

Spelthorne Borough Council

Sustainability Appraisal

Addendum December 2024



Spelthorne Takes Shape



1. Introduction

The Spelthorne Local Plan sets a strategic vision and spatial strategy for the Borough over the period up to 2039. It includes strategic policies which provide the guidance on the main issues that the Plan seeks to address, and development management policies on the detailed requirements that must be met for planning permission to be granted. It also sets out the site allocations for the borough with site-specific criteria for each local housing allocation.

The plan was submitted for examination in November 2022 and was the subject of initial examination hearings in May 2023. At the Extraordinary Council Meeting on 6 June 2023 a motion was agreed to pause the remainder of the Local Plan examination hearings to allow time for the new council to understand and review the policies. During this period of pause, the Council has undertaken additional work to support the submission Local Plan and has worked with relevant stakeholders to reach an agreeable outcome on the content of the Local Plan policies and allocation sites.

As a result of these discussions with relevant parties, the Council has amended several of the policies within the Local Plan prior to the re-commencement of the examination hearing sessions. Given the content of these policies and change since the Local Plan was initially submitted in November 2022, the Council has determined that it is appropriate to undertake an additional Sustainability Appraisal on the updated elements.

Sustainability Appraisal

A process of Sustainability Appraisal (SA) has been undertaken alongside the development of the Local Plan. As noted in Planning Practice Guidance “sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.”

SA must also meet the requirements for Strategic Environmental Assessment (SEA) which are outlined in the SEA Regulations¹. SEA is similar to SA; the most substantial difference is that it focuses on environmental protection objectives only.

This addendum to the Sustainability Appraisal primarily sets out the likely effects and scoring of the new and proposed changes to local plan policies, namely:

ST3: Local Plan Early Review (New policy)

SP1: Staines upon Thames (Update)

E3: Managing Flood Risk (Update)

This report is an addendum to the SA report² which was published alongside the Proposed Submission Local Plan. Its purpose is to review the policy changes which have been proposed to ensure that the updated Local Plan has been comprehensively appraised.

This report contains the following sections:

¹ The Environmental Assessment of Plans and Programmes Regulations 2004

² spelthornelocalplan.info/wp-content/uploads/sby-local-media/Core_Documents/CD004-Sustainability-Appraisal-of-Draft-Spelthorne-Local-Plan-Regulation-19-2022.pdf

- Section 2 which outlines the SA framework which is used to test the sustainability of the plan
- Section 3 which considers the screening of proposed changes and alternatives that have been considered as part of the process
- Section 4 which describes the assessment of policies, mitigation measures and overall effects of the Local Plan.
- Section 5 describes the next steps.

2. Sustainability Appraisal Framework

The Sustainability Appraisal process assesses the potential effects of the plan against social, economic and environmental objectives for sustainable development.

The SA objectives are combined into an appraisal framework and tests the plan. This is presented in Table 1 below. The sustainability objectives were first developed at the Sustainability Appraisal Scoping Stage using the findings of the review of plans and programmes, the characteristics of the plan area, and the key issues within the plan area. The SA is reported against the objectives, with the sub-objectives used for guidance in conducting the appraisal. This ensures that the sustainability framework is relevant and specific to the Local Plan and addresses the key sustainability concerns for Spelthorne.

Table 1: Sustainability Appraisal Framework

Objective	Decision Aiding Questions	Indicators	NPPF Theme
1. To provide sufficient high-quality housing to enable people to live in a home suitable to their needs and which they can afford.	<p>Will it provide housing to help meet identified needs?</p> <p>Will it reduce the number of unfit homes?</p> <p>Will it improve affordability?</p> <p>Will it provide specialist accommodation for elderly/disabled persons?</p> <p>Have a significant detrimental effect on the financial viability of delivering future housing?</p>	<p>Total housing completions by size, type and tenure.</p> <p>Number of households on the housing register.</p> <p>Plot requirements on the self-build register.</p> <p>Lower quartile property price compared against lower quartile workplace earnings.</p>	<p>Social – providing the supply of housing required to meet the needs of present and future generations.</p> <p>Economic – construction industry and building strong economy. High quality residential areas also create attractive areas for businesses to locate to.</p> <p>Environmental – provision of housing in suitable and sustainable locations will help to preserve the remainder of the natural environment.</p>
2. To facilitate the improved health and well-being of the whole population and reduce inequalities.	<p>Will it improve access to or provide healthcare and/or cultural and community facilities?</p> <p>Will it help to meet Accessible Natural Greenspace standards (ANGst)?</p> <p>Will it improve access to or provide green/blue infrastructure/ leisure/ recreation facilities?</p> <p>Will it improve highway safety for road users, cyclists and pedestrians?</p> <p>Will it contribute toward a safe & secure built environment?</p> <p>Will it help to address pockets of deprivations and child poverty?</p> <p>Will it reduce recorded levels of crime and fear of crime?</p> <p>Will it encourage healthy lifestyles?</p>	<p>Percentage of people whose health is classed as not good.</p> <p>Life expectancy Adult & child obesity levels.</p> <p>IMD Health Rankings</p> <p>Motorists/pedestrian/cyclists – number killed and/or seriously injured (KSI) per 100,000 population.</p> <p>Amount and quality of green infrastructure/recreation space by type (ha) or leisure facilities.</p> <p>Accessibility to Hospitals & GP Surgeries.</p> <p>Capacity of Health Facilities.</p> <p>Accessible Natural Greenspace (ANGst) Targets.</p> <p>Indices of Multiple Deprivation (IMD).</p>	<p>Social – the objective will assist in supporting strong, vibrant, inclusive, safe and healthy communities.</p> <p>Environmental – The facilitation of healthy and active lifestyles and open space provision will have positive impacts on the environment, resource use and enhance local green and blue infrastructure networks.</p>

