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## Report for

Vashti Gooding  
Principal Planning Officer  
Basingstoke and Deane Borough Council  
Civic Offices  
London Road  
Basingstoke

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## Main contributors

Sean Nicholson  
Robert Deanwood  
Andrew Williamson

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## Issued by

.....  
Sean Nicholson

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## Approved by

.....  
Pete Davis

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## Wood Group UK Limited

Nicholls House  
Homer Close  
Leamington Spa  
Warwickshire CV34 6TT  
United Kingdom  
Tel +44 (0)1926 439 000

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## Document revisions

No.	Details	Date
1	Draft for client	Feb 2022
2	Final	Feb 2022







<b>Environmental</b>	
Objective 4: Reduce pollution (including minimising emissions of greenhouse gases to achieve zero net carbon) and support mitigation and adaptation measures required for the impact of climate change	Air, Human Health, Climatic Factors, Soil, Water.
Objective 5: Minimise and improve the efficiency of resource use	Soil, Water, Material Assets, Climatic Factors.
Objective 6: Conserve and enhance biodiversity, including connectivity	Biodiversity, Flora and Fauna, Soil, Water, Air.
Objective 7: Maintain and improve water quality, and ensure the sustainable management of water resources	Biodiversity, Flora and Fauna, Water.
Objective 8: Reduce the risk of flooding and the resulting detriment to the local community, environment and economy	Human Health, Water, Climatic Factors, Material Assets.
Objective 9: Protect, and where possible enhance, the character and quality of the local landscape and geodiversity	Landscape, Biodiversity, Flora and Fauna.
Objective 10: Protect, and where possible enhance, heritage assets	Cultural Heritage, Climatic Factors.
Objective 11: Conserve and enhance the character of the borough's settlements through high quality design that maintains and strengthens local distinctiveness	Cultural Heritage, Climatic Factors, Landscape.
<b>Economic</b>	
Objective 12: Ensure sustainable economic growth, supporting the diverse economy of the borough and enabling opportunities for new sectors, in order to maintain high levels of employment	Population, Human Health, Climatic Factors.
Objective 13: Facilitate access to high quality education facilities in order to improve educational attainment and increase opportunities for new skills and learning that meet the needs of the local workforce	Population.
Objective 14: Ensure access to services and facilities in order to sustain the vibrancy of communities and enhance the attractiveness of town centres to visitors	Population, Human Health, Climatic Factors, Material Assets

The policies currently being considered by the Council (and reasonable alternatives) have been appraised using matrices to identify likely significant effects on the SA objectives. A qualitative scoring system has been adopted which is set out in **Table NTS 2**.







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### Appendices found in separate volume

Appendix A	Quality Assurance Checklist
Appendix B	Responses to Scoping Report
Appendix C	Revised Scoping Report
Appendix D	Review of Plans and Programmes
Appendix E	Policy options considered
Appendix F	Preferred policy approach
Appendix G	Assessment of Options
Appendix H	Appraisal of Draft Local Plan Policies

















treatment of reasonable alternatives within the SA, the presentation of reasons for selection and rejection of reasonable alternatives and the need to maintain an audit trail of decisions.

- 1.5.5 There is a requirement to consult on the scope of the SEA with statutory consultees (Historic England, Natural England and the Environment Agency). The Council prepared a Scoping Report to inform the assessment that accompanied the Issues and Options document and consulted on that between Monday 28 September 2020 to Monday 9 November 2020. This included the contextual information used to inform the scope of the IIA, along with a draft SA Framework to be used to complete the assessment. The information presented in this report has been updated by the Council to reflect the responses received on the draft Scoping Report (summarised in **Appendix B**).

### Health Impact Assessment

- 1.5.6 There is no statutory requirement for HIA. Undertaking HIA helps ensure that health and wellbeing are being properly considered in planning policies and proposals. The process looks at the positive and negative health and wellbeing impacts of development as well as assessing the indirect implications for the wider community. Within the context of the Local Plan, the aim is to assess the main health and wellbeing impacts of policies and proposals in order to identify any opportunities for the emerging planning policies to maximise the benefits and avoid any potential adverse impacts. The NHS London Healthy Urban Development Unit (HUDU) has developed a Rapid Health Impact Assessment Tool (October 2019). The approach to HIA is discussed in **Section 2.7** of this report.

### Equalities Impact Assessment (EqIA)

- 1.1.1 An EqIA is a tool to assist the Council in complying with requirements under the UK Equality Act 2010 and Public Sector Equality Duty, which require public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. EqIA serves as a mechanism for ensuring that 'due regard' is given to minority groups in decision-making and the activities of the Council. This includes policies, procedures, projects and proposals. Legislation identifies nine protected characteristics and the EqIA considers the potential for effects on these.
- 1.1.2 The protected characteristics are:
- Gender;
  - Race;
  - Disability;
  - Sexual orientation;
  - Religion/belief;
  - Marriage and Civil Partnership;
  - Age;





- **Section 1:** Introduction - Includes a summary of the current LPU document, and an overview of the Report contents;
- **Section 2:** sets out the approach to the IIA, reviewing key information from the scoping stage and then details the approach that will be taken to the different elements of the IIA;
- **Section 3:** presents the results of the assessment of the policies that are being considered by the Council and comments on the consideration of options;
- **Section 4:** sets out conclusions and next steps; and
- A separate volume of **appendices** contains more detailed information for the different elements of the IIA, including baseline information, relevant plans and programmes, detailed matrices etc.



## Evolution of the Baseline

2.3.2 Sections 3 to 11 of the Scoping Report considered key baseline data, including evolution of the baseline in the absence of the LPU, throughout and at the end of each chapter. Section 13.3 of the Scoping Report provides a summary of the likely future changes and is reproduced below.

