

**Swindon Borough Council**

**Environment and Leisure**

**Draft Backland and Infill Development  
Supplementary Planning Document**

**Sustainability Appraisal Report  
(inc. Strategic Environmental Assessment)**

**February 2007**

This report may be viewed on the Council's website at:  
[www.swindon.gov.uk/sustainabilityappraisal](http://www.swindon.gov.uk/sustainabilityappraisal)

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## **Non-technical summary**

### **Introduction**

This report outlines the findings of the Sustainability Appraisal of the Draft Backland and Infill Development Supplementary Planning Document (SPD).

Under Section 39(2) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal is mandatory for new or revised Local Development Documents. Local authorities must also conduct an environmental assessment in accordance with the requirements of European Directive 2001/42/EC (the SEA Directive). Throughout this report, where reference is made to Sustainability Appraisal, it relates to the combined process of Sustainability Appraisal and Strategic Environmental Assessment (SEA).

### **What is the purpose of Sustainability Appraisal?**

Sustainable development is the core principal underpinning the reformed planning system. The principal purpose of Sustainability Appraisal, therefore, is to promote sustainable development - it is a systematic process undertaken throughout the preparation of a plan or programme.

### **Approach taken in carrying out the Sustainability Appraisal**

The key stages in the preparation of the Sustainability Appraisal and Draft SPD are outlined in Table 2.1 in section 2 of this report. The Sustainability Appraisal Scoping Report (Stage A) is available as a separate document and can be viewed on the Council's website at [www.swindon.gov.uk/sustainabilityappraisal](http://www.swindon.gov.uk/sustainabilityappraisal).

### **Alternative options considered in the Sustainability Appraisal**

Given the duty under the Planning and Compulsory Purchase Act 2004 for those preparing Local Development Documents to contribute towards sustainable development, it is essential for the SPD to set out to improve on the effects of implementing the existing 'saved' plan policies.

In this report, the contents of the Draft SPD have been compared against a 'business as usual' scenario – a scenario that would involve continued application of the existing 'saved' policy in the Swindon Borough Local Plan 2011, with no additional guidance in the form of an SPD. The comparison of these two options is presented in Appendix B of this report.

## **What are the significant effects of the SPD?**

The significant social, environmental and economic effects of the options have been predicted and evaluated, considering the probability, duration and frequency of the effects, including secondary, cumulative and synergistic effects.

The likely significant positive effects of the SPD are as follows:

- Proposed backland and infill developments will be integrated with, and complement, the neighbouring buildings and the local area in terms of scale, density, layout and access. They will be designed to harmonise with their surroundings and reduce effects on amenity, including noise, overshadowing, privacy and access issues.
- Development of backland and infill sites represents an efficient use of land by concentrating development on previously developed land. This may reduce pressure to develop greenfield sites outside the urban area.
- The policy meets national guidance for using land within existing urban areas. Locations within the urban area are considered more sustainable because they offer a better range of community facilities with access to jobs, key services and infrastructure. It can lead to a reduction in the need to travel, as key services are more accessible to local residents.
- The policy recognises the range of adverse amenity effects that can be caused by vehicle access and parking, and sets out strict requirements that proposals must meet. Generally, access arrangements that cause significant nuisance will not be permitted. This will have positive impacts for local residents.

The likely significant adverse effects of the SPD, which will require robust mitigation measures, include:

- Development of gardens may have adverse impacts on biodiversity, causing loss and fragmentation of wildlife habitats. Many gardens have an area set aside for wildlife and these are highly valued. They also provide people with a place to relax and an opportunity to get close to nature. Gardens vary in size across the Borough, but their value to wildlife increases when they are arranged in a block, and any development is likely to fragment this habitat.
- Projections of future climate change indicate that more frequent periods of long-duration rainfall could be expected and development of back gardens could increase our susceptibility to flooding. The effect of development is generally to reduce the permeability of at least part of the site. Surface water needs to be managed in a sustainable manner so that the risk of flooding is reduced.

## **How has the Sustainability Appraisal influenced the development of the SPD?**

The Sustainability Appraisal has been carried out as an integral part of producing the Draft Backland and Infill Development SPD and has provided input at each stage when decisions were taken. Integrating the Sustainability Appraisal from the outset was considered essential to ensure the SPD met the objectives of sustainable development.

### **Proposals for monitoring**

The actual significant effects of the SPD will be monitored and tested against those effects predicted in this Sustainability Appraisal. The Planning and Compulsory Purchase Act 2004 already requires Local Planning Authorities to produce Annual Monitoring Reports on progress in implementing Local Development Documents and this will include the findings of the Sustainability Appraisal Monitoring.

A number of indicators have been established to enable the significant effects to be monitored. These are listed in paragraph 5.7 of this report.

### **Conclusions**

The Sustainability Appraisal assessed the potential effects of both the SPD policies and the “saved” Local Plan policy. Policy DS6 covers standards of design and amenity for all types of development in the Borough and therefore has a much wider remit than the policies covering Backland and Infill Development. However, despite its narrower remit, the SPD has the potential to benefit a range of sustainability objectives, in particular:

- Using land efficiently and prioritising development on previously developed land
- Reducing the need to travel
- Reducing environmental pollution
- Provision of a safe and healthy environment
- Provision of a high quality built environment
- Maintaining the function and identity of individual settlements
- Conserving and enhancing the historic built environment

Production of the SPD is likely to further the achievement of sustainability objectives, leading to sustainable communities that are well designed and built in the right location, making efficient use of land but without compromising the quality of the local environment.

## **1. Introduction and background**

### **Introduction**

- 1.1 This Sustainability Appraisal Report outlines the findings of the Sustainability Appraisal of the Draft Backland and Infill Development Supplementary Planning Document (SPD). The two documents inform one another and should be read together.
- 1.2 Planning legislation has recently been updated under the Planning and Compulsory Purchase Act 2004 and it now requires that Local Planning Authorities prepare a Local Development Framework. This is the collective name for the portfolio of Local Development Documents that will provide the framework for delivering the spatial planning strategy.
- 1.3 SPDs provide policy guidance that amplifies the policies and proposals of the Local Development Documents. They form part of the planning framework for the area, but do not form part of the statutory development plan. The Draft Backland and Infill Development SPD will form part of the Local Development Framework for Swindon Borough.

### **Legal requirement for Sustainability Appraisal and Strategic Environmental Assessment (SEA)**

- 1.4 The integrated treatment of social, environmental and economic issues is a key principle of the Government's Sustainable Development Strategy and planning authorities are required to have regard to these considerations when preparing development plans. This Sustainability Appraisal has been carried out in line with Government guidance contained within "*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*" (ODPM, 2005) and "*The Strategic Environmental Assessment Directive: Guidance for Planning Authorities*" (ODPM, 2003).
- 1.5 Under Section 39(2) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal is mandatory for new or revised Development Plan Documents (DPDs) and SPDs. Local authorities 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 SEA Directive). This is transposed by the Environmental Assessment of Plans and Programmes Regulations 2004.

**Article 3(1) of Directive 2001/42/EC states "...an environmental assessment...shall be carried out for plans and programmes...which are likely to have significant environmental effects. An environmental assessment shall be carried out for all plans and programmes which are prepared for...town and country planning or land use".**

- 1.6 Sustainability Appraisal and SEA are derived from distinct legal requirements, but they have a high degree of overlap and involve a comparable number of stages. The Government advises that it is possible to satisfy both requirements through a combined appraisal approach. Throughout this report, where reference is made to Sustainability Appraisal, it relates to the combined process of Sustainability Appraisal and SEA, incorporating the requirements of European Directive 2001/42/EC.

### **Screening determination under the SEA Directive**

- 1.7 The need for screening determinations under the SEA Directive is most likely to arise with SPDs which cover a small area at local level or which make only minor modifications to existing policy. The Local Authority needs to consider whether there are likely to be any significant environmental effects.
- 1.8 Swindon Borough Council considers that the Draft Backland and Infill Development SPD may potentially lead to significant environmental effects and therefore, should be subjected to SEA under the SEA Directive.

### **Purpose of Sustainability Appraisal**

- 1.9 Sustainable development is the core principal underpinning the reformed planning system. At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations. Section 39 of the Planning and Compulsory Purchase Act 2004 requires the Council to “exercise the [spatial planning] function with the objective of contributing to the achievement of sustainable development”.
- 1.10 The principal purpose of Sustainability Appraisal is to promote sustainable development – it is a systematic process undertaken throughout the preparation of a plan or programme and the results will contribute to the reasoned justification of policies.
- 1.11 In its 2005 document ‘*Securing the future – delivering UK sustainable development strategy*’ (DEFRA, 2005), the Government outlined four priorities for immediate action across the UK:
- Sustainable consumption and production;
  - Climate change and energy;
  - Natural resource protection and environmental enhancement; and
  - Sustainable communities.
- 1.12 *Planning Policy Statement 1: Delivering Sustainable Development* (para. 24) states that “Planning authorities should ensure that sustainable development is treated in an integrated way in their development plans. In particular, they should carefully consider the

inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development”.