Objective	Decision Aiding Questions	Indicators	NPPF Theme
		Number of developments implementing 'Secured by Design'.	
3. To increase resilience to, reduce the risk of, and minimising the harm from flooding	Will it reduce the number of properties at risk from all forms of flooding? Will it reduce the severity of a flood event? Will it increase the number of properties linked to sustainable drainage systems (SuDS)?	Number of properties at risk from flooding. Number of properties with flood mitigation installed. Number of properties built with SuDS installed.	Economic – CC resilient infrastructure will help to future proof businesses and make more resilient Social – maintain a healthy community/ wellbeing Environmental – protect environment/ build in resilience
4. To reduce land contamination and protect soil quality and quantity	Will it maintain the area of grade 1, 2 and 3a agricultural land? Will it remediate contaminated land and/or improve soil quality? Will it achieve efficiency in land use and avoid development of greenfield land over the redevelopment of previously developed land and buildings? Will it reduce the amount of derelict and/or underused land and/or vacant/unfit properties? Will it promote higher density development in appropriate locations?	Amount of contaminated land remediated. Area of grade 1, 2 and 3 agricultural land permanently lost to development (ha). Percentage of development built on previously developed land. Average density on sites with 10 or more dwellings (Dwellings per Ha.).	Economic – protect high quality agricultural land to protect the rural economy Environmental – protect and enhance of the natural environment
5. To reduce air and noise pollution	Will it improve air quality, in particular concentrations of NO2 and PM2.5? Will it reduce the number of properties or sites affected by poor air quality? Will it reduce the number of residential properties affected by and exposed to noise?	Annual average of NO2 and PM2.5, within AQMAs relative to national standards. The number of properties and land affected where levels of NOx or PM2.5 exceed national targets.	Social – improvements in air, noise and light pollution will support healthy communities Environmental – protect natural environment, improve biodiversity and mitigate climate change

Objective	Decision Aiding Questions	Indicators	NPPF Theme
		The monitoring of LEQ noise levels around airports. Number of non-airport related noise complaints received per annum.	
6. To conserve and enhance biodiversity, habitats and species	Will it maintain or enhance designated sites? Will it maintain/enhance numbers of priority species or the extent and condition of priority habitats identified in Biodiversity Opportunity Areas and the Borough as a whole? Will it avoid the fragmentation of designated and priority habitats? Will it contribute towards achieving net gains in biodiversity? Will it help to deliver any identified Nature Improvement Areas? Will it protect the Borough's green/blue infrastructure and enhance connectivity?	Population of wild birds. Extent and condition of SPA/Ramsar sites. Extent and condition of Sites of Special Scientific Interest (SSSI) meeting PSA targets. Extent and condition of priority species and habitats identified in Biodiversity Opportunity Areas in Spelthorne. Number, area and condition of Sites of Nature Conservation Importance (SNCIs) and Local Nature Reserves (LNRs) within Spelthorne. Extent and condition of ancient woodlands Number of Biodiversity improvement/enhancement schemes implemented per annum.	Social – enhancement of biodiversity will support the community's health and social well-being Environmental – help to conserve and improve biodiversity
7. To conserve and enhance the historic environment, heritage assets and their settings.	Will it conserve or enhance heritage assets, the historic environment and their settings? Will it improve the quality of the historic environment? Will it provide increased access to and enjoyment of the historic environment? Will it ensure that development is well-designed and is well-related to the surrounding townscape?	Number of listed buildings, ancient monuments and conservation areas. Statutory or locally listed buildings or structures at risk. Statutory or locally listed buildings or structures demolished. Scheduled ancient monuments at risk. Number of archaeological finds. Conservation area appraisals and level at risk.	Economic – protection of historic and cultural assets will support tourism economy and create attractive areas for businesses to locate to Social – maintain a high-quality built environment