- International awareness of Climate Change and its impacts has increased. Locally, the Council's declaration of a Climate Change Emergency needs to be endorsed through relevant plans and programmes, including the Local Plan Update, to help tackle climate change and embed ambitious sustainability principles to ensure that the Council's target for carbon neutrality is met. The location and design of new development plays a long term role in minimising carbon emissions. Potential consequences of Climate change include loss of biodiversity and increased flooding.
- Due to changing housing needs and national requirements there is potentially a need to increase the supply of housing within the time period of the adopted Local Plan in addition to beyond it. In the absence of this, certain policies within the current Adopted Local Plan that direct the location of new development will become out-of-date and housing development will not be plan led. Specific housing needs will not be met without planning policies to provide for them. For example, in the absence of provision for gypsies and travellers there may be an increased number of unauthorised encampments, and a shortage of affordable housing may result in increased homeless.
- Potential for further instances of poor quality accommodation and places in the absence of higher quality design policies reflecting national guidance. Opportunities to improve place making, create local communities and improve design distinctiveness would be lost.
- Changes in the demographics of the population such as an ageing population, will have implications for the local economy, housing and health infrastructure, and on the viability of local services. Changing needs may not be met.
- A growing population increases demand for leisure, cultural, health, community, sports and education facilities which need to be protected and secured through planning policies.
- Additional development is anticipated to result in the increased use of resources such as land, water, energy - the extent to which this is moderated by any improved efficiencies in existing and new development and infrastructure is not certain but updated planning policies can reduce impact.
- Whilst many environmental and heritage designations are protected by other legislation, local planning policies need to set out how development can be sustainably accommodated whilst protecting these assets, which may require strategic mitigation. Revisions to national legislation also need to be reflected at a local level, such as securing net gains in biodiversity, protecting local environmental assets including open spaces, and greening urban areas . Updated planning policies are also required to minimise flooding (taking into account a worsening situation with climate change) and protect water quality (as required by the Water Framework Directive obligations), whilst also enabling new development to be built.





### Sustainability Issue

- Whilst there are high levels of safety satisfaction in the borough, there are specific areas of crime, including anti social behaviour, to be addressed.
- The need to enable the delivery of suitable regeneration opportunities to be taken forward through the Place Shaping Framework.
- Increasing recognition of the contribution of the design of new developments in creating sustainable, healthy, safe and inclusive communities.

### Environment

#### Natural Environment

- The natural environment is a key asset of the borough.
- A significant proportion of the borough is countryside, with distinctive and high quality landscape character areas including the North Wessex Downs AONB. Potential impact of new development on the distinctive landscape areas.
- The borough supports a wealth of biodiversity, including designated and non-designated features. There are over 850 protected or notable species.
- Ensuring the retention, management and creation of robust habitats that will be able to cope/adjust to the impacts of climate change will be a challenge to be addressed.
- Pressure on greenfield land (and potentially agricultural land) from new development given the relative shortage of available previously developed land for redevelopment.
- The River Test and River Loddon are high quality chalk rivers, therefore requiring special protection for both water quality and ecology, alongside other water bodies that should be protected for water quality and biodiversity.
- Although only a small percentage of the land area is within floodplain, parts of the borough are vulnerable to groundwater, surface water and sewer flooding.
- The borough is within a region that is 'water stressed' and therefore water efficiency measures are required.
- There are internationally designated wildlife sites outside of the borough that need to be protected from the impacts of new development within the borough, including those in the Solent and Thames Basin Heaths.
- The air quality of the borough is generally good and should be maintained and improved where possible, particularly in certain high density traffic locations in the borough.
- Trees and hedgerows, including Ancient Woodland, are extensive in the borough and are a valued asset due to their varied benefits including carbon lock up, supporting biodiversity and greening urban areas.
- The borough has a good range of green infrastructure assets including open spaces. Issues to be addressed include: differing priorities of wildlife and people; impact of new development and biodiversity loss; accessibility and poor linkages.

## Sustainability Issue

**Sustainability (whilst the title of this theme would cover economic, environmental, and social issues, for the purpose of H2050 on which it is based) it primarily refers to climate change hence it is in the 'environment' section)**

- Climate change will result in higher temperatures, less precipitation in the summer, and more in the winter. This is likely to have a range of impacts on the natural and built environment, with implications for human health. Water resources and flooding may be particularly affected across the borough. The main contributors to carbon emissions in the borough are transport, followed by homes, and industrial uses. The Council has set an ambitious target for the borough to be carbon neutral by 2030.
- Additional development and a rising population is likely to increase the use of resources such as land, materials, water, as well as generating increased waste and pollution.
- The main source of renewable energy in the borough is from photovoltaics. There is the potential for further renewable energy resources to be utilised across the borough.
- The amount of waste per household/population is decreasing, as is the amount being recycled, and a very small percentage of Hampshire's waste goes to landfill. A significant proportion is used for energy recovery.

## Heritage and Distinction

- The borough contains a range of high quality heritage assets that should be protected or enhanced. This includes 1,608 listed buildings, more than 40 Conservation Areas, 96 Scheduled Monuments and 7 landscapes on the Register of Historic Parks and Gardens.
- The potential impact of new development on the borough's built assets and the need to protect the local character and distinctiveness of the borough's settlements.

## Economic

### Transport

- The borough shows a good level of 'self-containment', with a similar number of in-commuters and out-commuters. However, there is high reliance on private transport.
- Sustainable Transport, including public transport, walking and cycling is being encouraged through various legislation and strategies in order to reduce greenhouse gases, reduce pollution levels and maintain/improve air quality. Ambitions include a Mass Rapid Transport system for Basingstoke Town.
- Improvements to the road network, as well as step changes in transport provision and travel behaviour will be required to avoid increasing congestion, longer journey times, poor network reliability, and associated negative environmental, safety and social impacts. This is likely to include significant changes to the strategic network (M3 and A33) to accommodate further growth in Basingstoke.
- New developments should be located and designed to minimise the need to travel, promote sustainable transport modes, and improve accessibility.
- Access to facilities and services is a key issue, particularly for those living outside of Basingstoke Town.

**Sustainability Issue****Education**

- School capacity is an issue with some primary schools at capacity, and some secondary schools with spare capacity, particularly where performance is low. There is some spatial disparity in the capacity/standard of schools across the borough.
- There is a programme of school expansion and new facilities across the borough, particularly associated with new development, albeit this remains under review associated with pupil numbers.
- Educational attainment, particularly at secondary school level, could be improved.
- Whilst the town has two high quality further education colleges in Basingstoke Town, there is an identified need for further higher university-level education provision that links students and skills with local employers.