- 1.13 The role of Sustainability Appraisal is to assess the extent to which the emerging policies and proposals within the SPD will help to achieve relevant environmental, social and economic objectives. It provides an opportunity to identify and address any adverse effects that draft policies and proposals may have. With regards to the Backland and Infill Development SPD, Sustainability Appraisal is a key means of ensuring housing policies deliver sustainable development objectives, in particular, seeking to minimise environmental impact, taking account of climate change and flood risk.

### **Compliance with the SEA Directive/Regulations**

- 1.14 The Sustainability Appraisal Report on the Draft Backland and Infill Development SPD is a key output of the appraisal process, presenting information on the effects of the Draft SPD on which formal public consultation is carried out.
- 1.15 The Sustainability Appraisal Report must show that the SEA Directive’s requirements have been met. Appendix A of this report details where the particular requirements of the SEA Directive are addressed within the body of the report and related documents.
- 1.16 This Report follows on from the first stage of the Sustainability Appraisal which culminated in the production of a Draft Scoping Report. This established the context, objectives and baseline information for the Sustainability Appraisal for the Local Development Framework, and was issued for consultation in July 2006. This met the requirements of the SEA Directive, particularly Annex I (a,b,c,d,e) and Article 5.4 and 6.3.
- 1.17 A revised version of the Scoping Report was published in December 2006 and can be viewed on the Borough Council’s website at [www.swindon.gov.uk/sustainabilityappraisal](http://www.swindon.gov.uk/sustainabilityappraisal). Key parts of the Scoping Report that relate to this SPD are summarised in Section 3 of this report. However, the two reports should be read together as the Scoping Report forms an integral part of the appraisal process.
- 1.18 The Sustainability Appraisal Scoping Report and Sustainability Appraisal Report (including Non-Technical Summary) will together meet the requirements of Section 19(5) of the Planning and Compulsory Act 2004 and the SEA Directive.

## **The Draft Backland and Infill Development SPD**

- 1.19 The substantial rise in house prices over the past 10 years has enabled developers to secure value from land which in the past would not have been considered worthy of development. Much of this land is of an 'infill' or 'backland' nature.
- 1.20 Backland development is that which takes place on previously developed land within settlements, usually to the rear of existing properties. Infill development is normally located in a small gap in an otherwise built up frontage. Such development, however, has the potential to cause significant adverse impacts on the communities on which they are imposed. This SPD aims to prevent unacceptable harm to the appearance and pleasantness of these communities.
- 1.21 This SPD amplifies Policy DS6 of the Swindon Borough Local Plan 2011 and has been developed in accordance with a range of local, regional and national policy documents. These documents contain policy objectives or specific requirements that need to be taken account of in the production of Local Development Documents. A review of these documents can be found in Appendix 1 of the Revised Scoping Report.

### **National policy**

- PPS1: Delivering Sustainable Development.
- PPS3: Housing.
- Securing the Future: delivering UK sustainable development strategy.
- Sustainable Communities: Building for the Future.

### **Regional policy**

- Regional Planning Guidance for the South West.
- Draft Regional Spatial Strategy for the South West 2006-2026.
- The Way Ahead – Delivering Sustainable Communities in the South West.
- Creating Sustainable Communities in the South West.
- A Sustainable Future for the South West.

### **Local policy**

- The Wiltshire and Swindon Structure Plan 2016.
- The Swindon Borough Local Plan 2011.

### **Corporate policy**

- Our Swindon, Our Community, Our Future – a community strategy for Swindon 2004-2010.
- Making Swindon the UK's Best Business Location – Corporate Plan 2006-2010.
- Swindon Biodiversity Action Plan.

- The Seeds of Change – Swindon Borough's Local Agenda 21 Strategy.
- Swindon Principal Urban Area Study.

### **Appropriate Assessment**

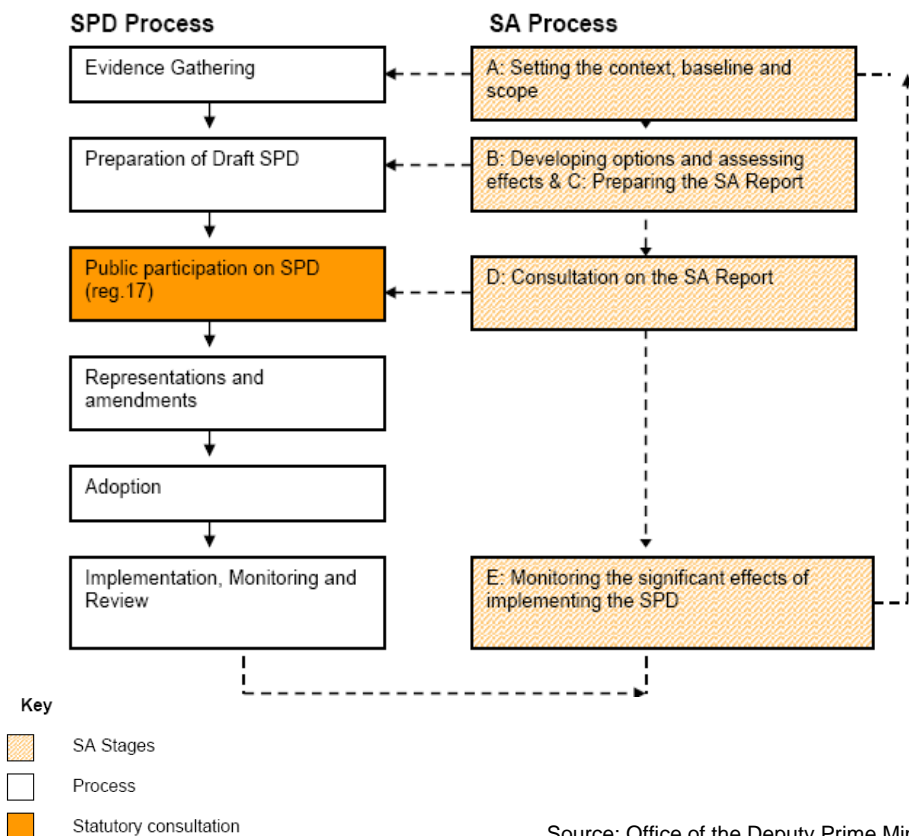
- 1.22 European Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive) requires an Appropriate Assessment (AA) to be undertaken to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects.
- 1.23 It is the responsibility of the Local Planning Authority to ensure that an Appropriate Assessment is carried out, if one is required for a particular Local Development Document. Natural England (previously English Nature) is the statutory nature conservation body for Appropriate Assessment.
- 1.24 Swindon Borough Council have been in consultation with Natural England to establish whether this SPD is likely to have significant effects on any European sites, either within or outside the area covered by the document. Natural England have advised the Council that this SPD is unlikely to have any significant effects on a European site, and therefore, an Appropriate Assessment is not required.

## 2. Appraisal Methodology

### Approach taken in carrying out the Sustainability Appraisal

2.1 The approach adopted in undertaking the Sustainability Appraisal is based on the process set out in Government guidance “*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*” (ODPM, 2005). The key stages undertaken in the preparation of the Sustainability Appraisal and Draft SPD are outlined in Table 2.1:

**Table 2.1 SPD and Sustainability Appraisal key stages.**



2.2 The Sustainability Appraisal Scoping Report produced during stage A of the process (see Table 2.1) involved the following stages:

- identification of the environmental, economic and social objectives contained in other plans and programmes that are relevant to the Local Development Framework;
- collection of sufficient information on the current and likely future state of the Borough, focussing on the social, environmental and economic characteristics that relate to the issues to be tackled in the Local Development Framework;

- consideration of the key sustainability issues and problems that the Local Development Framework should address in the pursuit of sustainable development; and
  - setting objectives against which draft policies and proposals may be assessed, and indicators against which progress towards meeting those objectives can be monitored in future.
- 2.3 The Scoping Report culminated in the production of a Sustainability Appraisal framework, containing a set of high-level ‘appraisal objectives’ for use in assessing the potential effects of emerging policies. This is discussed further in section 4 of this document – the framework is set out in Appendix 4 of the Scoping Report.
- 2.4 This Sustainability Appraisal Report represents Stages B and C of the process (see Table 2.1) and includes the following stages:
- Testing the Draft SPD objectives against the sustainability appraisal framework;
  - Developing the Draft SPD options;
  - Predicting and evaluating the effects of the Draft SPD;
  - Considering ways of mitigating adverse effects and maximising beneficial effects; and
  - Proposing measures to monitor the significant effects of implementing the SPD.

These stages are explained further in section 5 of this document.

- 2.5 This SPD supplements Policy DS6 of the Swindon Borough Local Plan 2011 – adopted in July 2006. The Revised Deposit Draft of the Local Plan was subjected to a Sustainability Appraisal and the findings of that appraisal have been taken into account during the preparation of this Sustainability Appraisal.
- 2.6 Government guidance advises that “the Sustainability Appraisal of the SPD of a saved plan will need to set out the likely significant social, environmental and economic effects of that saved policy it is helping to implement...this will provide the baseline against which the effects of the SPD can be considered” (ODPM, 2005). The effects of Policy DS6 are set out in Appendix 2 (option 2).

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

- 2.7 It is the responsibility of the Local Planning Authority to make sure a Sustainability Appraisal Report has been carried out in accordance with the SEA Directive, The Planning and Compulsory Purchase Act 2004

and the Regulations. This Sustainability Appraisal has been produced by officers of Swindon Borough Council working independently from, but in consultation with those responsible for production of the Draft SPD. As a result, the Sustainability Appraisal process was able to influence the content of the SPD.

