

## SUSTAINABILITY APPRAISAL REPORT

### **Alteration to the Reading Borough Local Development Framework (Local Plan)**

March 2014

## NON-TECHNICAL SUMMARY

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- 1.1 The Alteration to the Local Plan (2014) will form part of the Reading Borough Local Development Framework (LDF), now termed a local plan, setting out policies for the provision of affordable housing as part of residential developments, in line with the objectives of the Core Strategy.
- 1.2 In preparing a Development Plan Document, it is a legal requirement that a Sustainability Appraisal of the effects of the document be carried out. A Sustainability Appraisal has therefore been undertaken to assess the environmental, social and economic effects of the options for reviewing and replacing adopted policies in the existing LDF. The Appraisal is based on the 18 sustainability objectives set out in the Revised Sustainability Appraisal Scoping Report (October 2008)<sup>1</sup> produced for the preparation of what became the Sites and Detailed Policies Document (adopted in 2012). This report should be read in conjunction with that report in terms of the baseline information methodology used in preparing a sustainability appraisal. This Alteration only considers 2 policies and the sustainability appraisal of those policies is similar to the appraisal of the original policies as the results of those appraisals have not have changed.
- 1.3 The Revised Sustainability Appraisal Scoping Report identified the main sustainability issues affecting the Borough. The report also assessed the objectives of the Core Strategy for consistency with the sustainability objectives. No areas of particular inconsistency were identified.
- 1.4 Appendix 1 contains the appraisal of the 2 policies reviewed in the Pre-Submission Draft Alteration. The policies reviewed show positive sustainability effects, although these effects are limited to a small number of relevant objectives in each case. The provision of affordable housing in itself does not have additional environmental impacts over the general provision of housing. The provision of affordable housing will, however, promote human health and well-being, and help create stronger communities. Positive economic impacts are also likely to result.
- 1.5 This Sustainability Appraisal Report will be open for community involvement alongside the Pre-Submission Draft Alteration. Representations on it will be considered in the same way as for that document.

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<sup>1</sup> [Revised Sustainability Appraisal Scoping Report, October 2008](#)

## INTRODUCTION

### 2.1 Requirement for Sustainability Appraisal

- 2.1.1 Planning authorities are required to carry out a Strategic Environmental Assessment (SEA) of Local Development Documents in accordance with the requirements of a European Directive (2001/42/EC). This was enshrined in national law by the Planning and Compulsory Purchase Act 2004, which introduced a requirement to carry out Sustainability Appraisal for all LDDs. Sustainability Appraisal fully incorporates the European SEA requirements, but expands it to also take account of social and economic matters. Thus, where this report refers to the SEA Directive, these requirements also apply to the wider remit of Sustainability Appraisal.
- 2.1.2 The Sustainability Appraisal process is intended to be an integral part of preparing an LDD, rather than an adjunct to it. The intention is that it will help planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans, and thus contribute to sound plan making. Sustainability Appraisal should inform the evaluation of options, and should provide a key means to demonstrate the appropriateness of a plan given reasonable alternatives.
- 2.1.3 Therefore, Sustainability Appraisal is more than a simple checking exercise. It is a key part of the process of evaluating plans and proposals as they emerge.

### 2.2 Local Development Framework

- 2.2.1 The Local Development Framework (LDF), which under the National Planning Policy Framework becomes a local plan, comprises a series of documents that collectively deliver the planning strategy for Reading Borough. The key documents within the LDF, or local plan, are Development Plan Documents (DPDs), which have 'development plan' status for the determination of planning applications. The Council's Local Plan currently comprises three DPDs, as follows:
- Core Strategy;
  - Reading Central Area Action Plan;
  - Sites and Detailed Policies Document.
- 2.2.2 The **Core Strategy** is the key plan within the Local Development Framework, and was adopted in January 2008. It sets out the overarching policy framework for the Borough up to 2026, including the vision and objectives, the spatial strategy for development, and core policies to help in implementing the strategy. All other DPDs must be in general conformity with the Core Strategy.
- 2.2.3 The **Reading Central Area Action Plan (RCAAP)**, adopted in January 2009, is the document that sets out the planning strategy for the significant change that will be occurring in the central area up to 2026. It identifies a spatial strategy for the centre, identifies key sites, includes specific policies and sets out an implementation framework.
- 2.2.4 The **Sites and Detailed Policies Allocations Document (SAD)** allocates land for a range of uses, and designates land for protection, to support the strategic spatial vision and objectives of the Core Strategy up to 2026. This document was adopted in October 2012.