Objective	Decision Aiding Questions	Indicators	NPPF Theme
8. To protect, enhance and manage Borough's open space and landscape character.	Will it protect and enhance landscape character? Will it ensure the quality of and provision of suitable open space, where need is identified?	Quality and quantity of open space provision Areas with landscape assessment	Social – the enhancement of the natural environment will support the community's health and social wellbeing Environmental – the protection and enhancement of the natural environment Economic – character of the natural environment is a consideration within “smart growth” as they are attractive areas to locate to
9. To promote sustainable modes of travel, improve accessibility to public transport and reduce road congestion	Will it reduce the need to travel, especially by private motorised vehicles? Will it avoid contributing to congestion on the highway network? Will it promote more sustainable modes of travel? Will it provide improved access to public transport services and facilities? Will it provide opportunities for integrated Transport? Will it promote travel to work/school by foot, cycle or public transport? Will it provide for disabled access to all transport options?	Traffic counts Travel to work by mode Number of schools/businesses with travel plans implemented Number of highway/cyclist/pedestrian improvement schemes implemented	Economic – an inadequate transport system will have significant detrimental effects on the economy therefore this will be needed to assist in building a strong, responsive and competitive economy Environmental – sustainable transport will mitigate climate change and assist with the move to a low carbon economy Social – more sustainable travel options will positively impact health, wellbeing and improve quality of life.
10. Maintain high levels of employment and economic growth which is inclusive and	Will it support a stable labour market and contribute towards skills improvement and employment opportunities?	IMD employment and education rankings. Working age population which are economically active.	Economic – contribute to building a strong, responsive and competitive economy

Objective	Decision Aiding Questions	Indicators	NPPF Theme
sustainable across the Borough.	<p>Will it support or promote inward investment and business growth?</p> <p>Will it retain the most sustainably located employment sites?</p> <p>Will it maintain or increase the total quantity and/or quality of commercial floorspace?</p> <p>Will it promote mixed use development?</p> <p>Will it promote or enhance the viability, vitality and attractiveness of town or local centres?</p>	<p>Educational attainment levels NVQ level 3 and above. The net change in the number of VAT registrations and de-registrations.</p> <p>Commercial floorspace levels and vacancies.</p> <p>Area of employment sites lost to other uses (ha). Amount of retail/commercial leisure floorspace implemented (sqm).</p> <p>Amount of retail/commercial leisure floorspace lost to other uses within town/local centres (sqm).</p> <p>Footfall numbers</p>	<p>Social – a strong economy that keeps unemployment levels low will help support strong, vibrant and healthy communities</p> <p>Environmental – support of innovative technologies will assist in the move to a low carbon economy and promoting the local economy will reduce the need to travel</p>
11.To limit the impact of Climate Change and promote the efficient use of resources, to reduce greenhouse gas emissions and move to a low carbon economy.	<p>Will it promote energy efficiency and/or renewable or low carbon technologies?</p> <p>Will it promote sustainable methods of construction and design?</p> <p>Will it promote the reuse and recycling of demolition waste?</p> <p>Will it reduce emissions?</p> <p>Reduce impact of climate change, including flooding and urban heat island effect?</p> <p>Will it ensure new and retrofitted development and infrastructure location and design is future proofed against the future impact of climate change?</p>	<p>CO2 Emissions (total and per capita).</p> <p>Number of commercial premises built to BREEAM 'Very good' or better.</p> <p>Installed renewable/low carbon energy capacity (MW/h).</p> <p>Amount of demolition waste reused or recycled per annum (tonnes).</p>	<p>Economic – contribute to building an innovative economy</p> <p>Social – support long term positive impacts on overall quality of life for current and future generations</p> <p>Environmental – mitigate climate change</p>
12.To maintain and improve water quality and	<p>Will it protect and improve the quality of all water sources?</p> <p>Will it increase water efficiency?</p>	<p>Percentage of river and groundwater units in the plan area whose</p>	<p>Social – improvements in water resources and supply e.g. drinking water provision</p>

Objective	Decision Aiding Questions	Indicators	NPPF Theme
promote the efficient use of water	Will it promote greywater recycling/rainwater harvesting? Will it protect and improve hydro-geomorphology and the overall ecological status of the watercourses?	biological and/or chemical quality is rated as good. Household consumption of water per day. Number of dwellings completed which exceed. Building Regulations standards for water efficiency. Commercial consumption of water per day. Number of commercial developments completed with water efficiency measures implemented.	Environmental – improve biodiversity, use natural resources prudently and minimise pollution Economic – reduced water consumption will have knock on impacts on financial and less outlay, providing opportunities for spending on the local economy.