### **When was the Sustainability Appraisal carried out?**

- 2.8 Work was undertaken on this Sustainability Appraisal Report throughout January 2007. This followed the close of the public consultation period for the Draft Scoping Report that ran from 24<sup>th</sup> July 2006 to 5<sup>th</sup> September 2006 and consequent amendments that were made to the baseline assessment, key sustainability issues and Sustainability Appraisal framework.

### **Difficulties encountered in carrying out the appraisal**

Annex I(h) of Directive 2001/42/EC states "...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information".

- 2.9 The main difficulty encountered during the preparation of this report concerns the prediction and evaluation of effects. The SPD contains requirements that developers and those submitting planning applications must follow. However, it does not specify particular locations for development. Significant effects can be described more effectively when the details of a particular development, its location, siting, shape, design, materials etc are known.
- 2.10 The Sustainability Appraisal has attempted to predict the nature of significant beneficial and adverse effects that will result from the SPD but their significance will vary depending on the individual circumstances of each proposed development. Describing effects in terms of geographical scale, whether they are likely to be temporary or permanent and what the secondary effects will be proved difficult. A large development of an infill or backland nature or a series of individual development proposals in the same area is likely to have significant adverse cumulative effects compared with a one-off development in a sustainable location.

### **3. Sustainability objectives, baseline and context**

#### **Baseline assessment**

- 3.1 Assessing baseline conditions in the Borough is an important part of Sustainability Appraisal and a legal requirement of the SEA Directive.

Annex I(b) and (c) of Directive 2001/42/EC states that “information to be provided under Article 5(1) is...the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan...and the environmental characteristics of areas likely to be significantly affected”.

- 3.2 Baseline data provides the basis for prediction and monitoring of environmental and other sustainability effects while identifying sustainability problems. A full description of baseline conditions and indicators for the Borough can be found in the Revised Scoping Report – section 3 and Appendix 2. The key sustainability issues facing the Borough are found in section 4 and Appendix 3 of that report.

- 3.3 Key aspects of the baseline assessment with relevance to this SPD include:

#### **Biodiversity, fauna and flora**

- 3.4 Maintaining a biodiversity rich environment can have positive impacts that add to the Borough’s community through the “added value” to both quality of life and economic attractiveness. It is important that species and habitat conservation are strongly considered within development plans.
- 3.5 The urban area of Swindon is under intense pressure to develop with a possible 35,000 additional dwellings to be built up to 2026 (Draft RSS, 2006). This creates pressure on wildlife habitats throughout the Borough.
- 3.6 Existing urban areas make up roughly 25% of the land area of the Borough. Many small, individual sites provide an isolated patch of potential wildlife habitat and together form a sizeable, complex mixture supporting a wealth of wildlife. Many private gardens have an area set aside for wildlife and these are highly valued.

#### **Land and water resources**

- 3.7 Focusing additional residential development on the urban area is a key objective of the Wiltshire and Swindon Structure Plan 2016 so as to minimise loss of greenfield land. The Swindon Borough Local Plan 2011 puts a clear emphasis on recycling and reusing previously developed land, with a target set of 40% of all dwelling completions to take place on previously developed land.

- 3.8 PPS3 advises local planning authorities to follow a search sequence when identifying sites to be allocated for housing. This should start with the re-use of previously developed land and buildings within urban areas identified by the urban housing capacity study.
- 3.9 The contribution that some previously developed land may have to nature conservation is an important consideration, and Draft PPS3 specifically excludes some previously developed land from housing targets where there is a clear reason that could outweigh the re-use of the site
- 3.10 The Urban Capacity Study, produced by Swindon Borough Council in 2003, confirmed that opportunities for developing previously developed land within the urban area are extremely limited. Swindon's comparatively recent growth is the major factor behind a general deficit of previously developed land and urban redevelopment opportunities in the town.

#### Pollution, air and climatic factors

- 3.11 Planning policy should ensure that all development proposals conform with the requirements of part III Statutory Nuisance and Clean Air of the Environmental Protection Act 1990. This includes development that is likely to lead to emissions of pollutants such as noise, light, vibration, smell, fumes, smoke, soot, ash, dust, grit or toxic substances that may adversely affect existing development and vulnerable wildlife habitats.

#### Inclusive communities

- 3.12 Local Plan Policy ENV8 states "development proposals should include appropriate provision to allow ease of access for everybody including provision of facilities for disabled people". All members of the community should be able to access buildings and their environs in a convenient manner – this includes people with disability and those with diminished mobility.
- 3.13 As Swindon has continued to demonstrate a buoyant economy, the cost of the average house has risen faster than incomes. Despite lower than average house prices in the Borough, in 2005, the average house price was still 6.8 times the average annual salary in the UK (National Statistics, 2005).

#### Healthy communities

- 3.14 Road safety has been highlighted specifically as one of the overarching objectives of the second Swindon Local Transport Plan. Making road use safer, particularly for vulnerable road users is one of the major objectives. In the past, road safety schemes have tended to concentrate on preventing the occurrence of injury but more emphasis

is now also being given to ensuring that people feel they can move around safely as pedestrians.

#### Development and growth

- 3.15 The Draft RSS has identified Swindon as a place that currently plays a critical strategic role regionally or sub-regionally, with the potential to achieve further significant sustainable development. Projections indicate that the Borough's population will rise to about 250,000 (under review) by 2026. These projections raise a number of issues that must be addressed to ensure that Swindon is able to provide an appropriate range of housing in the future.

#### Conservation and heritage

- 3.16 Swindon Borough has a rich variety of man-made historic features, including 28 Conservation Areas, more than 1,000 listed buildings and many other buildings of significant local interest. It is important that all designated historic assets should be considered together with potential impacts on non-designated features since these can make an important contribution to creating a sense of place and local identity.
- 3.17 The landscape is a finite natural resource and represents an integral bond between people and places, giving the population of the Borough their identity and a sense of place related to their surroundings. One of the key issues for the Borough is how to reconcile the needs of sustainable development, meeting the social and economic requirements of all sections of the community, whilst respecting and preserving the intrinsic qualities of the landscape.

#### Economic development and employment

- 3.18 An attractive and well-designed environment can help attract people to the Borough and help attract inward investment.

#### **Sustainability Appraisal framework – objectives and indicators**

- 3.19 The Sustainability Appraisal framework provides a way in which sustainability effects can be described, analysed and compared. It contains a set of high-level 'sustainability objectives' for use in assessing the potential effects of emerging policies on environmental, social and economic conditions. The framework was originally published for consultation in July 2006, as part of the Scoping Report, and has since been amended in light of representations received.
- 3.20 Sustainability objectives are distinct from the objectives of the Draft SPD. They were derived from a number of different sources, including national and regional sustainability objectives, a review of relevant plans and strategies, the review of baseline conditions in the Borough and from objectives contained within the Swindon Community Strategy

and Swindon Borough Council Corporate Plan. The 17 objectives are shown in table 3.1:

**Table 3.1 – Sustainability objectives**

<b>Sustainability objective</b>
1. Maintain and enhance biodiversity and avoid irreversible losses
2. Use land and existing buildings efficiently and prioritise development on previously developed land
3. Promote sustainable waste management solutions
4. Use and manage water resources in a sustainable manner
5. Reduce the need to travel and promote more sustainable forms of transport
6. Reduce impacts on climate change through energy efficiency measures and promotion of renewable energy solutions
7. Reduce environmental pollution
8. Reduce social exclusion and poverty
9. Provide decent and affordable housing for everyone
10. Provide a safe and healthy environment in which to live
11. Provide a high quality built environment
12. Maintain the identity and function of individual settlements
13. Conserve and enhance the historic built environment and archaeological assets
14. Conserve and enhance rural and urban landscapes
15. Promote a sustainable, diverse and vibrant sub-regional economy
16. Provide opportunities for a highly skilled and educated workforce
17. Enhance the image and role of Swindon's Central Area as a sub-regional centre and destination

- 3.21 The full framework is outlined in Appendix 4 of the Scoping Report. The framework features a series of detailed decision-making questions and indicators - decision-making questions help to clarify the sustainability issues relevant to each objective whilst indicators will be used in monitoring the implementation of the SPD.
- 3.22 It was considered useful to test the internal compatibility of the sustainability objectives. This was done to see if there were tensions between objectives that couldn't be resolved and to clarify these so that subsequent decisions are well based. The compatibility matrix is outlined in Appendix C of this report.
- 3.23 The matrix shows a number of potential conflicts between sustainability objectives. The main areas of concern involve Objectives 9 and 15 and these concerns are explained further in Section 5 of the Scoping Report.

#### 4. SPD options and significant effects

Article 5(1) of Directive 2001/42/EC states “an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan...and reasonable alternatives taking into account the objectives and the geographical scope of the plan...are identified, described and evaluated”. Information to be provided in the Environmental Report includes “an outline of the reasons for selecting the alternatives dealt with” (Annex I(h)).

4.1 In this section, options are considered that help to achieve the objectives of the Draft SPD. The likely sustainability effects of the Draft SPD are then predicted and evaluated, and ways of mitigating adverse effects and maximising beneficial effects are considered.

