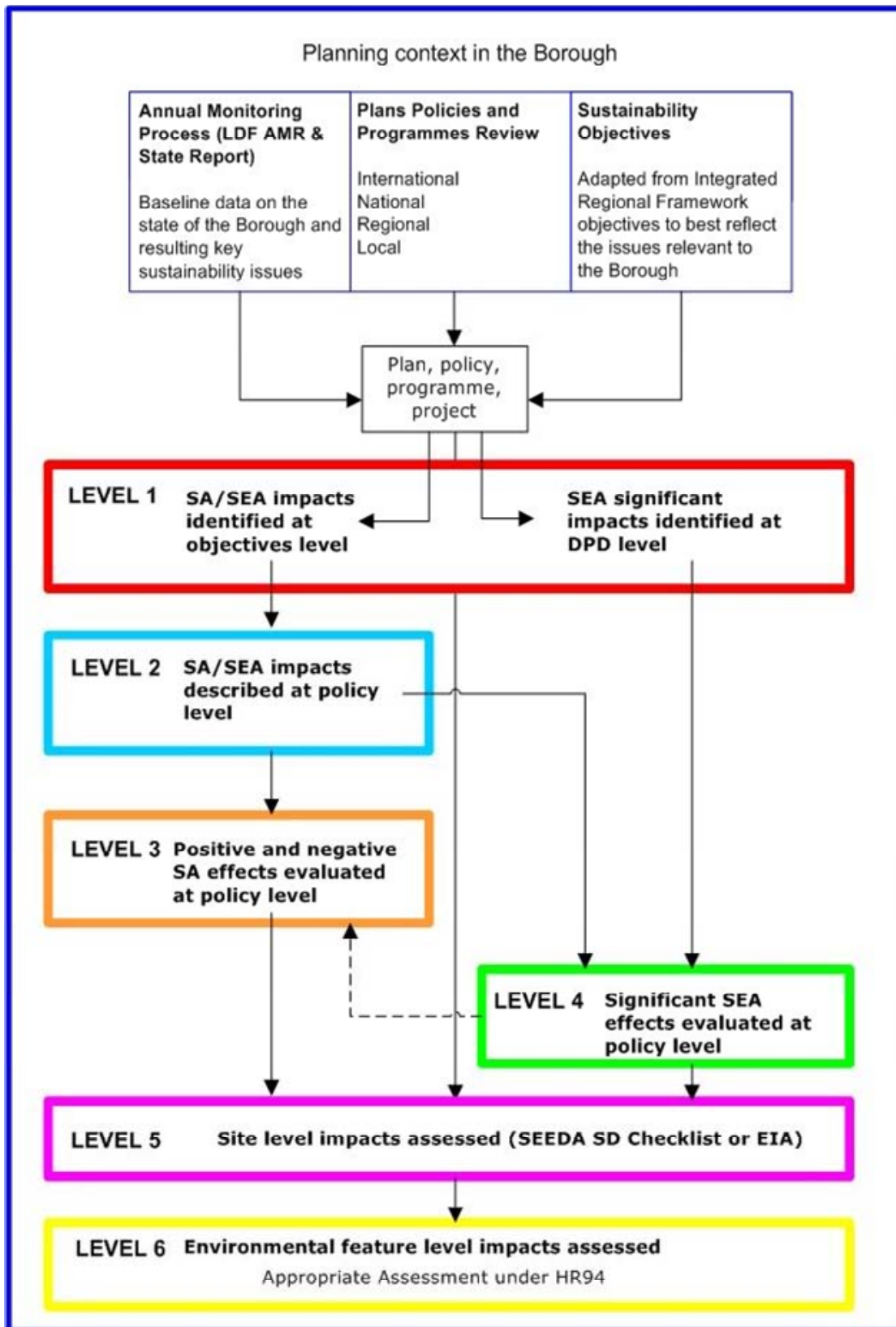
Introduction

- 6.1 The following chapter briefly describes the methodology used to assess the effects of the implementation of Development Plan Documents (DPD) that forms a component of Runnymede Borough Council's LDF. The assessment methodology incorporates an integrated approach to impact assessment and has been designed to function within a continuously changing planning and monitoring context. The Runnymede State Report 2004 commenced the formal assembly by the Council of baseline data. Plans, policies and programmes are continually reviewed to ensure relevancy. The sustainable development objectives against which the DPDs policies are appraised have recently been updated and now reflect the Regional Sustainability Framework (RSF)¹.
- 6.2 The methodological approach developed by the Council has deliberately been devised to be an integrated approach, in that it forms the basis of all the work carried out by the Council's Impact Assessment Team. Its six level assessment procedure incorporates assessments ranging from a low Level 1 – scoping assessment of a plan or project to a highly detailed Level 6 – feature level assessments, of a kind that would be required pursuant to Regulation 48(1) of the Conservation (Natural Habitats &c.) Regulations 1994 (as amended). The method is outlined in Figure 2 - Runnymede Borough Council – Impact Assessment Methodology as it relates to policy assessment.
- 6.3 Specifically, the SA framework methodology being used for the appraisal and monitoring the implementation of the CS was referred to in the Scoping Report. As the Scoping Report points out, the Council's sustainability objectives were aligned with the Integrated Regional Framework (IRF)², however, following an update, the IRF has now been replaced by the Regional Sustainability Framework (RSF). The Council's sustainability objectives are re-aligned with the new RSF objectives, which are considered to be broadly similar to those in the IRF. The RSF objectives are listed in Appendix 1 and 2. The list of objectives is common to the assessment process of both the SA and SEA process at this stage.
- 6.4 The sustainability objectives describe different aspects of sustainability, that it is assumed when achieved together should result in a sustainable Borough. However, obviously some objectives are more compatible than others to the situations found within Runnymede and an internal interaction matrix was produced to describe these. This has been assessed so that potentially positive and negative interactions between the objectives can be managed at the assessment stage and these are identified in the Key Sustainability Issues shown earlier in this report in Table 3.