Screening of Proposed Main Modifications

The new and proposed changes to Local Plan policies have been through a review, or screening process, to assess whether they are likely to have significant sustainability effects. In undertaking this screening process, the proposed changes have been considered to determine whether:

- they could bring about significant effects;
- the extent to which the potential effects have been assessed previously, or if new changes could come about that have not been appraised before;
- the proposed changes may, in combination with each other or with existing plan content, could result in significant cumulative, secondary or synergistic effects.

These factors have helped to determine where Sustainability Appraisal has been needed and whether the proposed main modifications need to be appraised. In this process a precautionary approach was taken, i.e. if there was any uncertainty about the significance of the proposed modifications, they were screened for further assessment.

'Screened-in' Modifications

Table 2 sets out the proposed main modifications and the likely SA implications. The SA produced for the submission Local Plan is considered to remain relevant and whilst the proposed modifications are not considered to materially alter the findings of the previous SA work, it was deemed that some further SA work would be required. This is to ensure that the SA process is carried through the local plan process and for new elements of the plan to be assessed.

Table 2: Proposed policy modifications and SA implications

Policy	Modification	SA implications
ST3: Local Plan Early Review (new policy)	New policy on Local Plan early review	The new policy has not been previously appraised. There is a need to show what other options were considered, show the appraisal of the options and the reasons for choosing the preferred option.
SP1: Staines upon Thames	Removal of the reference to the Staines Development Framework and inclusion of new text on landscaping and design.	Removal of the SDF reference may have negative effects in terms of the environment with more pressure from additional development, however removal of zoning restrictions may boost housing delivery. Some positive impacts from landscaping and SuDs provision. Overall the impacts are not considered to be demonstrably different to those previously identified in the SA.

E3: Managing Flood Risk	Significant rewording of the policy, particularly relating to Sustainable urban Drainage system requirements; and flood zone 3b 1 in 30 year change.	The proposed modifications represent a strengthening of the policy requirements with additional criteria relating to flood risk protection. This is particularly likely to have impacts on the environmental objectives but the overall impacts are not considered to be significantly different to those identified in the previous SA. The mitigation table needs to be updated to reflect the changes.
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Appraisal of the modifications

Appraisal of the policy options

Identifying policy options for how the borough should develop has been a key part of the Local Plan process. Options development (known as ‘alternatives’ within the SEA Regulations but referred to as options in this report to reflect common practice in planning in the UK) is also an important part of the SA/SEA process. In the Main SA report³ which was published alongside the Proposed Submission Local Plan, policy options were identified and appraised for a range of policy issues. A further strategic growth option was also subsequently identified, arising out of Duty to Cooperate discussions with Elmbridge Borough Council⁴. This included a significant increase in development levels by way of large-scale Green Belt release and higher densities to help meet the unmet housing needs of Elmbridge, however the negative impacts were deemed to be too severe and this option was discounted.

Following the initial Local Plan examination hearings in May 2023, a motion was agreed by Council Members to pause the remainder of the Local Plan examination hearings. Due to the time which has elapsed since the Local Plan was submitted (November 2022), the council proposes including a new policy within the Local Plan for early review. This will bring forward the timeframe in which the council will review the plan once adopted to ensure it takes account of up-to-date evidence. Two options were considered and appraised for this policy as set out below.

Option 1: Early Local Plan review

As a notable amount of time has passed since the preparation of the Local Plan commenced, much of the evidence that supported it is now in need of updating. Reviewing the Local Plan soon after adoption will ensure that Spelthorne can effectively respond to social, economic and environmental challenges. Due to the unknown quantity and location of development that may come about, there are many uncertain impacts expected. However, by assessing the existing policies against new NPPF requirements, there is an opportunity for positive effects to be realised, particularly against housing,

³ [Sustainability Appraisal](#)

⁴ [Spelthorne Local Plan: Supplementary Note](#)

health and economic objectives through increased access to affordable homes in the short to medium term.

Option 2: Follow the statutory five-year review of a Local Plan

This option will result in more uncertainty in the short term as it is unclear whether it will be possible to effectively deliver housing and meet community needs. By reviewing the Local Plan within the maximum five-year stage, evidence will grow increasingly out of date and local needs may go unmet for a longer period of time.

Many of the effects are uncertain when considered against the SA objectives since a review may result in different levels of location of development provision.

The detailed Sustainability Appraisals for both options are available in Tables 3 and 4 below.