**Economy and Entrepreneurship**

- The diversity of jobs across all sectors is a great strength for the borough's economy and local labour market.
- There is low unemployment and wages are relatively good.
- Many of Basingstoke's older employment areas are of poor quality and lack Grade A office space. Weak demand for office space has been identified in the latest Economic Needs Assessment (although there has been subsequent uptake of office space in some areas) but a relatively strong industrial market. There is strong demand for further supply and distribution premises but a constrained supply of suitable sites.
- Basing View, an identified Enterprise Zone, is undergoing regeneration to create investment opportunities and further jobs.
- The recent conversions of offices to dwellings as Permitted Development has resulted in a significant loss of employment floorspace and issues with the quality of dwellings provided, lack of affordable housing and infrastructure provision.
- The rural economy is important to the borough and the sustainability of rural areas. Challenges include restructuring of agriculture, lack of appropriate premises, and variable communications infrastructure such as broadband.
- The borough's shopping centres are facing major challenges as a result of changes in how people shop and spend their leisure time.
- Basingstoke Town has generally been performing well but has seen an increase in vacant properties more recently and a reduction in footfall in some parts.
- It will be necessary to ensure that no adverse impacts result from the regeneration of the Leisure Park, and that designated centres maintain their vitality and attractiveness.
- The retention and improvement of services and facilities is a key issue, particularly for residents outside of Basingstoke Town



<b>Objective</b>	
	Climatic Factors.
Objective 6: Conserve and enhance biodiversity, including connectivity	Biodiversity, Flora and Fauna, Soil, Water, Air.
Objective 7: Maintain and improve water quality, and ensure the sustainable management of water resources	Biodiversity, Flora and Fauna, Water.
Objective 8: Reduce the risk of flooding and the resulting detriment to the local community, environment and economy	Human Health, Water, Climatic Factors, Material Assets.
Objective 9: Protect, and where possible enhance, the character and quality of the local landscape and geodiversity	Landscape, Biodiversity, Flora and Fauna.
Objective 10: Protect, and where possible enhance, heritage assets	Cultural Heritage, Climatic Factors.
Objective 11: Conserve and enhance the character of the borough's settlements through high quality design that maintains and strengthens local distinctiveness	Cultural Heritage, Climatic Factors, Landscape.
<b>Economic</b>	
Objective 12: Ensure sustainable economic growth, supporting the diverse economy of the borough and enabling opportunities for new sectors, in order to maintain high levels of employment	Population, Human Health, Climatic Factors.
Objective 13: Facilitate access to high quality education facilities in order to improve educational attainment and increase opportunities for new skills and learning that meet the needs of the local workforce	Population.
Objective 14: Ensure access to services and facilities in order to sustain the vibrancy of communities and enhance the attractiveness of town centres to visitors	Population, Human Health, Climatic Factors, Material Assets



- **R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378** in which the requirements for reasonable alternatives were reviewed as part of ways to manage the demand for second homes in St Ives:
  - ▶ Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.
  - ▶ An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.
  - ▶ The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”

2.6.4 At this stage of the assessment the focus of the assessment is on the policies that the Council is currently considering.

2.6.5 To date the policy review process undertaken by the Council has included the following:

- An assessment of how a current policy in the ALP is working against the targets set out in the ALP and Authority Monitoring Report (AMR), alongside wider Plan objectives;
- A consideration of the extent to which a policy is compliant with national level planning guidance (which, in some cases, has been updated since the adoption of the Local Plan);
- A consideration of whether a policy reflects current and developing local strategies and priorities;
- An assessment of whether current policy is in line with the developing evidence base;
- A consideration of advice provided by stakeholders and partners; and
- Draft policies have also been discussed with or provided to councillors who make up the Local Plan Members Advisory Panel (MAP).

2.6.6 The policy review process included the consideration of alternative approaches for policies in specific topics. The Council also consulted on Issues and Options in 2020. The options identified by the Council are outlined in **Appendix E** of this Report. **Appendix F** includes an outline of the reasons why the preferred approach was selected and other options not pursued. It is important to note that the Council considered a range of influencing factors to inform the LPU, e.g. is the policy needed or do alternative approaches need to be considered? The resulting options do not necessarily constitute reasonable alternatives for the purpose of the SEA regulations – they were used to ensure that the LPU was informed by a thorough review and critique of the ALP. **Appendix F** summarises the considerations and whether or not options constituted a reasonable alternative for the purposes of the assessment. **Appendix G** includes an assessment of those options that were considered to be reasonable alternatives for the purposes of this assessment. This







*significant effect on a European site<sup>1</sup> or a European offshore marine site<sup>2</sup> (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site” then the plan-making authority must “...make an appropriate assessment of the implications for the site in view of that site’s conservation objectives” before the plan is given effect. The process by which Regulation 105 is met is known as Habitats Regulations Assessment (HRA)<sup>3</sup>. An HRA determines whether there will be any ‘likely significant effects’ (LSE) on any European site as a result of a plan’s implementation (either on its own or ‘in combination’ with other plans or projects) and, if so, whether these effects will result in any adverse effects on the site’s integrity. The Council has a statutory duty to prepare the Local Plan and is therefore the competent authority for the HRA.*

- 2.9.2 Regulation 105 essentially provides a test that the final plan must pass; there is no statutory requirement for HRA to be undertaken on draft plans or similar developmental stages (e.g. issues and options; preferred options) and so the report does not provide a formal conclusion to the HRA process. However, it is accepted best-practice for the HRA of strategic planning documents to be run as an iterative process alongside the plan development, and so at the Draft Plan stage potential mechanisms by which the Local Plan could affect European sites are identified and (if necessary) measures suggested to ensure significant effects do not occur.
- 2.9.3 The HRA of the LPU will use the principles of ‘screening’ to allow the assessment stage to focus on those aspects that are most likely to have potentially significant or adverse effects on European sites, as well as shape the emerging plan. Screening is therefore used to ‘screen-out’ European sites and plan components from further assessment, if it is possible to determine that significant effects are unlikely (e.g. if sites or interest features are clearly not vulnerable (both exposed and sensitive) to the outcomes of a plan due to the absence of any reasonable impact pathways). For the LPU, the screening process will be used on the plan ‘as a whole’; on the European sites themselves; and on the key components of the plan (the policies and allocations). The screening takes account of measures that are intended for inclusion in the plan to avoid significant effects.
- 2.9.4 The current European Commission (EC) [guidance](#) suggests a four-stage process for HRA as shown in **Box 1**, although not all stages may be necessary.

<sup>1</sup> Strictly, ‘European sites’ are: any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a ‘Site of Community Importance’ (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the ‘new wild birds directive’) apply; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Habitats Regulations are applied a matter of UK Government policy when considering development proposals that may affect them. “European site” is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

<sup>2</sup> ‘European offshore marine sites’ are defined by Regulation 15 of The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended); these regulations cover waters over 12 nautical miles from the coast.