#### Testing Draft SPD objectives against sustainability objectives

4.2 Government guidance on Sustainability Appraisal recommends that the SPD objectives are tested for compatibility against the sustainability objectives, to ensure that they are compatible with sustainability principles and to help in identifying options. The Backland and Infill Development SPD, however, does not contain a set of objectives. It may be worthwhile to establish a set of objectives in order to clearly set out what the SPD is aiming to achieve in spatial planning terms and to set the context for developing options.

4.3 The overall aim of the SPD is to ‘prevent unacceptable harm to the appearance and pleasantness of the communities upon which infill and backland development are imposed’. This aim has been tested for compatibility against the sustainability objectives in the table below:

**Table 4.1 Compatibility matrix – SPD aim and sustainability objectives**

Key:		Backland and Infill Development SPD aim: <i>to prevent unacceptable harm to the appearance and pleasantness of the communities upon which infill and backland development are imposed.</i>
✓	Aim considered compatible	
✗	Aim considered incompatible	
~	No clear links	
?	Effects uncertain	
Sustainability objectives	1. Biodiversity	✓
	2. Land and building efficiency	✓
	3. Waste	~
	4. Water	~
	5. Transport/travel	✓
	6. Climate change and energy	~
	7. Pollution	✓
	8. Social exclusion and poverty	~
	9. Housing	✓
	10. Safe and healthy environment	✓
	11. Quality built environment	✓
	12. Individual settlements	✓
	13. Historic environment	✓
	14. Rural and urban landscapes	✓
	15. Sustainable economy	✓
	16. Education and skills	~
	17. Swindon’s Central Area	~

Note : See table 3.1 for sustainability objectives.

- 4.4 The matrix confirms the general compatibility between the aim of the SPD and the sustainability objectives, and has not highlighted any particular issues of concern. However, this aim is very general in nature and this exercise serves only to give a brief outline of where conflicts may arise.

#### **Common use of Sustainability Appraisal information for SPDs**

- 4.5 Government guidance advises that “the Sustainability Appraisal of the SPD of a saved plan will need to set out the likely significant social, environmental and economic effects of that saved policy it is helping to implement” (ODPM, 2005). This will provide the baseline against which the effects of the SPD itself can be considered.
- 4.6 The Backland and Infill Development SPD amplifies Policy DS6 of the Swindon Borough Local Plan 2011 - adopted in July 2006. A Sustainability Appraisal of the Revised Deposit Draft was carried out by Enfusion in October 2003 and there were no significant changes to this policy before adoption. A Strategic Environmental Assessment was not required because the first formal preparatory act took place before 21<sup>st</sup> July 2004 and the Local Plan was adopted before 21<sup>st</sup> July 2006.
- 4.7 The likely significant effects of Policy DS6, as specified in the October 2003 Sustainability Appraisal, are listed below. Please refer to this policy in the Local Plan and the relevant Sustainability Appraisal for further information.

#### **Swindon Borough Local Plan 2011 - Policy DS6: Standards of Design and Amenity**

- Incorporating design elements including siting, scale, mass, materials, colours as well as consideration of and maintenance of at least existing amenity will help improve the built environment;
- Good design can help increase the Borough’s competitive advantage and make the Borough a more attractive place to relocate to for businesses and individuals. Well designed developments will also be more attractive to consumers;
- Incorporating design which minimises chances of criminal activity into the early design stages of a development can help to reduce crime and the fear of crime;
- Respecting and accommodating any existing features of acknowledged importance will help to promote local identity and sense of place. Protection of existing amenity will reduce impacts of new developments on existing communities. Special access needs for the disabled are addressed;

- Designing for energy efficiency can help to cut heating and lighting levels, with a commensurate reduction in power generation related emissions;
- Energy efficiency is considered through development layout and design; and
- Non-monetary factors are being taken into account in terms of design. Some of the benefits may not be easy to measure but can have long term positive effects.

The Sustainability Appraisal did not find any areas of conflict with this policy and the achievement of the sustainability objectives.

### **Alternative options considered**

- 4.8 Given the duty under the Planning and Compulsory Purchase Act 2004 on those preparing an SPD to contribute towards sustainable development, it is essential for it to set out to improve on the situation that would exist if there were no SPD. The SPD should also aim to improve on the effects of implementing the existing ‘saved plan policies’. Government guidance (ODPM, 2005) states that “only reasonable, realistic and relevant options need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the sustainability implications of each”.
- 4.9 The Draft SPD covers a number of themes but is not site specific and does not allocate land. The SPD does not consider different options to the requirements specified and it is difficult to conceive of alternative options that are “realistic and relevant” and that would lead to “meaningful comparisons”.
- 4.10 In this report, the contents of the Draft SPD have been compared against a ‘business as usual’ scenario – a scenario that would involve continued application of existing ‘saved’ policies with no additional guidance in the form of an SPD. These two options have been compared with each other and against the Sustainability Appraisal framework, and are detailed in Appendix B.

### **Predicting and evaluating the effects of the options**

Annex I (f, g) of Directive 2001/42/EC states “ the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors...these effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects”

- 4.11 In this section, the social, environmental and economic effects of the options being considered in this appraisal are predicted. Prediction of effects involves identifying the changes to the sustainability baseline of

the Borough that are predicted to arise from the SPD, including the 'business as usual' scenario.

4.12 Having identified and described the likely effects, their significance has been evaluated. Forming a judgement on whether an effect is likely to be significant involved considering the probability, duration and frequency of the effect, including secondary, cumulative and synergistic effects. Likely effects are detailed in Appendix B of this report, compared against the relevant sustainability objective.

Each effect has been assessed over a short, medium and long-term period using the following scale:

++	Very positive	+	Positive
-	Negative	--	Very negative
0	Little or no effect	?	Effects uncertain

4.13 The Backland and Infill Development SPD has acknowledged that these type of developments can lead to a number of sustainability issues. The key issues include:

- Development that fails to harmonise with the character of the area and surroundings, including design, layout, use of materials and landscaping;
- Loss of garden space can potentially impact upon the amenity of an area. The Council regards appropriate garden size as an essential part of the amenity of a neighbourhood;
- Reduction in amenity – the main concerns being noise and disturbance, reductions in daylight and sunlight, overshadowing, privacy and overlooking;
- Issues regarding access and parking, including road safety concerns;
- Loss of trees, hedges and other biodiversity features, and a general reduction in green spaces; and
- Effects on the historic built environment, including Conservation Areas and Listed Buildings.

4.14 In Appendix B, the likely significant **positive** effects of the SPD have been highlighted and these are summarised below:

### **Biodiversity**

4.15 Policies within the SPD stress the importance of maintaining appropriate garden size, and retention of mature trees and hedges. Gardens are important for amenity and recreational space and they

provide important habitats for wildlife. Many gardens provide local people a space to relax and an opportunity to get close to nature. Existing urban areas provide major opportunities for biodiversity conservation. The retention of mature trees and hedges and the requirement for an assessment to be carried out on gardens rich in biodiversity may have significant positive effects.

### **Previously developed land**

- 4.16 The Structure Plan 2011 allocates a requirement to Swindon of about 23,000 dwellings in the period 1991-2011 and the Swindon Urban Capacity Study confirmed that opportunities to develop previously developed land within the town are extremely limited. Development of backland and infill sites represents an important opportunity for achieving housing targets in sustainable locations.
- 4.17 Government policy is to ensure that housing is developed in suitable locations. This should be achieved by making effective use of land and prioritising development on previously developed land with good access to jobs, key services and infrastructure. PPS3 defines previously developed land as that which includes the curtilage of the developed land, which includes back gardens. Development of backland sites is considered to be an efficient use of land and may reduce pressure to develop greenfield sites outside the urban area.

### **Reducing the need to travel**

- 4.18 Development of infill and backland sites in the urban area that are likely to benefit from good public transport accessibility will help reduce the need to travel by private car, possibly leading to a reduction in carbon emissions.

### **Amenity**

- 4.19 The SPD sets strict requirements for reducing the effects on amenity, including noise, overshadowing and loss of privacy, caused by backland and infill developments. Effects on amenity can cause serious concerns among local residents who are affected by these types of development. This guidance substantially improves on Policy DS6, setting requirements for plot width, building size and form, visual separation, views, frontage depth, access, boundary treatment, piecemeal and tandem development.

### **Urban landscapes**

- 4.20 The SPD states that tandem development, where a new dwelling is placed immediately behind an existing dwelling on smaller sized plots or sharing the same access, will not normally be permitted. Tandem development will be strictly limited to situations where the amenities of all surrounding dwellings can be safeguarded. This will have important

consequences for the protection of natural landscapes in the urban area, as a positive decision regarding one proposal may lead to a rash of similar proposals in the same area. This could not only lead to loss of amenity but loss of informal areas of open space.

### **Design**

- 4.21 The SPD states that such development will require particular care in its design and layout to avoid conflict with existing properties. Good design can help achieve sustainability and add quality to the built environment. Attention to design can also further promote sustainable patterns of development and the better use of previously developed land. PPS3 states that proposed developments should be well integrated and complement the neighbouring buildings and the local area generally in terms of scale, density, layout and access. The SPD reflects this policy and should lead to positive impacts in the Borough.