Table 3: Option 1 - Local Plan Early Review

Option 1: ST3: Local Plan Early Review (New Policy)							
	Local Impacts	Trans-boundary Impacts	Short term	Medium Term	Long Term	Cumulative & secondary	Commentary/explanation, uncertainties, proposed mitigation
1. Housing	+	?	+	+	+	?	The provision of this policy will enable more homes to be planned for where they are needed into the future. The housing requirement and the Gypsy and Travellers Accommodation Assessment update (GTAA) will help to boost provision for different groups of the community, as the review and potential new plan are implemented. Reference to joint working with nearby local authorities may help to meet wider community needs however it is uncertain how this will manifest. Cumulative impacts are unknown, particularly on the natural environment if development levels increase.
2. Health	+	0	+	+	+	+	The early review, with a particular focus on the housing requirement and the GTAA will help boost access to suitable housing which in turn will help to support community wellbeing. Identification of any health-related services soon will help to bring about positive benefits in the short term.
3. Flood risk	+/?	?	0	+/?	+/?	?	The early review, including that of policy E3 will help to ensure that the approach to flooding will be up to date and compliant with national policy, into the future, particularly with the production of a flooding SPD. This will also likely have

Option 1: ST3: Local Plan Early Review (New Policy)							
	Local Impacts	Trans-boundary Impacts	Short term	Medium Term	Long Term	Cumulative & secondary	Commentary/explanation, uncertainties, proposed mitigation
							positive transboundary impacts given the strategic nature of flooding. A potential increase in development as a result of the review might lead to an increase in development in areas at risk of flooding however there is uncertainty as to how this may manifest. The borough is severely constrained by flood risk therefore accommodating an increase in development is likely to increase the number of people vulnerable to flood risk.
4. Land and Soil	?	?	?	?	?	?	The effects are largely uncertain, since a review may result in different levels or location of development provision. As such, it is unknown whether there will be an increase in greenfield development. The policy is unlikely to have a significant effect on development in the urban area as the use of previously developed land is likely to continue. More land use may come about as a consequence of early review if development levels increase but impacts are largely unknown.
5. Pollution	?	?	?	?	?	?	The early review is unlikely to have a significant effect on air quality and it is unknown as to how the review will impact on future levels of development in this regard. It is unclear how exposure to air and noise pollution will be impacted as well as any summative effects that may result from new development quantities or locations.
6. Biodiversity	?	?	?	?	?	?	The review could alter the amount of greenfield land to be developed, which may have implications for biodiversity. It is uncertain as to whether additional greenfield sites will be required and in turn whether biodiversity will be negatively affected, or positively through biodiversity net gain.
7. Heritage	?	?	?	?	?	?	It is unknown how the review policy will impact heritage. Additional development as a result of the housing requirement review could potentially alter local character

Option 1: ST3: Local Plan Early Review (New Policy)							
	Local Impacts	Trans-boundary Impacts	Short term	Medium Term	Long Term	Cumulative & secondary	Commentary/explanation, uncertainties, proposed mitigation
							however any future Local Plan strategy is currently unknown.
8. Open space and landscape.	?	?	?	?	?	?	There could be an impact on access to open space and landscape character however it is unknown how the future Local Plan will manifest and where development might take place.
9. Transport	+	?	?	?	?	+	The early review policy will help to ensure that matters including housing and employment needs are considered. It is largely unknown what effects might arise on transport, however the policy includes consideration of any infrastructure that may be required which could result in positive knock on impacts in terms of provision both locally and in the wider area.
10. Economic Dev.	+	+	+	+	+	+	A review of the Employment Needs Assessment will help to boost employment land in future by helping to meet local needs through allocation. This will also result in positive effects for the wider functional economic area. The policy aims to provide an appropriate level of housing growth. This should increase local demand and spend and create jobs in construction and other development-related industry. The early review may increase positive impacts in the short term.
11. Climate Change	?	?	?	?	?	?	Impacts on climate change are unknown. There could be negative impacts if the level of development is to increase substantially as a result of the review, however this will provide opportunities for mitigation.
12. Water	?	?	?	?	?	?	The policy seeks to take account of the most recent housing requirements set out in national policy which could lead to an increase in development. As such water use may rise. Given the unknowns regarding develop types and locations however, the effects are uncertain.
Summary: Many of the effects are uncertain since a review may result in different levels or locations of development provision, however the ambition to meet needs will likely have positive impacts on housing and economic objectives, with the opportunity to address any unmet needs in the short term as a result of an early review. There may be some							

Option 1: ST3: Local Plan Early Review (New Policy)

	Local Impacts	Trans-boundary Impacts	Short term	Medium Term	Long Term	Cumulative & secondary	Commentary/explanation, uncertainties, proposed mitigation
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negative impacts on the environment and resource use if development levels rise however this is largely unknown at this stage.

Cumulative impacts will depend on the degree to which development levels increase and where it is located. More development will likely put more stress on the environment but effects are largely unknown at this stage.