- 6.5 The following describes the methodology used to assess significant effects of the implementation of the DPD's that forms the Runnymede Borough Council's LDF. The assessment methodology is intended to function within an adaptive planning and monitoring context.

¹ Copies of the RSF can be obtained at: http://www.southeast-ra.gov.uk/sustainability_rsf.html

² The Integrated Regional Framework (IRF) that sets the context for sustainable development in the South East of England: http://www.southeast-ra.gov.uk/our_work/planning/sus_dev/irf.html

Figure 2 Runnymede BC IA Methodology Outline



Level 1 Assessment – Scoping

- 6.6 All policies are subjected to a Level 1 Assessment. This commences with an officer assessment of potential interactions, assuming all other objectives were realised. Each of the interactions identified is described in an interaction matrix, whether positive, negative, or neutral. Those identified to have an interaction with one or more sustainable development objectives will have an accompanying description that documents the assessor's rationale for the conclusion. It must be pointed out that Level 1 Assessments' are by their nature 'quick', and only intended to provide a focus for subsequent provisionally more detailed assessments. With this in mind it will not be unusual for an interaction to change, or be de-notified in later stages of the assessment.

Level 2 Assessment – Impact ID

- 6.7 Initially, the Level 1 compatibility matrices will have identified an exhaustive descriptive list of interactions the plan objectives / policies will have with the sustainability objectives of the Borough, which will be followed by a Level 2 assessment. This level of assessment is more detailed and triggered once a Level 1 assessment has concluded that the objectives/policies that form the basis of planning policy have the potential to affect the sustainability of the Borough. This is intended to identify whether all the relevant Council SA objectives can be realised from the plan. In the instance where all relevant objectives are being met, then there will be no recommendation for change. However, where this is not the case, the Level 2 assessment will include recommendations for the plan to be modified to ensure greater positive relevancy to SA objectives.
- 6.8 The output of a Level 2 assessment, in most cases will include an Impact Assessment Matrix (IAM) for each of the impacts and or effects identified in Level 1. The IAM includes a brief description of the anticipated effect. This output forms the gap analysis that tests the potential for each sustainability objective to be realised from the plan. In addition, cumulative effects are identified and described. The conclusion of a Level 2 assessment may trigger a Level 3, Level 4, Level 5, and/or a Level 6 assessment.