2.2.5 Alongside the above documents, the Council has produced a **Proposals Map**. This is a map showing the relevant policies and allocations from the Borough's LDF. The map has DPD status, and was therefore subject to Sustainability Appraisal, but the map cannot introduce new policy by itself - it merely represents the content of the other DPDs.

### **2.3 What has been appraised?**

2.3.1 The Act requires development plan documents to undergo a Sustainability Appraisal as part of the process of ensuring that they will contribute to sustainable development. The integration of the Sustainability Appraisal (SA) into development plan preparation is considered to be fundamental to sound plan making.

2.3.2 This Sustainability Appraisal assesses the content of the Pre-Submission Draft Alteration to the Local Plan. The Appraisal assesses each of the 2 policies in turn, along with a range of reasonable alternative approaches for each.

2.3.6 In terms of options, these need to be reasonable. An option which would be clearly out of conformity with the Core Strategy, or higher level policy, would not be reasonable as it would render the Alteration unsound. Therefore, the options assessed are the options that are possible within the context of higher-level policy. They are similar to the options considered for the preparation of the original LDF documents.

### **2.4 Limitations**

2.4.1 Sustainability Appraisal is an extremely valuable exercise in terms of balancing various effects against each other. However, it does not represent the whole of the analysis needed. Even where one option scores most positively in terms of sustainability, it may not be appropriate for other reasons.

2.4.2 Care also needs to be taken not to treat the SA as a quantitative exercise. It is not simply a matter of how many ticks are in the appraisal. On some sites, one positive effect may outweigh several negative effects, and vice versa. Again, the background evidence to support the draft SDPD explains why such decisions have been made.

### **2.5 Who carried out the Sustainability Appraisal?**

2.5.1 The production of the SA is the responsibility of the Local Planning Authority, Reading Borough Council. There is no requirement that the report be prepared by an independent body to that responsible for the LDD, which is the subject of the appraisal. Indeed, the core philosophy behind the system of sustainability appraisal is that the process informs the production of the LDD, and therefore, too great an independence is not desirable.

2.5.2 This Sustainability Appraisal was drafted by the officers responsible for the production of the Alteration. This is appropriate at this stage, as the consideration of environmental, social and economic outcomes is the central element to deciding on the policy approach and the suitability of each site.

### **2.6 Influence of the Sustainability Appraisal**

2.6.1 Sustainability Appraisal was an integral part of drawing up the various Local Development Framework Documents. This appraisal uses those previous appraisals as the starting point. In the light of the limited changes proposed to the policies, the appraisal results remain largely as determined when the policies were originally drafted. Little has changed in terms of the positive effects of the policies in sustainability terms.

## **2.7 Consultation on the Sustainability Appraisal**

2.7.1 This Sustainability Appraisal of the SDPD and Proposals Map is open for consultation and comments can be made to the Council as part of the consultation on the Draft Alteration which is programmed to take place during March, April and May 2014.

## 3.0 BASELINE AND CONTEXTUAL INFORMATION

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### 3.1 Sustainability Appraisal Baseline Information

3.1.1 Baseline information for Reading Borough is contained within the Council's Revised Sustainability Appraisal Scoping Report, October 2008. This document was originally published for the Reading Borough Local Development Framework in June 2005, and was updated in March 2006, January 2007 and again in October 2008. This latter update was tailored to the emerging Site Allocations and Development Management DPDs (which became the Sites and Detailed Policies Document), and was also brought up to date with new information, and in line with new plans and strategies. Section 5 of the Scoping Report is the key section.