Possible Mitigation:

Including a reference to environmental guidance and policy in the new policy will help to ensure that the most up to date information is accounted for. This will provide boost protection for local biodiversity and natural resources, particularly if development levels are expected to increase. The review policy should ensure that future development for the Borough is sustainable socially, economically and environmentally for future residents and should try to offset negative impacts accordingly.

Conclusion:

The policy provides for an early Local Plan review, in recognition of the changing planning system, and changes to Spelthorne and the wider environment since the inception of the current Local Plan. It is noted that this may result in a comprehensive update of the Plan. The overall intention is to ensure the continued delivery of appropriate levels of social, economic and environmental development and supporting infrastructure, with consideration of the effects in the short, medium and long term. Effects are largely unknown at this stage but the early review policy should seek to minimise significant negative impacts and mitigate where possible. The policy seeks to have particular regard for key evidence and is mindful of social, economic and environmental factors therefore is considered to be a balanced approach.

Table 4: Option 2 - Five Year Review of Local Plan

Option 2: Follow the statutory five-year review of a Local Plan							
	Local Impacts	Trans-boundary Impacts	Short term	Medium Term	Long Term	Cumulative & secondary	Commentary/explanation, uncertainties, proposed mitigation
1. Housing	+	?	?/-	+	+	?	This option may enable more homes to be planned for where they are needed into the future. Potential to boost housing provision for different groups of the community, particularly into the medium and long term as the review and potential new plan are implemented, however needs may go unmet in the short term.
2. Health	+	0	?/-	+	+	+	Reviewing the plan at the five-year stage will provide the opportunity to meet community needs and increase health service provision however this is only likely to be realised in the medium to long term.
3. Flood risk	?	?	0	?	?	?	The borough is severely constrained by flood risk therefore accommodating further development is likely to increase the number of people vulnerable to flood risk. However, reviewing the plan will allow the opportunity to introduce more up to date flood risk guidance. The effects are largely unknown but are likely to manifest in the medium to long term.
4. Land and Soil	?	?	0	?	?	?	The effects are largely uncertain, since a review may result in different levels or location of development provision. As such, it is unknown whether there will be an increase in greenfield development. The policy is unlikely to have a significant effect on development in the urban area as the use of previously developed land is likely to continue.
5. Pollution	?	?	0	?	?	?	It is unknown as to how this option will impact on future levels of development and in turn how air quality will be impacted. It is unclear how exposure to air and noise pollution will be impacted as well as any effects that may result from new development quantities or locations.
6. Biodiversity	?	?	0	?	?	?	This option could alter the amount of greenfield land to be develop in the medium to long term, which may have implications for biodiversity. It is uncertain as to whether additional greenfield sites

Option 2: Follow the statutory five-year review of a Local Plan							
	Local Impacts	Trans-boundary Impacts	Short term	Medium Term	Long Term	Cumulative & secondary	Commentary/explanation, uncertainties, proposed mitigation
							will be required and in turn whether biodiversity will be negatively affected, or positively through biodiversity net gain.
7. Heritage	?	?	0	?	?	?	It is unknown how this option will impact heritage.
8. Open space and landscape.	?	?	0	?	?	?	There could be an impact on access to open space and landscape character however it is unknown how this option will manifest and where development might take place.
9. Transport	+/?	?	0	?	?	+/?	It is unknown what effects might arise on transport, however there is potential to meet community needs and provide transport services with a review at the five-year stage.
10. Economic Dev.	?	?	0	?	?	?	This option will have uncertain effects on impact on the objectives of achieving sustainable economic growth. Effects likely to manifest into the medium term once the review commences.
11. Climate Change	?	?	0	?	?	?	Impacts on climate change are unknown. It is uncertain where and what level of development will take place.
12. Water	?	?	0	?	?	?	Given the unknowns regarding development types and locations the effects are uncertain.
Summary: Many of the effects are uncertain, since a review at the five-year stage may result in different levels or locations of development provision. Effects are likely to materialise once the review takes place, meaning neutral effects are expected in the short term. Development levels may rise as a result of the review; however needs may go unmet in the short term without an early review, particularly as the council has already identified strategic matters that need updating.							
Possible Mitigation: To reduce uncertainty a commitment to reviewing the plan and particular evidence base documents will help to firm up impacts and help to boost positive effects.							
Conclusion: This option will result in more uncertainty in the short term (up to 5 years) as it is unclear whether it will still be possible to effectively deliver housing and other services. It will have uncertain effects on impact on the objectives of achieving sustainable economic growth and increasing access to affordable housing. Many of the other effects are uncertain, for the medium and long term, since a review may result in different levels or location of development provision.							

The Council's evidence to the examination, namely the housing trajectory, recognises that the council's 5-year and 10-year housing land supplies do not have a significant margin⁵. In recognition of this, as well as the recent consultation on NPPF planning reforms, the base date of many evidence base documents, and the Sustainability Appraisal analysis, the Council consider the most reasonable alternative is to commit to an early review rather than rely upon the statutory maximum five-year period.