<sup>3</sup> The term ‘Appropriate Assessment’ has been historically used to describe the process of assessment; however, the process is now more usually termed ‘Habitats Regulations Assessment’ (HRA), with the term ‘Appropriate Assessment’ limited to the specific stage within the process; see also Box 1.

## Box 1 – Stages of Habitats Regulations Assessment

### Stage 1 – Screening

This stage identifies the likely impacts upon a European site of a project or plan, either alone or 'in combination' with other projects or plans, and considers whether these impacts are likely to be significant.

### Stage 2 – Appropriate Assessment

Where there are likely significant effects, or effects are uncertain, then 'appropriate assessment' is required. This stage considers the impacts of the plan or project on the integrity of the relevant European sites, either alone or 'in combination' with other projects or plans, and with respect to the sites' structure and function and their conservation objectives. Where there are adverse impacts, it also includes an assessment of the potential mitigation for those impacts.

### Stage 3 – Assessment of Alternative Solutions

Where adverse impacts are predicted, this stage examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of European sites.

### Stage 4 – Assessment Where No Alternative Solutions Exist and Where Adverse Impacts Remain

This stage assesses compensatory measures where it is deemed that the project or plan should proceed for imperative reasons of overriding public interest (IROPI). The EC guidance does not deal with the assessment of IROPI.

- 2.9.5 Potential effects on all European sites within 15km of the Borough's boundary will be considered, together with any additional sites that may be hydrologically linked to the plan's zone of influence. This is considered to be a suitably precautionary starting point for the assessment of the LPU. Often, however, sites or interest features within a study area can be excluded from further assessment at an early stage ('screened out') because the plan or project will self-evidently have either 'no effect' or 'no significant effect' on these sites (i.e. the interest features are not sensitive to likely effects of plan or project; or are not likely to be exposed to those effects due to the absence of any reasonable impact pathways).
- 2.9.6 The proposed approach will identify the current factors affecting sites and their conservation objectives and to then to screen the policies in the LPU to see if they would contribute to any existing problems. The HRA will be a free standing report with the results summarised in later versions of this IIA Report.
- 2.9.7 Natural England will be consulted on the European sites to be considered and other aspects of the HRA.



strategic in nature, making it difficult to necessarily differentiate between options. This is a common issue with work of this nature and not unique to the LPU.

- 2.10.9 Later iterations of this report will provide additional information about any difficulties associated with the assessment.



carbon neutral. Significant positive effects are identified in relation to the following SA objectives: SA3 'Travel,' SA4 'Pollution,' SA5 'Resources,' SA7 'Water Resources' and SA12 'Economy.'

- 3.3.3 Policy CC1 is assessed on the basis that the additional costs associated with minimising greenhouse gas emissions will not impact on the delivery of new housing (SA1 'Housing') because the Local Plan will be subjected to viability testing prior to submission/adoption.
- 3.3.4 Policy CC1 also seeks to mitigate against anticipated climate change by directing development away from areas at risk of flooding and securing green infrastructure. Significant positive effects are identified in relation to the following SA objectives on this basis: SA2 'Health,' SA6 'Biodiversity' and SA8 'Flood Risk.'
- 3.3.5 Policy SS2 seeks to encourage regeneration within the Borough which will help address areas of poor-quality housing and provide quality designed new homes in an enhanced environmental setting. Significant positive effects are therefore considered likely for SA1 'Housing,' SA2 'Healthy communities' and SA5 'Resources.'
- 3.3.6 Policy SS2 supports regeneration which requires, amongst other things, the provision of high-quality design standards. This has the potential to significantly enhance settlement character and address existing poorly designed areas. Overall, likely significant positive effects are assessed for each of these policies in relation to SA11 'Settlement character'.
- 3.3.7 Policy SS8 supports regeneration of Basing View with delivery of a mix of uses including medical facilities and residential development (approximately 300 dwellings). Significant positive effects are therefore considered likely for SA1 'Housing' and SA2 'Healthy communities'. Policy SS8 seeks the efficient and effective use of under-used/vacant land through the regeneration with a likely significant effect identified for SA5 'Resources'. Additionally, the policy supports high-quality employment development as a strategic site. A likely significant positive effect for SA12 'Economy' is assessed.
- 3.3.8 Policy SS10 supports a new railway station that will increase transport choice and connectivity and significant positive effects are identified in relation to SA3 'Transport,' SA5 'Resources' and SA12 'Economy.'
- 3.3.9 Given the contribution that the policies make to supporting the regeneration of the Borough, promotion of healthy communities and supporting the vitality and vibrancy of Basingstoke town centre, there is potential for significant positive cumulative effects in relation to SA2 'Healthy communities,' SA12 'Economy' and SA14 'Services and facilities'.

### Suggested Mitigation/Enhancement

- 3.3.10 The evidence base for the Local Plan notes that there are many areas that are potentially suitable for renewable energy in the district (based on high level opportunities mapping) and that there is potential for the identification of suitable areas to create an unduly favourable policy framework for proposals that may have localised impacts.
- 3.3.11 Policy CC1 as currently worded seeks to maximise opportunities for renewable and low carbon energy generation in the borough. It is suggested that the term 'optimise' is used instead of 'maximise.' As worded the policy could result in negative impacts on landscape and geodiversity (SA9), heritage (SA10) and settlement character (SA11) at the local level.







context and the need to secure mitigation, including the provision of Suitable Alternative Natural Green Space as an alternative recreational area to the Thames Basin Heaths Special Protection Area. Together, the network of biodiversity sites forms the basis for future expansion and connection, in turn contributing to the character and quality of life in the Borough, and efforts to address climate change through specific strategies and action plans (climate change and air quality). The need for action is recognised in the borough's Ecological Emergency Strategy and Action Plan, for example. A significant positive, but uncertain cumulative effect is identified, reflecting the long-term outcomes of policy implementation.

### Suggested Mitigation/Enhancement

- 3.5.11 No significant negative effects are identified and therefore no mitigation is suggested. A detailed observation on EM4 is that it may need a statement/criteria to provide a clear link between the first part of the policy, which relates to avoidance of significant harm and the second part, which is focussed on biodiversity net gain. Clearly the argument could be made that the policy should be read as a whole but part (1) of the policy could be amended to emphasise that the objective of achieving net gain applies in all instances, including those where mitigation is required to avoid significant harm.