Level 3 Assessment - SA

- 6.9 A planning policy that has the potential to affect the sustainability of the Borough and has been described at Level 2 and that does not trigger Level 4 assessment directly will be assessed at Level 3. A Level 3 assessment will in the main only consider impacts identified and described in Level 2 where they are deemed to be significantly beneficial or significantly adverse to the sustainability objectives of the Borough. In the case where the significant effect is described, and is well understood through data and/or precedent it can be quantitatively evaluated and thresholds established using qualitative threshold assessments.
- 6.10 Where the effects described are not sufficiently well understood through data or precedent and cannot quantitatively be evaluated, a further more detailed investigation will be undertaken, guided by the following set of key questions:
- what is the evidence base?
 - what assumptions have been made in determining this impact? and,
 - is there any precedent or literature that indicates the impact's severity or likelihood?

- 6.11 Following the outcome of these questions, a recommendation if appropriate will be made that research is conducted to allow impact evaluation to be carried out.
- 6.12 Clearly, the important requirement to carry out a Level 3 assessment will be that baseline data including trend data, precedent policy or similar policy is actually in existence and available to the assessment team. In the event that this requirement is not met, the assessment team will conclude the assessment based on the principles of risk analysis.
- 6.13 In the event that the impact as evaluated has a potential for a negative impact on the sustainability of the Borough, a statement recommending mitigation measures to be introduced and monitored will be produced.
- 6.14 In the event that the impact identified is not considered either to have a significant negative or positive effect, the impact will be monitored as part of the Runnymede State Report and or in the Annual Monitoring Report of the LDF.
- 6.15 Where an impact has been evaluated to have a significantly positive effect on the sustainability of the Borough, a statement, and if appropriate a recommendation of enhancement measures will produced. Again the impact will be monitored as part of the Runnymede State Report and/or the Annual Monitoring Report of the LDF.
- 6.16 At all stages throughout Level 2 and Level 3 assessments where data is lacking or missing, and/or assumptions are being made, a data and process risk assessment will be used to evaluate assumptions.
- 6.17 The output of this assessment can include any of the following answers to the following Key questions;
- What is the evidence base?
 - What assumptions have been made in determining the impact?
 - Is there any precedent or literature that indicates the impact's severity or likelihood?
 - It can also include a sustainability threshold assessment; and,
 - Mitigation options tables expressing key positive and negative effects of the plan, policy or project, and the potential for enhancement or mitigation according to the threshold criteria.

Level 4 Assessment - SEA

- 6.18 Level 4 assessments for plans are triggered as a result of either Level 1 or Level 2 assessment or by virtue of a Regulation 9 determination from a statutory authority or where a Level 2 assessment that has triggered a Regulation 9 significance criteria and adverse or strongly adverse effects has been determined. All opinions must be accompanied by supporting evidence of the significant detrimental effect on the environment on the factors listed within the Regulation 9 Table, including an assessment of 'likely to occur'. However, the data may not be quantitative in nature. A level 4 assessment supports Level 3 assessments but is unlikely to be triggered by it. The output from this assessment is a significant SEA effect evaluation at policy level including:
- Scenario development;
 - Investigation of alternatives; and,
 - Mitigation options and consultation with Officers on opinion of significant effects and the scope for mitigation.