This approach will reduce uncertainties and provide the council with the opportunity to boost positive impacts and reduce likely negative impacts.

Appraisal of the policy modifications

Appraisals of the proposed policy modifications was carried out by testing them against the sustainability objectives contained within the SA framework, as has been done throughout the Local Plan and SA process. The results of this process are presented in Tables 5 and 6 below.

Table 5: SP1: Staines upon Thames

SP1: Staines-upon-Thames (Update)							
	Local Impacts	Trans-boundary Impacts	Short term	Medium Term	Long Term	Cumulative & secondary	Commentary/explanation, uncertainties, proposed mitigation
1. Housing	++	0	++	++	++	++	The policy recognises that Staines provides a key focus for housing. The removal of the reference to zoning may provide the potential for an increased quantum of development.
2. Health	+	0	+	+	+	+	SP1 encourages new community infrastructure and facilities, including healthcare. With a significant amount of development proposed through this option, this is likely to encourage a shift to more localised services and sustainable travel.
3. Flood risk	0	0	0	-	-	0	The significant level of growth associated with this option is likely to increase the population in flood risk areas, with a significant proportion of land at risk of flooding in Staines. Removal of the Staines Development Framework reference may hinder strategic planning in the area and the removal of zoning may increase the quantum of development. The policy requires flood risk infrastructure to be incorporated where necessary, however. Negative impacts may arise over time associated with the level of development proposed in the area.

⁵ At the time of writing the latest housing trajectory identifies a 5.03 and 10.05 land supply respectively (03/12/2024).

4. Land and Soil	+	0	+	+	++	++	This policy will help to utilise brownfield land and steer development away from greenfield land across Spelthorne. The policy aims to support sustainable living in Staines. Removal of the Staines Development Framework will help to promote higher density development in the absence of zoning height limits.
5. Pollution	0	0	0	0	-	0	More opportunities for sustainable and active travel with a strategic policy on Staines. It is anticipated that this option will reduce reliance on cars, however the level of development proposed in the town will likely lead to an increase and pollution and also exposure to pollution from the road network and rail line (noise), possibly more so in time with the absence of the SDF.
6. Biodiversity	+	0	+	+	+	+	The policy makes reference to introducing additional landscaping and SuDs which can provide wildlife benefits.
7. Heritage	+	0	+	+	?	+	The policy seeks to preserve and enhance the Staines conservation area and requires development to be of high quality therefore positive effects are expected. Loss of the SDF may lead to more development close to heritage assets but it is unknown how this may manifest into the future.
8. Open space and landscape.	+	0	+	+	+	+	Removal of the SDF reference may limit open space provision however new references have been made to public realm enhancements that would improve amenity by introducing additional landscape which is likely to maintain the positive impacts expected.
9. Transport	+	0	+	+	+	++	More opportunities for sustainable and active travel modes with reduced reliance on the private car over time with development concentration in the town centre. More widely this will encourage a modal shift to sustainable transport. Support for sustainable transport links.
10. Economic Dev.	+	0	+	+	++	+	Increased residential development and encouraging new development in the town centre will likely have positive effects.
11. Climate Change	+	0	0	+	+	+	This policy combines heat and power opportunities and renewable energy from concentrated development in the town centre.

12. Water	?	0	?	+	+	?	New reference to riverside development with new landscaping and SuDs to improve water quality could have positive effects. Somewhat unknown effects as is dependent on how schemes are designed and implemented.
<p>Summary: Impacts on the SA objectives are generally positive however the removal of the reference to the Staines Development Framework may limit the ability to plan holistically to a degree, and removal of zoning heights may lead to an increased level of development, potentially in more sensitive areas. Reference has been added to the National Model Design Code which could help to offset any changes in scoring however character might be at risk of changing.</p> <p>Effects generally remain the same, however flood risk may increase, and development levels may rise.</p>							
<p>Possible Mitigation:</p> <p>Mitigation could include sustainable construction, energy efficiency measures and sustainable transport links. Infrastructure provision should also be strengthened.</p> <p>Removal of the SDF may have knock on effects in terms of character and holistic planning therefore the plan should seek to ensure that development character makes a positive contribution to the area.</p>							
<p>Conclusion:</p> <p>Overall the policy is expected to have a positive impact on social, economic and environment objectives. Flood risk has been identified as a negative impact however the strengthening on E3: Managing Flood Risk may help to offset impacts. Removal of the SDF references may impact local character and may lead to a rise in development heights with the absence of zoning, however the policy has been strengthened with references to design code, landscaping and SuDs.</p>							