### **Health issues**

- 4.22 The SPD deals effectively with the issues of noise and road safety problems caused by access and car parking. This is likely to have positive impacts for local residents' quality of life. It states that access arrangements that cause significant nuisance will not be permitted and that each application will be looked at by the Council's Transport Planning team. This should ensure that access proposals are appropriate to the development and location.

### **Historic environment**

- 4.23 Policies are likely to have positive impacts for Conservation Areas and Listed Buildings. Policy states that any development in a Conservation Area will be judged on its effect on the area's character and appearance and that the advice of the Conservation Officer must be sought.
- 4.24 The predicted significant **adverse effects and concerns** of the SPD are also highlighted in Appendix B and these are summarised below:

### **Biodiversity**

- 4.25 The biodiversity value of gardens should be further emphasised under the section 'Garden amenity'. Each small, individual site provides an isolated patch of potential wildlife habitat and together, these form a sizeable, complex mixture supporting much wildlife in the urban area.
- 4.26 Gardens vary in size throughout the Borough but their value to wildlife increases when they are arranged in a block, and this is the case in many residential areas in Swindon. Any backland and infill development is likely to fragment this habitat and lead to a reduced biodiversity value. The requirement for an assessment to assess the

value of the land is positive but further details are required as to what form this assessment should take, how detailed it should be and when it is required. How will it be assessed whether or not a garden is rich in biodiversity?

- 4.27 Significance of adverse effects is likely to increase with increased numbers of backland developments, causing further fragmentation of habitats. Any environmental assessment will need to look at the cumulative effects that may be caused.

### **Flood risk**

- 4.28 Gardens contribute significantly to reducing the effects of surface water run-off. The effect of development is generally to reduce permeability on at least part of the site. Effective disposal of surface water is a material planning consideration in determining proposals and appropriate surface water drainage arrangements are required. This issue could be emphasised in the SPD.

- 4.29 Adverse effects are likely if adequate drainage systems are not installed, and these effects could be cumulative if more backland sites are developed in a particular location. Significance will depend on location of individual developments and drainage proposals. A requirement for use of Sustainable Urban Drainage Systems would help reduce potential flood risk problems from development of backland sites.

### **Historic environment**

- 4.30 The Policy regarding Conservation Areas and Listed Buildings is positive and states that the Council has a statutory duty to preserve and enhance the character and appearance of Conservation Areas and Listed Buildings. However, the policy would be more effective if it included more information on Listed Buildings, or referred the reader to Policies ENV1 and ENV2 of the Local Plan. It is also possible that developments that are outside a Conservation Area may have adverse impacts – at present, this policy just refers to proposals that are in a Conservation Area.

### **Proposed mitigation measures and recommendations**

Annex I(g) of Directive 2001/42/EC requires “the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme”

- 4.31 The Sustainability Appraisal Report must include measures to deal with the adverse effects of implementing the SPD. This may include changes to the SPD as a whole or refining individual policies. The following mitigation measures are recommended to help prevent, reduce or offset any significant adverse effects the SPD may have:

- At present, policy tends to focus on the amenity value of gardens and the retention of mature trees and hedges where they have high amenity value or help maintain privacy. The SPD could further emphasise the value of gardens and trees/hedges for biodiversity and in providing habitats for wildlife, in accordance with PPS3 where development 'provides for the retention or re-establishment of the biodiversity within residential environments.
- More emphasis on the important role gardens and natural areas have in controlling surface water run-off and reducing flood risk. Projections of future climate change indicate that more frequent periods of long-duration rainfall could be expected and loss of green spaces could increase our susceptibility to flooding. Significant cumulative effects are possible as permeable surfaces are lost. Policy could require proposals to consider incorporation of Sustainable Urban Drainage Systems.
- Policy regarding retention of trees and hedges could be further clarified, particularly regarding Tree Preservation Orders (TPOs). Over 2000 trees within the Borough are currently protected by TPOs. Guidance on how people submitting proposals can find out about TPOs could be included in the relevant section of the SPD.
- More emphasis could be given to the effects of development on Listed Buildings, and recognition that development outside Conservation Areas could potentially have adverse effects.

## 5. **Conclusions**

- 5.1 The Sustainability Appraisal has been carried out as an integral part of producing the Draft Backland and Infill Development SPD and has provided input at each stage of production. Integrating the Sustainability Appraisal from the outset was considered essential to ensure the SPD met the objectives of sustainable development.
- 5.2 The Sustainability Appraisal assessed the potential effects of both the SPD policies and the “saved” Local Plan policy. Policy DS6 covers standards of design and amenity for all types of development in the Borough and therefore has a much wider remit than the policies covering Backland and Infill Development. However, despite its narrower remit, the SPD has the potential to benefit a range of sustainability objectives, in particular:
- Using land efficiently and prioritising development on previously developed land
  - Reducing the need to travel
  - Reducing environmental pollution
  - Provision of a safe and healthy environment
  - Provision of a high quality built environment
  - Maintaining the function and identity of individual settlements
  - Conserving and enhancing the historic built environment
  - Conserving and enhancing rural and urban landscapes
- 5.3 The main difference between the two sets of policies is that the SPD provides more detailed guidance on specific issues, together with a checklist that applicants can use when considering these types of developments. Production of the SPD is likely to further the achievement of sustainability objectives, leading to sustainable communities that are well designed and built in the right location, making efficient use of land but without compromising the quality of the local environment.
- 5.4 This appraisal has highlighted a number of potentially adverse effects, and mitigation measures suggested to minimise these effects. The most significant adverse effects of the SPD are likely to be:
- Loss of green space, leading to loss of biodiversity and fragmentation of existing wildlife habitat;

- Increased flood risk due to loss of permeable surfaces; and
- Adverse effects on Conservation Areas from developments located outside the boundary of a Conservation Area.

### Proposals for monitoring

**Article 10(1) of Directive 2001/42/EC requires that Local Authorities “monitor the significant environmental effects of the implementation of plans...in order...to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action”.**

- 5.5 Monitoring allows the actual significant effects of implementing the SPD to be tested against the predicted effects. It can lead to more informed decision-making and acts as a useful source of baseline information.
- 5.6 The Planning and Compulsory Purchase Act already requires Local Planning Authorities to produce Annual Monitoring Reports on progress in implementing Local Development Documents and this will include the findings of the Sustainability Appraisal Monitoring.
- 5.7 The Sustainability Appraisal framework includes a list of indicators that will be used to monitor the Local Development Framework. A number of these are relevant to this SPD and these are listed below. These indicators will be reviewed after the consultation period to ensure the most relevant indicators are used for monitoring.

- % dwellings and/or development completed on previously developed land
- % new residential developments meeting set standards in accordance with WHO Environmental Health Criteria 12 (Noise)
- % of residents who are satisfied with their neighbourhood as a place to live
- No. of developments winning design/architectural awards
- Development refused through non-compliance with design standards
- No. of listed buildings or listed features lost or damaged through development

### Consultation arrangements

- 5.8 Further details regarding the consultation process for the Scoping Report can be found in that report, which can be viewed or downloaded at [www.swindon.gov.uk/sustainabilityappraisal](http://www.swindon.gov.uk/sustainabilityappraisal). The purpose of the consultation was to ensure that the approach to the Sustainability Appraisal was comprehensive and addressed all relevant issues and objectives for the Borough.

**Article 6(2) of Directive 2001/42/EC states “The authorities with relevant environmental responsibilities and the public...shall be given an early and effective opportunity...to express their opinion on the draft plan and the accompanying report before the adoption of the plan”**

- 5.9 This Sustainability Appraisal Report will be made available for public consultation at the same time as the Draft SPD (in line with Local Development Regulation 17). It should be made clear that any responses should focus on the effects of the SPD and not the effects of the 'saved' policy (Policy DS6) that the SPD is helping to implement. Consultation responses to both documents will be taken into account and the decision-making process documented.
- 5.10 If significant changes are made to the Draft SPD after the consultation period, it will be necessary to appraise the significant social, environmental and economic effects of these changes.
- 5.11 Following the adoption of the SPD, a consultation statement will be prepared to show the ways in which responses have been taken into account. This will make clear how the SPD was changed as a result of the Sustainability Appraisal process or why no changes were made.

### **Next steps in the Sustainability Appraisal process**

- 5.12 The next steps in the Sustainability Appraisal process will involve:
- Taking into account the consultation responses and documenting the decision-making process.
  - Appraisal of any significant changes made to the Draft SPD as a result of the consultation.
  - Following the adoption of the SPD, a consultation statement will be prepared to show the ways in which responses to the consultation have been taken into the account. This will provide enough information to make clear how the SPD was changed as a result of the Sustainability Appraisal process and responses to consultation, or why no changes were made.
  - Monitoring of the significant effects of the SPDs, as detailed earlier in this section, will continue during the lifetime of the plan.

## Appendix A - Compliance with the requirements of the SEA Directive.

The Sustainability Appraisal report incorporates the requirements for an Environmental Report under the Environmental Assessment of Plans and Programmes Regulations 2004. These regulations transpose the Strategic Environmental Assessment (SEA) Directive 2001/42/EC into English Law.

This table indicates where the material required for the purposes of Article 5(1) of Directive 2001/42/EC can be found within the Sustainability Appraisal report and Scoping Report.