- 6.19 A Level 4 assessment is effectively a SEA assessment under the Regulations. In order for a Level 4 assessment to be triggered, the impacts would have been described at Level 2. Consultees would also have advised of the likelihood of a significantly negative effect and may have supported this advice with data. If the data is available to support this conclusion, a Regulation 9 determination of significant negative effect would be carried out. In the event that the consultees have been unable to support their conclusions of a significant negative effect with data, the impact would be described so that adequate monitoring could be undertaken as part of the Runnymede State Report and or the AMR. A risk assessment would also be carried out to assess the risk of the assumptions and the lack of data. It is also possible to determine the significance of the negative effect in the absence of supporting data using significant criteria or a significant table. The output of this will also lead to a Regulation 9 determination of significant negative effect.
- 6.20 Where the effects described are sufficiently well understood, through data and/or precedent, it can be quantitatively evaluated using quantitative threshold assessments. A statement recommending measures of mitigation and/or monitoring would be produced. Where the impacts evaluated have the potential for significant negative effect on the Borough, a scenario development and or multi-criteria decision analysis tools would be used to clarify the negative effect and the potential for focused mitigation to all audiences for consultation.
- 6.21 In the event that the impact evaluated has no potential for significant negative impact on the Borough, and the impact could be monitored adequately through the State Report and AMR, then no recommendation for further monitoring will be produced. In the event that the impact evaluated has no potential for significant negative impact on the Borough and will not be monitored adequately through the State Report and/or AMR then a recommendation will be made that a risk assessment must be carried out to look at the impact of the lack of data and/or monitoring.
- 6.22 At this level impacts can also be evaluated using qualitative data assessment and using the key questions as described earlier. In the event where the impacts or effects are not sufficiently well described or understood through data and/or precedent then the assessment using qualitative data analysis techniques will be used. Where this is not the case or not possible a recommendation will be made that research is needed to allow impact evaluation.

Level 5 Assessment – Environmental Impact Assessment

- 6.23 A Level 5 assessment is considered to be a site specific level assessment that could, but not exclusively, be triggered as a result of Level 3 or a Level 4 assessment. A Level 5 assessment could be triggered as a result of a project being submitted for consideration by the Council from a developer. In this way, level 5 assessments are inevitably site specific assessments that will either use EIA procedures in the case of projects, or SEEDA's sustainability check list in the case of plans as the basis for their assessment methods.
- 6.24 In terms of sustainability appraisal, the SEEDA Sustainable Development (SD) Checklist second iteration will be used. It is expected that the alignment of strategic assessment of sites identified as having development potential at this stage, with the checklist, will make development control appraisal using the SEEDA SD Checklist (the Checklist) more straightforward. The Checklist has the potential to be locally weighted using the State Report data and local agreed SD objectives that will make its deployment at either strategic, outline or detailed planning application stages more straightforward.

- 6.25 An assessment of development achievements will be based on data related to developments approved in combination with other data within the Runnymede State Report and AMR. It will then be used to develop and fix a Standard Assessment Development Profile (SADP). The SADP would be generated so that it could be assessed utilising a specific set of questions closely aligned to the L5 Checklist. The answers to these questions will be supported using local data already within the Council. For example, development densities can be assessed using what has actually been achieved through development approved by the Council, development proximity to transportation nodal points, and development proximity to services. This data is obtainable and analysed using the Council's in-house GIS. The Checklist would then be run for all identified potential development sites and the results would be evaluated and fed back to the plan makers and consultees.
- 6.26 There is a higher level of data and information requirements in order to carry out a Level 5 assessment. One would expect it to be similar to the information and data required to make an assessment under EIA Regulations for projects.
- 6.27 In terms of environment, assessments at Level 5 would have triggered site specific policies or constrains that had potential for adverse effects on the receiving environment. As such the methodology will closely follow procedures pursuant to the relevant regulations within the Town and Country Planning (Environment Impact Assessment) (England and Wales) Regulation 1999 (SI 1999 No293).

Level 6 Assessment – Appropriate Assessment

- 6.28 In order for a Level 6 plan or policy assessment to be triggered, Levels 4 and 5 and possibly a Level 3 would have been triggered and concluded. A Level 6 assessment is the most detailed level of assessment that can be carried out by the Council. It is referred to as a feature level assessment under Regulation 48 – 53 the Conservation (Natural Habitats &c.) Regulations 1994 or Regulations 85A, 85C and 85E of the Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007. What follows is a brief outline in order to provide context to what is a very complex process.
- 6.29 The assessment will only be triggered where there is a likelihood of a significant effect to environmental features of European importance as a result of the plan or project alone or in combination with other plans or projects.
- 6.30 The assessment will then take place where the plan or project policy is not directly connected with or necessary to the management of the site's nature conservation objectives.
- 6.31 The site-specific policy or project that has a potential to affect environment features of European importance would be identified and described. The information requirements in order to carry out a Level 6 assessment can be both onerous and detailed. Due to the technical nature of this assessment additional detail will be provided on the methodology being used at a later stage.
- 6.32 The Authority must be able to ascertain “**no adverse affect on the integrity of the Natura 2000 feature**” in order to permit the plan to go ahead.