Table 6: Policy E3: Managing Flood Risk

E3: Managing Flood Risk (Update)							
	Local Impacts	Trans-boundary Impacts	Short term	Medium Term	Long Term	Cumulative & secondary	Commentary/explanation, uncertainties, proposed mitigation
1. Housing	0	0	0	0	0	0	Neutral impacts expected on the housing objective.
2. Health	+	+	+	+	+	+	This policy requires development to address flood risks and contributes to a safe and secure environment. Given the strategic nature of flooding, positive transboundary impacts can be expected if flood risk is to be reduced.
3. Flood risk	+	+	+	+	++	+	This policy aims to address flood risk issues. Positive impacts are expected from flood alleviation schemes which are likely to materialise in the longer term. The overall aim of the policy is to ensure development is safe and to reduce flood risk to new and existing development therefore positive impacts can be expected.
4. Land and Soil	0	0	0	0	+	0	No significant impacts are expected on land and soil. As consideration will be given to the reinstatement of areas that can operate as functional floodplain, there may be long term positive impacts on soil.
5. Pollution	0	0	0	0	0	0	Neutral impacts expected on pollution.
6. Biodiversity	+	+	+	+	+	+	The policy supports the River Thames Scheme which aims to create new green spaces and enhance the social and environmental value of the river. References to SuDs being multi-functional and improving biodiversity is considered to have positive impacts both locally and across the boundary.
7. Heritage	0	0	0	0	0	0	Neutral impacts expected on heritage.
8. Open space and landscape.	+	0	0	0	+	0	The policy seeks to incorporate sustainable drainage into landscaping which is considered to have positive impacts into the long term as this is realised. The policy supports the River Thames Scheme which aims to create new green spaces and enhance the social and environmental value of the river.
9. Transport	0	0	0	0	0	0	Neutral impacts expected.
10. Economic Dev.	+	0	0	0	+	0	There is likely to be some protection against flood risk impacts for

E3: Managing Flood Risk (Update)

	Local Impacts	Trans-boundary Impacts	Short term	Medium Term	Long Term	Cumulative & secondary	Commentary/explanation, uncertainties, proposed mitigation
							businesses which will have minor positive impacts. As the River Thames Schemes comes forward in the long-term positive impacts can be expected given the security provided to businesses. Some developments with economic benefits may be refused as a result of this policy. However, the policy recognises that some flexibility is needed and specifies clear and detailed criteria for assessing proposals, therefore negative effects are minor.
11. Climate Change	+	0	+	+	+	+	This policy includes measures to alleviate the effects of flooding in relation to climate change.
12. Water	+	+	+	+	+	+	The policy seeks to achieve improvements in water quality through sustainable drainage systems. This will also have positive effects on water courses outside of Spelthorne.

Summary:

This policy seeks to reduce flood risk and positively impact the environment. Support for the River Thames Scheme has positive impacts on biodiversity, open space and economic development. Since submission of the Local Plan, the policy has strengthened its reference to SuDs measures to alleviate flood risk and reduce surface water run-off. Overall the policy is expected to have positive impacts and has been strengthened in support.

Possible Mitigation:

In areas at risk of flooding, or on any other proposal where safe access/egress cannot be achieved, suitable flood risk mitigation and management plans must be submitted. The policy has strengthened its requirements for flood risk protection measures and in consultation with the Environment Agency, has led to site-specific requirements for sites most vulnerable to flooding.

Conclusion:

New development should be planned to avoid increased vulnerability to flooding. The policy sets out the Sequential Test to guide development to less risky locations and the Exception Test to allow redevelopment of existing developed sites in the higher risk flood zones. Developments should also take into account the requirements of the implementation of current and future improvements to the River Thames flood defences. SuDs will help reduce surface water flooding and manage run off whilst also provide multi-functional benefits. This policy should make homes and communities more resistant and/or resilient to flooding. The policy resists development in areas of flood risk, which will be important in delivering against a number of SA objectives. The policy may hinder development which would generate economic benefit but the policy provides clear criteria for the circumstances in which development in areas of flood risk will be considered acceptable and prioritises safety. Overall positive impacts are expected as a result of the policy, with these effects strengthened through additional flood risk mitigation measures.

Mitigation Measures

The tables above include the possible mitigation measures to address the identified negative effects and uncertainties. These measures are considered to improve the plan policies, including cumulative effects.

The mitigation measures identified have been fed back into the policy development process to help strengthen the performance against the SA objectives.

Next Steps

Once the Local Plan hearings resume, any further proposed modifications will need to be assessed as part of the SA process. The Council will therefore undertake a further Sustainability Appraisal to assess the likely effects and identify any possible mitigation measures.

The Council will then produce a final post-adoption SA report and undertake monitoring of significant effects once the plan is implemented.