3.1.2 The information presented in the 2008 Scoping Report which has informed this Sustainability Appraisal includes the following:

- Reading Borough is a tightly drawn authority, and the urban area of Reading extends significantly beyond the Borough boundaries;
- Substantial recent development, particularly developments in the centre such as the Oracle and Reading Station, have raised Reading's profile and strengthened its centre;
- Reading is one of the major contributors to an overall strong regional and sub-regional economy;
- In overall terms, there are relatively low levels of unemployment and general affluence;
- However, there are some significant pockets of deprivation in parts of Reading where unemployment is high and income is low;
- There is a disparity in skill and qualification levels, with higher than average levels of both highly qualified people and people with low or no qualifications;
- There is a substantial need for affordable housing, larger than the Borough's overall housing allocation;
- Reading is a major transport hub, and its station is the second busiest outside London;
- Although the Borough is primarily urban, it also includes two important landscape types - the flood meadows of the Thames and Kennet, and the fringe of the Chiltern hills; and
- There is a distinct historic environment, including over 800 listed buildings, two Scheduled Ancient Monuments and 15 Conservation Areas, as well as archaeological remains.

3.1.3 In addition, previous sustainability appraisals of the Council's Core Strategy DPD have provided a general overview of Reading Borough, which have (and continue to) inform the evaluation and prediction of sustainability effects arising from plans and proposals forming part of the Local Development Framework (refer to *Sustainability Appraisal of the Core Strategy Document Preferred Options* for details on the characteristics of Reading Borough, and Appendix 1 of the *Sustainability Appraisal of the Core Strategy Submission Draft* for a list of key sustainability issues).

3.1.4 It is accepted that much of this information is now out of date. A new Sustainability Appraisal Framework with updated profile is currently in preparation as part of the forthcoming review of the local plan. Nevertheless, much of the

earlier information remains relevant in terms of Reading's role as capital of the Thames Valley and an important hub in the South East of England that remains committed to growth. It is a relatively large urban area exhibiting issues and problems normally associated with such an urban area. Inevitably, there are some important elements which have changed since the Scoping Report.

- 3.1.5 In particular, the economic downturn has affected Reading, much as it has affected other urban centres outside London. The indications are that development is not proceeding as quickly as had been anticipated on some sites. However, there are no indications that there will be long-term changes to the economic characteristics of Reading. A number of factors, including the proximity and links to London and Heathrow Airport, should continue to ensure that Reading remains, in overall terms, economically buoyant and attractive to growth in accordance with the vision and strategy set out in the Core Strategy.

## 3.2 Review of Other Plans and Programmes

- 3.2.1 Figure 1 of the Strategic Environmental Assessment (SEA) Directive states that an SEA must provide information on the 'relationship with other relevant plans and programmes'. As for any Development Plan Document (DPD), the two policies in the Alteration have been drafted to be consistent with national planning guidance in the form of the National Planning Policy Framework (NPPF).
- 3.2.2 At a local level, the Alteration will sit within the Local Development Framework (LDF) as part of a group of documents forming Reading's planning strategy. The most important relationship is with the **Core Strategy**. This is the key plan within the LDF. It sets out the overarching policy framework for the Borough, including the vision and objectives, the spatial strategy for development, and core high-level policies, to guide development to 2026. It was adopted in January 2008. The Alteration must be in general conformity with the Core Strategy. The Alteration shares the vision and objectives of the Core Strategy.
- 3.2.3 The Alteration also needs to be seen within the context of the **Sites and Detailed Policies Document** and the **Reading Central Area Action Plan**. The SDPD in particular is of importance, as it contains a range of policies relating to housing, other development management policies, and a number of housing allocations.

## 4.0 FRAMEWORK FOR SUSTAINABILITY APPRAISAL

- 4.1 The Sustainability Appraisal Framework forms the basis against which sustainability appraisal of any Local Development Document should be carried out. According to the Government guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' (ODPM, November 2005), a SA Framework should 'consist of objectives, which should, where possible, be expressed in the form of targets, the achievement of which should be measurable using identified indicators' (3.2.14, p46).
- 4.2 The SA Framework comprises eighteen (18) objectives, against which the sites have been appraised. These objectives were amended in 2008 to take account of current planning issues and priorities. The sustainability objectives are set out below. The Framework also indicates how these objectives will be measured, and sets out a list of indicators for each objective.