7 Summary of Level 1 & Level 2 Appraisals of the Policy Options

Summary of Initial findings of the policy options

Level 1 Review Summary

- 7.1 A Level 1 assessment against all 25 RSF Objectives was carried out and reported to the policy team for all original policy sets. Table 6 details the interactions identified as a result of this assessment.

Table 6 - Level 1 Interaction Summary

Policy	Interaction Type				Total Interactions
	+VE	?+VE	-VE	?-VE	
1. Locational Principles	7	8	0	1	16
2. Housing Numbers	2	6	0	6	14
3. DERA	4	4	0	0	8
4. Employment Development	7	12	0	9	28
5. Retail Development	16	18	0	0	34
6. Community Infrastructure and Services	6	7	0	0	13
7. Housing Density	3	0	0	0	3
8. TBH SPA	13	0	5	1	19
9. Affordable Housing	6	6	0	0	12
10. Development and Flood Risk	19	7	1	0	27
11. Green Belt	16	0	3	5	24
12. Gypsy and Traveller and Travelling Populations	7	0	0	5	12
13. Natural Environment	12	0	4	0	16
14. Sustainable Transport	8	24	0	8	40
15. Sustainable Design and Construction	15	3	0	0	18
16. Design	15	3	0	0	18
17. Dwelling Size and Type	3	0	0	0	3
18. Tourism	14	2	0	0	16
Total Interactions	173	100	13	35	321

- 7.2 An interaction between the policy and a RSF objectives can be noted in Table 7 below:

Table 7 - Interaction ID

Inter	Interaction Description
+VE	Policy in direct support of an RSF objective
?+VE	Policy may support an RSF objective depending upon implementation
-VE	Policy would have a negative effect on a RSF objective
?-VE	Policy may have negative effect on a RSF objective depending upon implementation

- 7.3 Table 6 shows that there are a total of 321 interactions between policies and the RSF objectives. 85% of interactions are positive or potentially positive in nature, against 15% that were identified as being negative or potentially negative against RSF

objectives. The detailed results of the Level 1 assessments are set out in Appendix 3.

- 7.4 In general, for this stage of the assessment relatively few of the policy options were found to have significant negative interactions. Where negative interactions were identified against certain sustainability objectives, these were considered to be offset, to an extent, by positive interactions in both the specific objective and in other related objectives. In a limited number of instances the interactions were recorded as uncertain. Clearly, as pointed out in Chapter 6 further refinement of both the policies and the assessments will need to consider more fully these areas of uncertainty and explore the potential need for policy wording change to bring about positive effects.
- 7.5 Table 6 illustrates the range of policy interactions, with some having more interactions than others. The policy set with the most interactions deals with sustainable transport and triggered 40 interactions. In contrast the policy sets that triggered the least interactions deals with housing density and dwelling size and type , both triggering only 3 interactions. It would be expected that some policies would have more interactions than others due to the wide ranging nature of some sets of policies compared to other policy sets that focus on a single issue.
- 7.6 It can be noted that interactions have been recorded against all of the RSF objectives with the exception of RSF objective 4. This objective is the requirement 'to raise educational achievement levels across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work'. This RSF objective may be regarded as less likely to produce interactions against Core Strategy policies as Runnymede Borough Council is not an Education Authority.
- 7.7 Overall the outcomes of the Level 1 assessments provide an objective assessment relating to various issues and confirm some general conclusion relating to the policy options. This assessment helps to inform and focus subsequent levels of assessment and also informs policy development, for example, the consideration of the balance between provision of housing and the protection of employment land coupled with the option to achieve greater protection of the environment whilst considering the potential impacts of a changing climate.