### Green Infrastructure

- 3.5.12 The policies assessed are:
- EM2 - Strategic Gaps;
  - EM5 - Green Infrastructure; and
  - NP7 - Local Green Spaces.
- 3.5.13 Policy EM2 is assessed as having a significant positive effect on SA 11 'Settlement Character'.
- 3.5.14 Policies EM5 and NP7 are assessed as having a significant positive effect on SA 1 'Housing', SA2 'Healthy Communities,' and SA6 'Biodiversity.'
- 3.5.15 The provision of GI and greenspaces as part of new housing development will help to create more sustainable communities, through health improvement, recreational opportunities and community identity. Local greenspace provision and designation will be an important part of fulfilling the aspirations of the borough's GI Strategy. A significant positive cumulative effect is identified.
- 3.5.16 No significant negative effects are identified and therefore no mitigation is suggested.

### Water Quality and Water Management

- 3.5.17 The policies assessed are:
- EM6 - Water Quality;
  - EM7 - Flood Risk; and

- EM12 - Pollution & Air Quality.

- 3.5.18 Policy EM6 is assessed as having a significant positive effect on SA6 'Conserve Biodiversity' and SA7 'Water Resources.'
- 3.5.19 Policy EM7 is assessed as having a significant positive effect on SA8 'Flooding.'
- 3.5.20 Policy EM12 is assessed as having a significant positive effect on SA6 'Biodiversity.'
- 3.5.21 No significant negative effects are identified and therefore no mitigation is suggested.

## Mitigating and Adapting to Climate Change

### Consideration of Reasonable Alternatives

- 3.5.22 The Council considered three options for energy standards for new development which are considered reasonable alternatives for the purposes of this assessment:
- Option 1: Require all new residential development to reach net zero carbon.
  - Option 2: Require an uplift in energy efficiency standards for new homes to approximately 20% above the Building Regulations.
  - Option 3: Continue with the current approach and require new development to meet the Building Regulations or future equivalent.
- 3.5.23 Option 1 and 2 are assessed on the basis that they would make a significant contribution to helping to tackle fuel poverty for future residents and a significant positive effect in relation to SA2 'Healthy communities' is identified. Options 1 and 2 seek to reduce energy use associated with new developments and encourage improvements to existing buildings, a significant positive contribution is identified in relation to SA5 'Resource use.' Option 1 encourages the use of sustainable design and construction measures which could contribute to growth in the energy sector locally. A significant positive effect is identified in relation to SA12 'Economy.' Options 2 and 3 do this to a lesser degree.
- 3.5.24 Option 1 is preferred by the Council. The other approaches would miss an opportunity to deliver buildings of the highest performance standard and would not support, and could possibly hinder, the Council in meeting its Climate Emergency declaration.
- 3.5.25 The Council considered the following options in relation to the provision of renewable energy and low carbon energy generation:
- Option 1: Identify suitable areas for renewable and low carbon energy sources and their supporting infrastructure in the LPU.
  - Option 2: Encourage the allocation of specific renewable and low carbon energy sources or infrastructure through neighbourhood plans and support community-led schemes.
- 3.5.26 There is uncertainty in relation to Option 1 and how potential impacts on biodiversity (SA6), SA9 (landscape), heritage (SA10) and settlement character (SA11) at the local level would be factored into the identification of suitable areas. The identification of sites at the community level suggests there is potential for a more sensitive approach in relation to

these objectives but this would depend on the approach taken and how sensitive the local environment was.

- 3.5.27 Option 2 is the Council's preferred approach because of concerns about the feasibility of identifying suitable areas in the Local Plan and the potential for the high-level identification of suitable areas to create an unduly favourable policy framework for proposals that may have localised negative effects. The Council have proposed to include a positively-worded criteria-based policy that recognises the contribution of renewable energy to reaching net zero carbon that includes criteria against which to assess specific proposals. These could be used by neighbourhood planning groups as a starting point for more detailed work to identify suitable areas for solar or wind development in their parishes.

### Assessment of Policies

- 3.5.28 Policy CC1 - A Carbon Neutral, Climate Adapted Borough is considered above and provides the overarching policy for intervention in relation to climate change. Policies NP8-10 provide more detail in relation to mitigation and adaptation.
- 3.5.29 The policies assessed are:
- NP8 - Energy Requirements;
  - NP9 - Sustainable Design, Construction and Adaptation; and
  - NP10 - Renewable and Low Carbon Energy Generation.
- 3.5.30 Policy NP9 encourages certification against the Home Quality Mark, which could improve the standard of new residential developments and a significant positive effect in relation to SA1 'Housing' is identified.
- 3.5.31 Policy NP8 could help tackle fuel poverty. Policy NP9 also encourages site and building adaptation measures to provide for the comfort, health, and wellbeing of occupiers (associated with vulnerability to overheating and cooling) and significant positive effects in relation to SA2 'Healthy Communities' are identified.
- 3.5.32 Policy NP10 includes a criterion to ensure that proposals for the generation of energy from renewable and low carbon resources (excluding wind turbines) do not contribute to pollution and a significant positive effect is identified in relation to SA4 'Pollution.'
- 3.5.33 Policy NP8 seeks to reduce energy use associated with new developments and encourage improvements to existing buildings, a significant positive contribution is identified in relation to SA5 'Resources.' Policy NP9 seeks to reduce waste associated with the construction and operational phases of development and a significant positive effect is identified in relation to SA5 'Resources.'
- 3.5.34 Policy NP9 includes requirements in relation to water efficiency for new developments and a significant positive effect is identified in relation to SA7 'Water Resources.'
- 3.5.35 Policy NP8 enables appropriate proposals for energy efficiency measures for historic buildings and a significant positive effect is identified in relation to SA10 'Heritage.'

- 3.5.36 Policy NP10 includes a range of criteria relating to the provision of renewable and low carbon energy proposals and significant positive effects are identified across a range of SA objectives, including SA6 'Biodiversity,' SA9 'Landscape & Geodiversity' and SA10 'Heritage.'
- 3.5.37 Policies NP8, NP9 and NP10 encourage the use of sustainable design and construction measures which could contribute to growth in the energy sector locally. Policy NP9 recognises the difficulties associated with non-residential buildings achieving reduced energy use and adopts an approach based on the achievement of BREEAM standards. This approach will help ensure that the provision of new non-residential development is not hindered while still ensuring that such buildings contribute to the plans' objectives. Significant positive effects are identified in relation to SA12 'Economy' on this basis.
- 3.5.38 Taken together policies NP8 and NP9 could have a significant positive cumulative effect in relation to SA5 'Resources.'
- 3.5.39 A significant positive cumulative effect is identified in relation to policies NP8, NP9 and NP10 in relation to objective SA12 'Economy.'