Information required in the Environmental Report	Relevant section(s)
1. An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Section 1 of the Sustainability Appraisal Report.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 3 of the Sustainability Appraisal Report.
3. The environmental characteristics of areas likely to be significantly affected;	Scoping Report section 3 and appendix 2.
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Scoping Report sections 3 and 4 and appendices 2 and 3.
5. The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Scoping Report section 2 and appendix 1.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 4 and Appendix B of the Sustainability Appraisal Report.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 4 of the Sustainability Appraisal Report.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 2 and 4 of the Sustainability Appraisal Report.
9. A description of measures envisaged concerning monitoring in accordance with Article 10;	Section 5 of the Sustainability Appraisal Report.
10. A non-technical summary of the information provided under the above headings.	Non-technical summary located at the beginning of this report.

<b>Appendix B - OPTION 1: Production of Draft Backland and Infill Development SPD</b>					
<b>Key to significant effects: ++ Very positive + Positive 0 Little or no effect - Negative -- Very negative ? Effects uncertain</b>					
<b>Sustainability Appraisal objective</b>	<b>Identification and description of likely significant social, environmental and economic effects</b>	<b>Time period over which effects are likely to occur</b>			<b>Evaluation of significance of potential effects, including secondary, cumulative, synergistic, permanent, temporary, positive and negative effects.</b>
		<b>Short term 0-5 Yrs.</b>	<b>Medium term 5-10 Yrs.</b>	<b>Long term 10-15+ Yrs.</b>	
<b>1. Maintain and enhance biodiversity and avoid irreversible losses</b>	SPD acknowledges that gardens often contain areas rich in biodiversity and that an assessment will be required where this is the case. Policy also seeks to retain mature trees and hedges. However, the SPD could further acknowledge the wildlife amenity value of back gardens. Gardens act as important 'stepping stone' habitats and together form a sizeable, complex mixture of habitats in the Borough. With pressure to develop previously developed land, effects on biodiversity are uncertain as a result of this policy.	+/- ?	+/- ?	+/- ?	Likely to be positive effects on biodiversity if important features are retained on site. However, the SPD does not stipulate how 'richness' of biodiversity will be measured and in what circumstances an assessment will be needed. How detailed will this assessment need to be? Negative effects are more likely to be avoided if the importance of gardens for providing habitats is acknowledged. Negative effects likely to increase as more habitats are lost. <b>Positive or negative effect:</b> Both <b>Potential significance of effect:</b> High <b>Permanent or temporary:</b> Permanent
<b>2. Use land and existing buildings efficiently and prioritise development on previously developed land</b>	PPS3 states that "priority for development should be previously developed land". This SPD is promoting development on previously developed land that is within existing residential areas, thereby protecting agricultural land in the countryside and important areas of open space in the urban area. The requirement for development not to be piecemeal will avoid prejudicing satisfactory development of a larger area. Requirement for high quality design could also lead to more efficient use of land without compromising the quality of the local environment.	++	++	++	Backland sites are regarded as previously developed land and this policy is therefore likely to have positive effects on the achievement of this objective. Densities will be maximised in existing residential areas – these locations could be argued to be more sustainable as they are close to existing services and facilities. <b>Positive or negative effect:</b> Very positive. <b>Potential significance of effect:</b> High <b>Permanent or temporary:</b> Permanent
<b>3. Promote sustainable waste management solutions</b>	Little or no effects envisaged.	0	0	0	Little or no effects envisaged. <b>Positive or negative effect:</b> - <b>Potential significance of effect:</b> - <b>Permanent or temporary:</b> -
<b>4. Use and manage water resources in a sustainable manner</b>	Backland sites contribute significantly to reducing the effects of surface water run-off. The effect of development is generally to reduce permeability on at least part of the site. Effective disposal of surface water is a material planning consideration in determining proposals. Appropriate surface water drainage arrangements are required.	- ?	- ?	- ?	Negative effects are likely if appropriate drainage systems are not installed. Effects could be cumulative as more backland sites are developed. Significance will depend on location of individual developments and drainage proposals. Requirement for Sustainable Urban Drainage Systems would be welcome. <b>Positive or negative effect:</b> Negative but depends on circumstances <b>Potential significance of effect:</b> Medium <b>Permanent or temporary:</b> Permanent

<b>Appendix B - OPTION 1: Production of Draft Backland and Infill Development SPD</b>					
<b>Key to significant effects: ++ Very positive + Positive 0 Little or no effect - Negative -- Very negative ? Effects uncertain</b>					
<b>Sustainability Appraisal objective</b>	<b>Identification and description of likely significant social, environmental and economic effects</b>	<b>Time period over which effects are likely to occur</b>			<b>Evaluation of significance of potential effects, including secondary, cumulative, synergistic, permanent, temporary, positive and negative effects.</b>
		<b>Short term 0-5 Yrs.</b>	<b>Medium term 5-10 Yrs.</b>	<b>Long term 10-15+ Yrs.</b>	
<b>5. Reduce the need to travel and promote more sustainable forms of transport</b>	PPS3 indicates a preference for using land within existing urban areas. The SPD follows that guidance. Developing sites within existing residential means they are likely to be easily accessible and well connected to existing public transport facilities, shops and community facilities, thereby reducing the need to travel by private car.	+	+	+	Although positive, effects not likely to be highly significant unless very high number of dwellings built in very sustainable locations. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> low <b>Permanent or temporary:</b> permanent
<b>6. Reduce impacts on climate change through energy efficiency measures and promotion of renewable energy solutions</b>	The SPD highlights the use of building materials and design that are in harmony with their surroundings, to avoid conflict with existing properties. The SPD could also highlight the importance of high quality design in maximising energy efficiency and use of sustainable construction materials. This would further increase achievement of this objective.	0 +	0 +	0 +	The SPD as it stands will have little effect on this objective. However, if further requirements are specified regarding design and materials, more significant benefits could be achieved. Energy efficiency from solar passive gain is likely to be affected if there are problems of overshadowing. <b>Positive or negative effect:</b> Positive but some uncertain effects <b>Potential significance of effect:</b> Low <b>Permanent or temporary:</b> ?
<b>7. Reduce environmental pollution</b>	The SPD gives clear guidance on acceptable levels of amenity, overshadowing, privacy and overlooking and nuisance caused by vehicle access. In particular, tandem development is discouraged because of problems with noise disturbance, loss of amenity and overlooking.	+	++	++	Significant positive effects likely if design and location standards are followed. However, levels of noise, overshadowing and other forms of nuisance depend on levels of development and its location. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> High <b>Permanent or temporary:</b> permanent
<b>8. Reduce social exclusion and poverty</b>	No significant effects envisaged. However, developing within existing residential areas may allow easier access to community facilities and public transport routes, making travel easier for people without access to a car. Access for disabled people is mentioned briefly but could be expanded.	0 +	0 +	0 +	No significant effects envisaged. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> low <b>Permanent or temporary:</b> ?
<b>9. Provide decent and affordable housing for everyone</b>	This policy does promote development of additional dwellings which will increase the supply and mix of housing in the Borough. Specifying high design standards will also help provision of decent housing. Policies on affordable housing are covered elsewhere in the Local Plan.	+	+	+	Positive effects likely but not on a significant scale. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> Low <b>Permanent or temporary:</b> permanent

<b>Appendix B - OPTION 1: Production of Draft Backland and Infill Development SPD</b>					
<b>Key to significant effects: ++ Very positive + Positive 0 Little or no effect - Negative -- Very negative ? Effects uncertain</b>					
<b>Sustainability Appraisal objective</b>	<b>Identification and description of likely significant social, environmental and economic effects</b>	<b>Time period over which effects are likely to occur</b>			<b>Evaluation of significance of potential effects, including secondary, cumulative, synergistic, permanent, temporary, positive and negative effects.</b>
		<b>Short term 0-5 Yrs.</b>	<b>Medium term 5-10 Yrs.</b>	<b>Long term 10-15+ Yrs.</b>	
<b>10. Provide a safe and healthy environment in which to live</b>	Problems such as noise, loss of privacy and overshadowing can have detrimental impacts on peoples' health and quality of life. This SPD covers these issues in detail and also aims to reduce problems of access leading to road safety issues.	+	+	+	Policy should have a positive impact on controlling the adverse effects of infill and backland development. However, any additional development will lead to increased levels of noise and levels of traffic which must be managed appropriately in order to maintain residents' quality of life. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> medium <b>Permanent or temporary:</b> Uncertain.
<b>11. Provide a high quality built environment</b>	Policies within the SPD will increase the quality of the built environment, where developments are designed to harmonise with their surroundings and their layout reflects the characteristics of the area. It is important that landscaping is adequate and biodiversity features are retained, including mature trees and hedges. Policy stresses that the general level of quality of the environment must be maintained.	+ ?	+ ?	+ ?	Significant positive effects envisaged, however, any development is likely to have some effect on the amenity of an area. High quality design of developments is likely to lead to quality design of future developments in the same area. Development at too high a density could lead to adverse effects, depending on the area and location of development. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> high <b>Permanent or temporary:</b> permanent
<b>12. Maintain the identity and function of individual settlements</b>	No significant effects envisaged regarding function. Some types of new development can help to enhance the character of an area. The SPD does not specify site locations – any effects will depend on particular proposal. SPD gives detailed guidance on design and materials, layout, amenity and matters relating to Conservation Areas and Listed Buildings so that any adverse effects can be avoided.	+ ?	+ ?	+ ?	This SPD should help avoid any adverse effects on the identity and function of a settlement or area. Effects will depend on location, design and materials of any proposal. <b>Positive or negative effect:</b> Positive <b>Potential significance of effect:</b> Uncertain <b>Permanent or temporary:</b> permanent
<b>13. Conserve and enhance the historic built environment and archaeological assets</b>	Policies should help protect and enhance the historic environment, particularly as it requires the advice of the Council's Conservation Officer to be sought at the earliest possible stage. SPD confirms that the best solution may be to use the same materials that were used to build the surrounding housing. Policies could be stronger with regards Listed Buildings and buildings of significant local interest.	+	+	+	Proposals will be judged on their effect on an area's character and appearance which should lead to positive effects. Stronger guidance regarding Listed Buildings would ensure that any development enhances these buildings. Impacts not expected to be significant, but depends on scale of development and location. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> Low <b>Permanent or temporary:</b> permanent