Level 2 Review Summary

- 7.8 A Level 2 assessment has been carried out against a number of the policy sets. This discusses in detail each interaction noted in Level 1. A complete copy of the Level 2 interactions can be found in Appendix 2.
- 7.9 Each Level 2 interaction discusses the interaction against the RSF objective and its data indicators. Also discussed are the outcome of the policy and comments including outcomes of any effects
- 7.10 It should be noted that whilst a complete set of Level 2 results is enclosed in Appendix 2 , comments as to the policies are still in progress and will be added shortly.

Summary of Findings from the Appraisal of the Proposals

- 7.11 The policy sets reviewed in level 1 recorded the majority of policies had positive or potentially positive interactions. Level 2 expanded on this information illustrating that whilst interactions are recorded as positive, potentially positive, negative or potentially negative data collated for Runnymede can show the data trending differently to the original interaction.

- 7.12 Of the Level 2s completed, the majority indicate that the policy sets will result in a positive effect against the impacted RSF objectives. It can be noted whilst the majority of policy sets appear to support RSF objectives, the magnitude of this support is complicated due to the trends within the data, as some RSF indicators suggest a negative trend.

Conclusions

- 7.13 Overall the appraisal of both options and proposals did not produce any findings which would suggest that any of them should be ruled out at this stage and should not go forward for public consultation. This appraisal should not be seen as a finished exercise but rather as part of a process which seeks to achieve preferred options and ultimately policies which are sustainable. In developing the preferred options the process will enable the tensions between different policy approaches to be highlighted and the appropriate weight that may be attached to a particular option having regard to its impact on sustainability objectives.

8 Next Stages

- 8.1 Following consideration of the CS policy options in the current consultation the preferred approaches will be developed, and will be subject to further stages of the sustainability appraisal framework, including a number of additional levels of assessment. The findings of these assessments will continually be feed back to the policy development team and ultimately will be set out in the Final SA Report to accompany the Core
- 8.2 Over the coming months leading up to the Council's CS DPD publication, its in-house Impact Assessment team will continue to appraise through the sustainability appraisal framework the evolving policy options. This is intended to ensure that all subsequent stages of the sustainability appraisal process will be an effective and integral part of the development and production of CS DPD. In the context of the SA guidance, this SA Progress Report reports on the work that has been commenced at Stage A, and continue within Stage B of the sustainability appraisal process. Stage B assessments will continue to appraise in broad terms the effects of strategic options (including any new options, which arise out of this consultation).
- 8.3 A key function of the SA is to identify inconsistencies between the Core Strategy DPD and the SA Framework during its development and refinement in State B, and presented in Stage C, and outlined in Table 8 below:

Table 8 - SA Stages B and C

Stage B: Developing and refining options and assessing effects of DPD
• B1: Testing the DPD objectives against the SA framework.
• B2: Developing the DPD options.
• B3: Predicting the effects the DPD.
• B4: Evaluating the effects of the DPD.
• B5: Considering ways of mitigating adverse effects and maximising beneficial effects.
• B6: Proposing measures to monitor the significant effects of implementing the DPDs.
Stage C: Preparing the Sustainability Appraisal Report
• C1: Preparing the SA Report.

- 8.4 At Stage C, an SA report will be prepared to accompany the published DPD for consultation. It will document all levels of assessment carried out during the production of the DPD, and identify residual inconsistencies between the CS DPD and the SA framework. In addition, it will document recommendations made for improving the policies where appropriate. In exceptional circumstances where it has been considered necessary to suggest elimination of a particular policy, reasons for this suggestion will be documented in the final SA Report. The whole SA process will ultimately inform the SA conclusion in terms of the overall sustainability of the CS DPD. The SA unavoidability requires judgments of significance of effects and the effectiveness of proposed mitigation to be made, the SA report will document all such assumptions.
- 8.5 The structure of the SA report is likely to be similar to that suggested in the 2005 guidance, and is shown in Appendix 5.