### Suggested Mitigation/Enhancement

- 3.5.40 The suggestions below are made in relation to Policy NP8 and constitute suggestions for enhancement, rather than mitigation.
- 3.5.41 It is suggested that consideration is given to data enabling measures to capture actual energy use in new developments. New build and major retrofit schemes should have the capacity to transmit metered supply data; that way real life operational emissions can be determined and hence accurate offset needs (rather than high level estimates and/or prescribed levels). There are already forms of legal agreement drawn up that facilitate individual meter data being shared anonymously to enable use of real data in Greenhouse Gas (GHG) emission calculations.
- 3.5.42 It is suggested that care is taken in assessing costs to developers associated with the proposed policy. This ensures a positive engagement route with developers, rather than challenges regarding proposed costs, or lack of interest in development given the opportunity to develop in different regional areas (elsewhere in the UK) at lower cost.
- 3.5.43 It is suggested that the Council demonstrates that it has explored other options to a local offset fund including considering the costs and benefits of the different approaches.

### Design

- 3.5.44 The policies assessed are:
- NP11 Overarching Design Principles;
  - NP12 Site Design;
  - NP13 Building Design;
  - NP14 Internal Space Standards; and
  - NP15 Minimum Density & Intensification.

- 3.5.45 Policies NP11 and NP12 are assessed as having a significant positive effect on SA1 'Housing', SA2 'Healthy Communities', SA6 'Biodiversity', SA7 'Water Resources,' SA8 'Flooding' and SA14 'Services and Facilities'.
- 3.5.46 Policy NP13 is assessed as having a significant positive effect on SA 1 'Housing' and SA7 'Water Resources.'
- 3.5.47 Policy NP14 is assessed as having a significant positive effect on SA1 'Housing.'
- 3.5.48 Policy NP15 is assessed as having a significant positive effect on SA1 'Housing' and SA2 'Healthy Communities.'
- 3.5.49 Comprehensively implemented, policies NP11, NP12, NP13, NP14 and NP15 have the potential to deliver the aspiration for housing which better meets the needs of the Borough's existing and future population. The policies help to deliver national policy relating to local character and design quality and ultimately creation of sense of place as well as distinctive and attractive residential environments. Significant positive cumulative effects are identified in relation to SA1 'Housing' and to SA2 'Healthy Communities.'
- 3.5.50 Policies NP11 & NP12 should, in combination with other plan policies, help to secure biodiversity and GI provision as part of new development. A significant positive, but uncertain cumulative effect is identified in relation to SA6 'Biodiversity,' reflecting the long-term outcomes of policy implementation.
- 3.5.51 Through site and building design, policies NP11, NP12 and NP13 there is the opportunity to ensure that water resource management is a significant element of new development. A significant positive cumulative effect is identified in relation to SA7 'Water resources.'
- 3.5.52 General and site design policies NP11 and NP12 should ensure sustainable design in respect of flood risk management. A significant positive, but uncertain cumulative effect is identified in relation to SA8 'Flooding,' reflecting the long-term outcomes of policy implementation.
- 3.5.53 Design standards through policies NP11 and NP12 will be important in ensuring sustainable communities. A significant positive, but uncertain cumulative effect is identified, reflecting the long-term outcomes of policy implementation. A significant positive, but uncertain cumulative effect is identified in relation to SA14 'Services and Facilities.'

### Suggested Mitigation/Enhancement

- 3.5.54 No significant negative effects are identified and therefore no mitigation is suggested.

## 3.6 Supporting the Economy

- 3.6.1 The policies assessed are:
- EP1 - Economic growth and Investment;
  - EP2 - Employment land and Premises;
  - EP3 - Town, District and Local Centres;

- EP4 - Rural Economy; and
- EP5 - Rural Tourism.

- 3.6.2 Policy EP1 could contribute to objective SA2 'Healthy Communities' by encouraging the regeneration of sites for employment and a significant positive effect is identified. Policy EP3 seeks to protect existing centres and allows for the creation of new local and district centres (where suitable) and a significant positive effect in relation to this objective is identified.
- 3.6.3 Policy EP1 protects existing strategic employment sites and encouraging the regeneration of existing sites could also help reduce the need to travel for employment. The policy also requires that proposals can be reasonably accessed via sustainable travel options. A significant positive effect is identified in relation to objective SA3 'Travel.' Policy EP3 seeks to protect existing centres and allows for the creation of new local and district centres (where suitable). A significant positive effect is identified.
- 3.6.4 Policy EP1 encourages the reuse of previously developed land and buildings and a significant positive effect in relation to objective SA5 'Resources' is identified.
- 3.6.5 Policy EP1 and EP5 include a criterion relating to mitigation of landscape impacts and a significant positive effect is identified in relation to objective SA9 'Landscape & Geodiversity.'
- 3.6.6 Policy EP1 seeks to maintain the balance of housing and jobs, and sustain employment opportunities, as well as maintaining productivity within the borough and ensuring it remains attractive to new investment and a significant positive effect is identified in relation to objective SA12 'Economy.' Policy EP2 seeks to protect existing employment areas and will also make a significant positive contribution to this objective.
- 3.6.7 Policy EP1 seeks to encourage key employment sectors that could provide the stimulus for education and training and a significant positive effect is identified in relation to SA13 'Education.'
- 3.6.8 Policy EP3 seeks to protect existing centres and allows for the creation of new local and district centres (where suitable). A significant positive effect is identified in relation to SA objective 14 'Services and facilities.'
- 3.6.9 Taken together, the employment policies could have a cumulative significant positive effect in relation to objective SA2 'Healthy Communities' and objective SA3 'Travel.'

### Suggested Mitigation/Enhancement

- 3.6.10 Policies EP2 and EP4 include the need to demonstrate that a site that was previously in employment use has been actively marketed prior to the submission of an application for alternative use. It is suggested that this is amended to marketed for employment uses for a continuous period of at least 12 months.
- 3.6.11 Policy EP5 on rural tourism could include a criteria directing development to areas with transport choice to reduce reliance on the car or require proposals to demonstrate how this could be provided.