<b>Appendix B - OPTION 1: Production of Draft Backland and Infill Development SPD</b>					
<b>Key to significant effects: ++ Very positive + Positive 0 Little or no effect - Negative -- Very negative ? Effects uncertain</b>					
<b>Sustainability Appraisal objective</b>	<b>Identification and description of likely significant social, environmental and economic effects</b>	<b>Time period over which effects are likely to occur</b>			<b>Evaluation of significance of potential effects, including secondary, cumulative, synergistic, permanent, temporary, positive and negative effects.</b>
		<b>Short term 0-5 Yrs.</b>	<b>Medium term 5-10 Yrs.</b>	<b>Long term 10-15+ Yrs.</b>	
<b>14. Conserve and enhance rural and urban landscapes</b>	Residential gardens form an important part of the landscape in an urban area. They have a high amenity value and include important habitats for wildlife. The SPD requires that proposals should be designed to harmonise with their surroundings and appear to naturally 'belong'. This should prevent any adverse effects. If tandem developments meet the specified criteria, however, it is unclear what level of development will be permitted in the Borough, with pressure to develop such sites in the urban area.	+ / - ?	+ / - ?	+ / - ?	Requirements in maintaining character are strong in the SPD, but natural landscapes and gardens within the urban area could be adversely affected if too much backland development is permitted. The SPD specifies requirements for individual developments but gives no indication of the level of backland/infill that will be permitted throughout the Borough. Permitting one development may lead to a rash of applications with an adverse cumulative effect. <b>Positive or negative effect:</b> Unknown <b>Potential significance of effect:</b> High <b>Permanent or temporary:</b> permanent
<b>15. Promote a sustainable, diverse and vibrant sub-regional economy</b>	Little or no effects envisaged.	0	0	0	Little or no effects envisaged. <b>Positive or negative effect:</b> N/A <b>Potential significance of effect:</b> little or no significance. <b>Permanent or temporary:</b> N/A
<b>16. Provide opportunities for a highly skilled and educated workforce</b>	Little or no effects envisaged.	0	0	0	Little or no effects envisaged. <b>Positive or negative effect:</b> N/A <b>Potential significance of effect:</b> little or no significance. <b>Permanent or temporary:</b> N/A.
<b>17. Enhance the image and role of Swindon's Central Area as a sub-regional centre and destination</b>	Little or no effects envisaged for Swindon's Central Area.	0	0	0	Little or no effects envisaged. <b>Positive or negative effect:</b> N/A <b>Potential significance of effect:</b> little or no significance. <b>Permanent or temporary:</b> N/A
<b>Overall effect over time</b>		+	+	+	

<b>Appendix B - OPTION 2: 'Business as usual' (continued application of existing 'saved' Policy DS6)</b>					
<b>Key to significant effects: ++ Very positive + Positive 0 Little or no effect - Negative -- Very negative ? Effects uncertain</b>					
<b>Sustainability Appraisal objective</b>	<b>Identification and description of likely significant social, environmental and economic effects</b>	<b>Time period over which effects are likely to occur</b>			<b>Evaluation of significance of potential effects, including secondary, cumulative, synergistic, permanent, temporary, positive and negative effects</b>
		<b>Short term 0-5 Yrs.</b>	<b>Medium term 5-10 Yrs.</b>	<b>Long term 10-15+ Yrs.</b>	
<b>1. Maintain and enhance biodiversity and avoid irreversible losses</b>	Policy seeks to protect and accommodate existing features, including trees, hedgerows and wildlife features that are acknowledged to be important. However, it does little for the enhancement of biodiversity through additional measures or features not considered important. Environmentally sustainable design, including water efficiency measures and sustainable drainage systems may have benefits for biodiversity.	0	? +	? +	In terms of biodiversity, significant effects are limited with regard to new development because the policy does not include incorporation of additional biodiversity features. Positive effects are likely with regards to existing features but planning should seek to improve the local environment and help to mitigate the effects of declining environmental quality. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> medium <b>Permanent or temporary:</b> uncertain
<b>2. Use land and existing buildings efficiently and prioritise development on previously developed land</b>	DS6 promotes consistent and high standards of design in developments that address environmental sustainability in their location, design, layout and materials. Also states that developments should be able to show that a site's area has been fully used. The effect should be that developments last longer, making more efficient use of land and reducing the need for demolition, with further development of Greenfield land less likely.	0	0	++	Significant long-term effects with developments built to last longer. <b>Positive or negative effect:</b> Very positive long-term <b>Potential significance of effect:</b> Medium <b>Permanent or temporary:</b> Permanent
<b>3. Promote sustainable waste management solutions</b>	Higher design standards should increase the longevity of developments, leading to a reduced need for demolition. Use of recycled building materials will help achieve this objective.	0	0	+	Positive effects likely but significance unknown. It will depend on usage of recycled materials and level of sustainable construction techniques. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> uncertain <b>Permanent or temporary:</b> uncertain
<b>4. Use and manage water resources in a sustainable manner</b>	DS6 promotes use of Sustainable Urban Drainage Systems with buildings being as water efficient as practicable.	0	+	+	Positive effects likely. Significance limited, however, as policy does not make specific requirements of developments in this area. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> low/medium <b>Permanent or temporary:</b> permanent

<b>Appendix B - OPTION 2: 'Business as usual' (continued application of existing 'saved' Policy DS6)</b>					
<b>Key to significant effects: ++ Very positive + Positive 0 Little or no effect - Negative -- Very negative ? Effects uncertain</b>					
<b>Sustainability Appraisal objective</b>	<b>Identification and description of likely significant social, environmental and economic effects</b>	<b>Time period over which effects are likely to occur</b>			<b>Evaluation of significance of potential effects, including secondary, cumulative, synergistic, permanent, temporary, positive and negative effects</b>
		<b>Short term 0-5 Yrs.</b>	<b>Medium term 5-10 Yrs.</b>	<b>Long term 10-15+ Yrs.</b>	
<b>5. Reduce the need to travel and promote more sustainable forms of transport</b>	Little or no effects likely as a result of this policy.	0	0	0	Policy has little significance for the achievement of this objective. <b>Positive or negative effect:</b> N/A <b>Potential significance of effect:</b> N/A <b>Permanent or temporary:</b> N/A
<b>6. Reduce impacts on climate change through energy efficiency measures and promotion of renewable energy solutions</b>	DS6(h) addresses environmental sustainability. In particular, orientation of buildings to maximise solar heating potential and design of units to incorporate solar panels, or to capitalise on district heating networks is promoted. This may lead to reduced impacts on the causes of climate change and increased numbers of renewable energy installations.	0	+	++	Positive effects likely in longer term but significant effects not expected in short/medium term due to lack of detail or requirement of renewable energy targets. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> medium <b>Permanent or temporary:</b> permanent
<b>7. Reduce environmental pollution</b>	Policy states that developments should be compatible with, and protect the amenity of nearby land uses in terms of visual intrusion, privacy, noise, disturbance, smell, pollution and safety. DS6 requires that any proposal does not adversely impact on existing land uses in terms of the full range of amenity impacts.	++	++	++	This policy requires that any development does not adversely impact on existing land uses. Significant positive effects if applied to all development proposals. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> High <b>Permanent or temporary:</b> permanent
<b>8. Reduce social exclusion and poverty</b>	Policy states that proposals shall demonstrate suitable access, including provision of access for disabled people, vehicle parking and service facilities. This will help improve the availability and accessibility of key local facilities, encourage active involvement of local people and maximise opportunities for all members of society.	+	++	++	Positive effects in short/medium/long term if requirements incorporated into all new developments now. Effects likely to be cumulative as new developments incorporate these standards and access between developments improves. No negative impacts are envisaged from this policy. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> high <b>Permanent or temporary:</b> permanent
<b>9. Provide decent and affordable housing for everyone</b>	High quality design is likely to lead to provision of more decent housing stock that will last longer and require less maintenance in the long term. Affordability is covered in more detail by other Local Plan policies. Energy efficiency measures may make dwellings easier to keep warm, but they could have the effect of increasing costs of construction.	0	+	++	Effects unlikely to be significant in short-term but more significance in longer term. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> high long-term <b>Permanent or temporary:</b> permanent