Revised Sustainability Objectives (2008)	
<b>Living within Environmental Limits (Environmental Objectives)</b>	
1	To limit the impact of climate change through minimising CO2 emissions and other greenhouse gases
2	Adapt to inevitable climate change in terms of preparedness for extreme weather events, including managing the risk of flooding
3	Use energy, water, minerals and other natural resources appropriately, efficiently and with care
4	Minimise the consumption of, and reduce damage to, undeveloped land, appropriately utilising brownfield land
5	Minimise the generation of waste and promote more sustainable approaches to waste management
6	Minimise air, water, soil/ ground and noise pollution
7	Value, protect and enhance the amount and diversity of wildlife and habitat, and other contributors to natural diversity, including establishing/enhancing ecological networks
8	Create, enhance and maintain safer, cleaner and greener environments and attractive and functional buildings
9	Value, protect and, where appropriate, enhance the historic environment
<b>Ensuring a Strong, Healthy and Just Society (Social &amp; Economic Objectives)</b>	
10	Protect, promote and improve human health and well-being through healthy lifestyles and healthcare provision
11	Promote safe, stronger and vibrant communities through measures to reduce crime and the fear of crime and enhance community cohesion
12	Provide high quality housing of a type and cost appropriate to the needs of the area
13	Reduce the need for travel and transport particularly by car or lorry while providing good physical access for all to services, facilities and other people by means such as walking and cycling
14	Value the social and cultural diversity and the local distinctiveness of communities
15	Ensure accessible opportunities for all to engage in culture, leisure, and physical and recreational activity, particularly in areas of open space and waterspace.
16	Facilitate sustainable economic growth and regeneration that provides employment opportunities for all and supports a successful, competitive, and balanced local economy that meets the needs of the area, and improves the economic situation for particularly deprived communities
17	Maximise access for all to the necessary education, skills and knowledge to play a full role in society
18	Provide opportunities for all to participate fully in society including local democracy and decision-making processes



## **5.0 STAGES OF A SUSTAINABILITY APPRAISAL**

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The stages of a Sustainability Appraisal (as documented in the government guidance) are outlined Section 5 of the Revised Sustainability Appraisal Scoping Report (October 2008).

## **6.0 SIGNIFICANT SUSTAINABILITY IMPLICATIONS**

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- 1.5 The only significant effects for the 2 policies that are reviewed in the draft Alteration to the local plan are significant positive effects in terms of the provision of housing. No significant negative effects are expected. The provision of affordable housing in itself does not have additional environmental impacts over the general provision of housing. The provision of affordable housing will, however, promote human health and well-being, and help create stronger communities. Positive economic impacts are also likely to result.

## 7.0 REFERENCES

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- Office of the Deputy Prime Minister (2005), Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents
- Office of the Deputy Prime Minister (2005), **A Practical Guide to the Strategic Environmental Assessment Directive**
- Reading Borough Council (2007), **Sustainability Appraisal of the Core Strategy Submission Draft**
- Reading Borough Council (2007), **Local Development Scheme**
- Reading Borough Council (October 2008), **Revised Sustainability Appraisal Scoping Report**
- Reading Borough Council (2008), **Adopted Core Strategy**
- Reading Borough Council (2009), **Adopted Reading Central Area Action Plan**
- Reading Borough Council (2012), **Adopted Sites and Detailed Policies Document**



✓✓	Clear, strong positive impact	✓	Overall impact likely to be positive	0	Overall impact neutral	X	Overall impact likely to be negative	XX	Clear, strong negative impact	?	Uncertain effect	?✓	Tendency for positive impacts
												?X	Tendency for negative impacts