### 3.7 Cumulative, Synergistic and Secondary Effects of Policies and Sites

- 3.7.1 The matrices for each topic at **Appendix H** identify those instances where potential cumulative effects are anticipated, including synergistic effects. Potential cumulative effects have been identified through professional judgement having regard to the overall performance of policies and how they might interact against specific IIA objectives. This is a preliminary analysis at this stage, which will be updated as additional policies are consulted on, which will include consideration of how policies under different topic areas interact, for example a number of policies will contribute to the protection of water quality (including NP5, NP6 and EM6) and could have a significant positive cumulative effect in relation to SA7 'Water Resources'.
- 3.7.2 Future iterations of the IIA Report will include a summary of potential cumulative effects from each group of policies upon each SA objective, together with a commentary outlining specific predicted cumulative effects. This will include consideration of the potential for cumulative and synergistic effects associated with other plans and programmes.

### 3.8 Monitoring

- 3.8.1 It is a requirement of the SEA regulations to establish how the significant sustainability effects of implementing the Local Plan will be monitored. However, as earlier government guidance on SEA (ODPM et al, 2005) notes, it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects, including unforeseen adverse effects. Monitoring the Local Plan for sustainability effects can help to answer questions such as:
- Were the predictions of sustainability effects accurate?
  - Is the Local Plan contributing to the achievement of desired SA objectives?
  - Are mitigation measures performing as well as expected? and
  - Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?
- 3.8.2 Monitoring should be focussed on:
- Significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused;
  - Significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
  - Where there is the potential for effects to occur on sensitive environmental receptors.
- 3.8.3 The SA Framework produced by the Council includes a comprehensive suite of indicators at column two, which includes sources of information, e.g. the AMR. This approach is welcomed and should help ensure compliance with the SEA Regulations. Later stages of the Local Plan will include arrangements for monitoring and it is recommended that the indicators identified in the SA Framework are included in the proposed indicators that will be used to monitor the Local Plan.

### 3.9 Recommendations (including Mitigation)

3.9.1 It is clear from the material produced by the Council to inform the LPU that a great deal of thought has gone into the need to update policies in the ALP and the need for new policies. Detailed consideration has also been given to compliance with the revised NPPF. Consequently, the recommendations arising from the IIA at this stage are limited, however additional recommendations may arise as additional elements of the Local Plan are assessed. The Council is not required to accept a recommendation but will be asked to provide a response to each of them. Subsequent iterations of the IIA Report will include a compilation of recommendations and the Council's responses. This will help to document how the IIA has then influenced the evolution of the Local Plan at each stage of preparation. Recommendations identified to date are summarised in **Table 3.1** below.

#### Cross Referencing of Policies

3.9.2 It is appreciated that cross referencing of Local Plan policies within other policies is generally discouraged and that the plan should be read as a whole. However, given the way that policies are structured a common question that came out of the assessment of policies covering similar topic areas was whether or not they would benefit from selective cross referencing (alternatively cross referencing could be included in the supporting text). The following are examples:

- Policy CC1 'A Carbon Neutral, Climate Adapted Borough' seeks to maximise opportunities for renewable and low carbon energy generation and decentralised energy and heating.' This could cross reference Policy NP10 - Renewable and Low Carbon Energy Generation, which includes detailed criteria for such proposals.
- Policy CC1 is an overarching policy in relation to climate change adaptation and mitigation and as such could cross reference policies that implement specific provisions, e.g. in relation to green infrastructure, sustainability standards etc. This is important as the policies will likely be sitting in different sections of the Local Plan but also helps demonstrate how the Local Plan will help ensure that the intentions set out in CC1 are delivered.
- Policy EM2 'Strategic Gaps' could cross reference Policy EM1 in relation to 'Landscape' and EM5 on 'Green and Blue Infrastructure'.
- Policy EM6 'Water Quality' could cross reference Policy NP5 'Solent Protected Sites,' which also contains key principles in relation to water quality for the protected sites.
- Policy EM12 'Pollution and Air Quality' could cross reference policy EM6 'Water Quality, which deals with water related pollution.

3.9.3 It is important to stress that Wood is not suggesting that these changes need to be made to mitigate or avoid significant effects, nor that policies need re-structuring. The suggestion is made to ensure that those using the Local Plan to inform development of their proposals are signposted to other relevant policies.

Table 3.1 Recommendations

Topic / Policy	Date	Recommendation
Delivery of strategy and overarching policies  Policy CC1 - A Carbon Neutral, Climate Adapted Borough	February 2022	Policy CC1 as currently worded seeks to maximise opportunities for renewable and low carbon energy generation in the borough. It is suggested that the term 'optimise' is used instead of 'maximise.' As worded the policy could result in negative impacts on landscape and geodiversity (SA9), heritage (SA10) and settlement character (SA11) at the local level. Policy NP10 'Renewable and Low Carbon Energy Generation' includes relevant criteria but there could be conflicts between the two policies. Alternatively Policy NP10 could be cross-referenced.
Delivery of strategy and overarching policies  Policy SS6 'Homes in the Countryside'	February 2022	The criteria for 'Homes in the Countryside' includes consideration of whether or not sites involve the development of previously developed land. It is suggested that the policy could include reference to the Council's Brownfield Land Register (as a further indication of site suitability). It is acknowledged that only sites of 0.25ha or more are included on the register so the number of sites falling under this criterion may be limited.
Housing – NP2 'Accessible and Adaptable Homes'	February 2022	It is recommended that this includes a caveat to enable lower provision for accessible homes, in those instances where it cannot be achieved (please also see the discussion around the consideration of reasonable alternatives in relation to this policy).  The policy may also need an amendment so that it is positively prepared, in line with the NPPF.
EM4 - Biodiversity, Geodiversity & Nature Conservation	February 2022	A detailed observation on EM4 is that it may need a statement/criteria to provide a clear link between the first part of the policy, which relates to avoidance of significant harm and the second part, which is focussed on biodiversity net gain. Clearly the argument could be made that the policy should be read as a whole but part (1) of the policy could be amended to emphasise that the objective of achieving net gain applies in all instances, including those where mitigation is required to avoid significant harm.
NP8 – Energy Requirements	February 2022	It is suggested that consideration is given to data enabling measures to capture actual energy use in new developments. It is suggested that new build and major retrofit schemes should have the capacity to transmit metered supply data; that way real life operational emissions can be determined

Topic / Policy	Date	Recommendation
		and hence accurate offset needs (rather than high level estimates and/or prescribed levels). There are already forms of legal agreement drawn up that facilitate individual meter data being shared anonymously to enable use of real data in Greenhouse Gas (GHG) emission calculations.
NP8 – Energy Requirements	February 2022	It is suggested that care is taken in assessing costs to developers associated with the proposed policy. This ensures a positive engagement route with developers, rather than challenges regarding proposed costs, or lack of interest in development given the opportunity to develop in different regional areas (elsewhere in the UK) at lower cost.
NP8 – Energy Requirements	February 2022	It is suggested that the Council demonstrates that it has explored other options to a local offset fund including considering the costs and benefits of the different approaches.
All topics – cross referencing of policies	February 2022	It is appreciated that the Local Plan must be read as a whole, however in undertaking the SA a number of instances where policies could cross reference other key policies where identified (see <b>Section 3.9</b> of this report for details).
Monitoring	February 2022	The SA Framework produced by the Council includes a comprehensive suite of indicators at column two, which includes sources of information, e.g. the AMR. It is recommended that these indicators are incorporated in the monitoring indicators for the Local Plan.