<b>Appendix B - OPTION 2: 'Business as usual' (continued application of existing 'saved' Policy DS6)</b>						
<b>Key to significant effects: ++ Very positive + Positive 0 Little or no effect - Negative -- Very negative ? Effects uncertain</b>						
<b>Sustainability Appraisal objective</b>	<b>Identification and description of likely significant social, environmental and economic effects</b>	<b>Time period over which effects are likely to occur</b>			<b>Evaluation of significance of potential effects, including secondary, cumulative, synergistic, permanent, temporary, positive and negative effects</b>	
		<b>Short term 0-5 Yrs.</b>	<b>Medium term 5-10 Yrs.</b>	<b>Long term 10-15+ Yrs.</b>		
<b>10. Provide a safe and healthy environment in which to live</b>	Policies require developments to be designed to minimise opportunities for criminal activity, include suitable access for disabled people and to encourage public use of developments. This can have important effects on people's sense of security and benefit health.	+	+	++	Effects likely to increase as more developments incorporate these requirements. If developments are not consistent, hotspots for crime may result. Careful consideration of design and layout can reduce the potential for crime and the fear of crime and with more people using public spaces, surveillance increases. No negative impacts are envisaged from this policy. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> High in longer term <b>Permanent or temporary:</b> permanent	
<b>11. Provide a high quality built environment</b>	Policy is strong with regards to this objective. Requires developments to show consistent and high standards of design for all types of development, whilst at least maintaining existing amenity. Potential to benefit social, environmental and economic objectives. Areas of policy particularly relevant include: <ul style="list-style-type: none"> <li>• sympathetic to local context and character</li> <li>• assessment in terms of scale, proportion, shape and mass</li> <li>• respecting existing features of biodiversity value</li> <li>• incorporating suitable landscaping</li> <li>• addressing environmental sustainability throughout</li> </ul>	+	+	++	Significant positive effects could result from this policy. Provision of a high quality built environment will have benefits across many sustainability themes, including biodiversity, economy, health, landscapes, housing, social inclusion, water and energy efficiency. An increase in quality developments is likely to improve the reputation of Swindon and of developers and lead to increased demand from all sectors. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> high in longer term <b>Permanent or temporary:</b> permanent	
<b>12. Maintain the identity and function of individual settlements</b>	DS6 promotes developments that are well laid out and sympathetic to the local context and character. This will help maintain the identity of urban districts and more rural areas. Landscaping, accommodating existing features and use of traditional materials will also help achieve this sustainability objective.	+	+	+	Policies have the potential to benefit individual settlements by ensuring that local character is taken account of. No negative impacts are envisaged from this policy. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> high <b>Permanent or temporary:</b> permanent	

<b>Appendix B - OPTION 2: 'Business as usual' (continued application of existing 'saved' Policy DS6)</b>					
<b>Key to significant effects: ++ Very positive + Positive 0 Little or no effect - Negative -- Very negative ? Effects uncertain</b>					
<b>Sustainability Appraisal objective</b>	<b>Identification and description of likely significant social, environmental and economic effects</b>	<b>Time period over which effects are likely to occur</b>			<b>Evaluation of significance of potential effects, including secondary, cumulative, synergistic, permanent, temporary, positive and negative effects</b>
		<b>Short term 0-5 Yrs.</b>	<b>Medium term 5-10 Yrs.</b>	<b>Long term 10-15+ Yrs.</b>	
<b>13. Conserve and enhance the historic built environment and archaeological assets</b>	DS6 will have many benefits for the achievement of this objective. The historic environment will benefit from developments that are sympathetic to local character, use of traditional materials and construction techniques, sensitive landscaping and accommodation of existing features.	++	++	++	No negative impacts are envisaged from this policy. The Borough contains many important areas of historical and architectural interest. Mitigation measures proposed should help protect sensitive areas in terms of adverse visual impacts. Other policies in the Local Plan relate to the historic environment. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> high <b>Permanent or temporary:</b> permanent
<b>14. Conserve and enhance rural and urban landscapes</b>	DS6 will have mainly positive impacts on this objective. However, in rural areas in particular, loss of biodiversity features may occur because the policy only stipulates accommodation of features of acknowledged importance. Many trees and hedgerows, for example, will not have any protected status, and the policy does not require incorporation of additional features.	? +-	? +-	? +-	Mixed effects. Policy is not strong enough regarding protection of biodiversity features. <b>Positive or negative effect:</b> Mixed <b>Potential significance of effect:</b> high <b>Permanent or temporary:</b> permanent
<b>15. Promote a sustainable, diverse and vibrant sub-regional economy</b>	DS6 requires developments to incorporate the principles of good urban design – developments that respect and enhance local character. This should benefit the local economy, providing places where people want to live and a Borough that businesses wish to relocate to. One concern is how the policies will affect local house prices – good design may have the effect of increasing house prices in the Borough, pricing some groups out of the market, but it may also help attract skilled, higher-income earners to the Borough.	+	+	++	Overall effects are predicted to be positive. Benefits of improved design quality for the economy likely to outweigh any adverse effects. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> high <b>Permanent or temporary:</b> permanent
<b>16. Provide opportunities for a highly skilled and educated workforce</b>	High design quality is likely to attract skilled workers to the Borough to live and work. Other Local Plan policies relate to provision of educational facilities.	+	+	++	Effects could be significant, particularly if businesses are also encouraged to relocate. No negative effects envisaged. <b>Positive or negative effect:</b> Very positive long term <b>Potential significance of effect:</b> High <b>Permanent or temporary:</b> permanent

<b>Appendix B - OPTION 2: 'Business as usual' (continued application of existing 'saved' Policy DS6)</b>						
<b>Key to significant effects: ++ Very positive + Positive 0 Little or no effect - Negative -- Very negative ? Effects uncertain</b>						
<b>Sustainability Appraisal objective</b>	<b>Identification and description of likely significant social, environmental and economic effects</b>	<b>Time period over which effects are likely to occur</b>			<b>Evaluation of significance of potential effects, including secondary, cumulative, synergistic, permanent, temporary, positive and negative effects</b>	
		<b>Short term 0-5 Yrs.</b>	<b>Medium term 5-10 Yrs.</b>	<b>Long term 10-15+ Yrs.</b>		
<b>17. Enhance the image and role of Swindon's Central Area as a sub-regional centre and destination</b>	DS6 will give particular scrutiny to proposals within the town centre. Proposals will be refused where they are prejudicial to town centre regeneration in design and amenity terms.	+	++	++	Higher design standards in the Central Area will have significant positive effects for the local economy. Swindon's Central Area is in need of much improvement and this policy should lead to many secondary and cumulative effects. <b>Positive or negative effect:</b> positive <b>Potential significance of effect:</b> High <b>Permanent or temporary:</b> permanent	
<b>Overall effect over time</b>		<b>0/+</b>	<b>+</b>	<b>++</b>		

<b>Appendix C: Sustainability Appraisal objectives internal compatibility matrix</b>		Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	Objective 9	Objective 10	Objective 11	Objective 12	Objective 13	Objective 14	Objective 15	Objective 16	Objective 17
<b>✓ Objectives considered compatible</b> <b>✗ Objectives considered incompatible</b> <b>! Potential conflict</b>																		
Biodiversity, Fauna and Flora	1. Maintain and enhance biodiversity and avoid irreversible losses.																	
Land and Water Resources	2. Use land and existing buildings efficiently and prioritise development on previously developed land.	✓																
	3. Promote sustainable waste management solutions.	✓	✓															
	4. Use and manage water resources in a sustainable manner.	✓	✓	✓														
Pollution, Air and Climatic Factors.	5. Reduce the need to travel and promote more sustainable forms of transport.	✓	✓	✓	✓													
	6. Reduce impacts on climate change through energy efficiency measures and promotion of renewable energy solutions.	!	✓	✓	✓	✓												
	7. Reduce environmental pollution.	✓	✓	✓	✓	✓	✓											
Inclusive Communities	8. Reduce social exclusion and poverty.	✓	✓	✓	✓	✓	✓	✓										
	9. Provide decent and affordable housing for everyone.	!	!	!	!	!	!	!	✓									
Healthy Communities	10. Provide a safe and healthy environment in which to live.	✓	✓	✓	✓	✓	✓	✓	✓	✓								
Development and Growth.	11. Provide a high quality built environment.	✓	✓	✓	✓	✓	✓	✓	✓	!	✓							
	12. Maintain the identity and function of individual settlements.	✓	✓	✓	✓	✓	✓	✓	✓	!	✓	✓						
Conservation and Heritage.	13. Conserve and enhance the historic built environment and archaeological assets.	✓	!	✓	✓	✓	✓	✓	✓	!	✓	✓	✓					
	14. Conserve and enhance rural and urban landscapes.	✓	✓	✓	✓	✓	!	✓	✓	!	✓	✓	✓	✓				
Economic Development and Employment.	15. Promote a sustainable, diverse and vibrant sub-regional economy.	!	!	✓	!	!	!	!	✓	✓	✓	✓	!	!	!			
	16. Provide opportunities for a highly skilled and educated workforce.	!	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	!	✓		
	17. Enhance the image and role of Swindon's Central Area as a sub-regional centre and destination.	!	✓	✓	✓	✓	✓	!	✓	✓	✓	✓	✓	!	✓	✓	✓	