## Appendix 1

Policy	Sustainability Objectives & Effect																		Comments on Significant Effects
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
<u>Affordable Housing</u> CS16 (i): Draft Altered Policy	0	0	0	0	0	0	0	0	0	✓	✓	✓✓	0	✓	0	✓	0	0	<p>The provision of affordable housing in itself does not have additional environmental impacts over the general provision of housing. The provision of affordable housing will promote human health and well-being, and help create stronger communities. Positive economic impacts are also likely to result.</p> <p><b>Mitigation:</b> Policies in the document, particularly the cross cutting policies and policies on open space, the built and natural environmental, etc., seek to mitigate as far as possible the negative environmental effects of new development. Policies in the document seek to mitigate effects on transport, crime and pressure on facilities, etc.</p>
CS16 (ii): 'Business as Usual' Approach	0	0	0	0	0	0	0	0	0	✓/ ?X	✓	✓✓	?X	✓	?X	✓	?X	0	<p><b>Assumptions: Rely on continuation of existing policies.</b> Existing local plan policy does not accord with NPPF, particularly in relation to viability. The Council's CIL charge is likely to be detrimentally suppressed and, as a result contributions to infrastructure may not achieve existing levels. It could therefore result in poorer levels of infrastructure provision which will be less socially and economically beneficial.</p>

✓✓	Clear, strong positive impact	✓	Overall impact likely to be positive	0	Overall impact neutral	X	Overall impact likely to be negative	XX	Clear, strong negative impact	?	Uncertain effect	?✓	Tendency for positive impacts
												?X	Tendency for negative impacts

Policy	Sustainability Objectives & Effect																		Comments on Significant Effects	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18		
CS16 (iii) No policy																				Assumption: Policy is deleted. Policy framework would not enable provision of affordable housing and would not therefore be socially beneficial in terms of the provision of much needed affordable housing. It would improve viability of development and allow higher CIL charge towards infrastructure provision.
CS16 (iv) Reduce targets in the policy further	0	0	0	0	0	0	0	0	0	0	✓	✓	✓	0	✓	0	✓	0	0	Assumption: that the targets for affordable housing in the draft altered policy should be at a lower level. A lower level of affordable housing provision as part of development schemes proposing 15 or more dwellings would affect the overall provision of affordable housing. This lower provision will be less socially beneficial, denying housing that could viably be provided to households in need of such housing in the Borough.
DM6: (i) Draft Altered Policy	0	0	0	0	0	0	0	0	0	0	✓	✓	✓✓	0	✓	0	✓	0	0	The provision of affordable housing in itself does not have additional environmental impacts over the general provision of housing. The provision of affordable housing will promote human health and well-being, and help create stronger communities. Positive economic impacts are also likely to result. In addition, on-site provision on these smaller sites will help to provide vibrant, mixed, sustainable communities. Mitigation: Policies in the document, particularly the cross cutting policies and policies on open

✓✓	Clear, strong positive impact	✓	Overall impact likely to be positive	0	Overall impact neutral	X	Overall impact likely to be negative	XX	Clear, strong negative impact	?	Uncertain effect	?✓	Tendency for positive impacts
												?X	Tendency for negative impacts

Policy	Sustainability Objectives & Effect																		Comments on Significant Effects	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18		
																				space, the built and natural environmental, etc., seek to mitigate as far as possible the negative environmental effects of new development. Policies in the document seek to mitigate effects on transport, crime and pressure on facilities, etc.
DM6(ii) No Policy for AH provision on sites below 15 dwellings	0	0	0	0	0	0	0	0	0	0	✓	✓X	0	?✓	0	✓	0	0	This would mean reliance solely on CS16 for the provision of affordable housing, which would fail to maximise the potential contribution from sites of less than 15 dwellings as currently allowed by the NPPF. This lower level of provision will be less socially beneficial, denying housing that could viably be provided to households in need of such housing in the Borough.	
DM6(iii) adopt lower threshold only for 10-14 units.	0	0	0	0	0	0	0	0	0	0	✓	✓	0	✓	0	✓	0	0	This becomes a possibility in the light of the Chancellor's 2013 Autumn Statement when he announced the government intention to introduce a threshold of 10 units. This will result in a significant decrease in delivery of affordable housing. This will reduce the level of housing that could viably be provided to households in need of such housing in the Borough.	
DM6(iii) Business as Usual	0	0	0	0	0	0	0	0	0	0	✓	✓	✓✓	0	✓	0	✓	0	Assumption: that existing policy is unaltered. Policy alteration is relatively minor compared to DM6 (i) above.	