## 4. Conclusions and Next Steps

### 4.1 Introduction

4.1.1 This section briefly summarises the key conclusions from the report and sets out the next steps, including details of how to comment on this report.

### 4.2 Key Conclusions Emerging from the Appraisal and Plan Making Process

4.2.1 This report is focussed on a number of draft strategic and development management policies covering issues including the environment, climate change and design due to be presented to councillors at committee in March 2022. This report reflects the focus of the policies under consideration but has also been written so as to provide the structure to future updates to the assessment.

4.2.2 In undertaking the LPU the Council has considered a number of factors:

- An assessment of how a current policy in the ALP is working;
- A consideration of the extent to which a policy is compliant with national level planning guidance;
- Synergy with current and developing local strategies and priorities; and
- Advice and discussion with stakeholders, partners and a Local Members Advisory Panel.

4.2.3 The work undertaken by the Council has been reviewed and options that constitute reasonable alternatives have been assessed. The Council has indicated why preferred options have been incorporated into policy.

4.2.4 This report concludes that the Local Plan policies that are currently being issued to Council Committees for Member comment and consideration, are anticipated to have significant positive effects across the SA objectives. This does not factor in potential negative effects associated with other elements of the Local Plan. The results of the SA will be reviewed in the round as part of later iterations of the SA.

4.2.5 Significant positive effects have been identified in relation to a range of objectives, for example:

- **Delivery of strategy and overarching policies:** Policy CC1 sets out a number of high level principles aimed at reducing the borough's carbon footprint, achieving carbon neutrality by 2030 through measures associated with construction and operation of buildings, economic activity, resource use and travel an offset fund might be required to enable developments to be carbon neutral. Significant positive effects are identified in relation to the following SA objectives: SA3 'Travel,' SA4 'Pollution,' SA5 'Resources,' SA7 'Water Resources' and SA12 'Economy.' Other policies will contribute to climate change mitigation and will also make a significant positive contribution to these



objectives, notably NP8 - Energy Standards for New Development, NP9 - Sustainable Design, Construction and Adaptation, NP10 - Renewable and Low Carbon Energy Generation.

Policy CC1 also seeks to mitigate against anticipated climate change by directing development away from areas at risk of flooding and securing green infrastructure. Significant positive effects are identified in relation to the following SA objectives on this basis: SA2 'Health,' SA6 'Biodiversity' and SA8 'Flood Risk;'

- **Community needs:** Updates to policy in relation to housing will help ensure that locally identified needs, in terms of the mix and type of homes can be met with significant positive effects identified in relation to SA1 'Housing' and SA2 'Healthy communities and that regeneration, including redevelopment and retrofitting of the existing built stock continues.

Given the contribution that other policies make to delivery of sustainable communities (CN7 - new and improved facilities, CN8 - protection of community facilities and CN9 - support for improved access to Basingstoke town centre), these policies have been assessed as having potential for significant positive cumulative effects in relation to SA2 'Healthy communities', SA3 'Travel' and SA4 'Pollution' and SA14 'Services and facilities'.

- **Environmental management and climate change:** Policies under this topic cover a range of matters, including landscape, green infrastructure, environmental protection, climate change mitigation and adaptation and design. A range of significant positive effects are identified; for example, NP11 'Overarching Design Principles' and NP12 'Site Design' are assessed as having a significant positive effect on SA1 'Housing', SA2 'Healthy Communities', SA6 'Biodiversity', SA7 'Water Resources,' SA8 'Flooding' and SA14 'Services and Facilities.'
- **Supporting the economy:** Updates to policies on the economy include amendments to ensure that existing employment sites are protected, a flexible approach can be taken to the provision of land for employment, whilst promoting clean growth. Taken together, the employment policies could have a cumulative significant positive effect in relation to objective SA2 'Healthy Communities' and objective SA3 'Travel.'

4.2.6 No significant policy gaps have been identified at this stage.

## 4.3 Recommendations

4.3.1 A set of recommendations have been provided and are set out in **Table 3.1**. These are detailed in nature and do not constitute mitigation of potential significant negative effects.

4.3.2 For example, Policy CC1 'A Carbon Neutral, Climate Adapted Borough' as currently worded seeks to maximise opportunities for renewable and low carbon energy generation in the borough. It is suggested that the term 'optimise' is used instead of 'maximise.' As worded the policy could result in negative impacts on landscape and geodiversity (SA9), heritage (SA10) and settlement character (SA11) at the local level. Policy NP10 'Renewable and Low Carbon Energy Generation' includes relevant criteria but there could be conflicts between



the two policies. Alternatively Policy NP10 'Renewable and Low Carbon Energy Generation,' which includes detailed criteria for the location of such development could be cross-referenced.

- 4.3.3 Additional recommendations may arise as additional elements of the Local Plan are assessed and any additional recommendations will be included in later iterations of this Report.

## 4.4 Next Steps

- 4.4.1 This Interim Report (the Report) focusses on the SA/SEA of the policies (and associated options) that are currently being issued to Council Committees for Member comment and consideration.
- 4.4.2 The intention is to undertake full IIA once the Local Plan is at a more advanced stage to support the regulation 18 consultation. The IIA will incorporate Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). These elements of the IIA will be completed in draft form and also consulted on alongside later versions of the Local Plan.

## 4.5 Quality Assurance

- 4.5.1 This Report has been prepared in accordance with the relevant requirements of the SEA Regulations. A Quality Assurance Checklist is presented at **Appendix A**. This will be updated in later versions of this Report.

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