



London Borough of Richmond upon Thames

Supplementary Planning Document:

Small and Medium Housing Sites

INITIAL DRAFT SUSTAINABILITY APPRAISAL REPORT

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Document:
2742_SA_housing
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Date: September 2005

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1 Introduction

- 1.1. This document is the Sustainability Appraisal of the London Borough of Richmond upon Thames Supplementary Planning Document: Small and Medium Housing Sites.
- 1.2. The SPD is one of a family of such documents commissioned by the London Borough of Richmond upon Thames which will assist in interpreting local planning policy. It concerns residential development only and applies to small and medium housing sites which includes developments of up to 20 homes in 'infill' and 'backland' locations, as well as one-off houses and the intensification of sites for apartments. The Council already has adopted Supplementary Planning Guidance for residential development (Guidelines for Small Housing Sites) which will be replaced by this SPD
- 1.3. The quality of the residential environment is a major concern of local residents and it is essential to protect and enhance the character of established residential areas. The Small and Medium Housing Sites SPD was commissioned in response to an Urban Design/Planning Outcomes Study that indicated the need for generic design guidance in relation to the following:
 - Respect for Context (local, character and architecture)
 - Quality of Detailing (including materials, fixtures and finishes)
 - Quality of Submissions (plans, models etc.)
- 1.4. A series of strategic objectives for the Small and Medium Housing Sites SPD are shown in Table 1. These were defined by the Design Quality SPD which provides the overall context for design in the Borough. The objectives developed from the Council's ambitions for the SPD's and the principles of urban design defined by the Commission for Architecture and Built Environment (CABE).

Table 1: SPD Objectives	
Economic	
Council	To ensure a clear understanding of what is expected of developers when submitting planning applications
Council	To ensure consistency in design making and avoid planning delays
Social	
CABE	To promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society including disabled and elderly people
CABE	To promote accessibility and local permeability by making places which connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport
CABE	To promote legibility through development that provides recognisable routes, intersections and landmarks to help people find their way around
CABE	To promote diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs

Environmental	
Council	To protect and enhance local distinctiveness, character and the appearance of the Borough when new development is proposed
Council	To raise the overall quality of urban design and architecture of new developments within the Borough, reiterate that poor quality design will not be tolerated, and to set out the Council's commitment to high quality urban design
CABE	To promote continuity of street frontages and the enclosure of space by development which clearly defines private and public areas.
Council	To provide a basis for refusing developments that do not meet those requirements outlined in the approved Guidance
CABE	To promote adaptability through development that can respond to changing, environmental, social, technological and economic conditions.

2. Context

- 2.1. The SPD will form part of the Local Development Framework, following public consultation. As an adopted planning document it is a material consideration when determining planning applications and may be used to seek amendments to or refuse development on the grounds of poor design. The following diagram highlights the inter-related policy and guidance linkages which have led to the production of this Guide.



2.2. The Small and Medium Housing Sites SPD has been compiled to be representative of national and local planning policy and to recognise best practice in design guidance. With regard to the needs of the design guidance the following documents stated in table 2 have been considered.

Table 2: National and Local Context			
	Title	Author/Date	Relevance to the SPD
National	By Design: Better Places to Live	DTLR and CABE 2001	<p>Focuses on the urban design principles and approaches which underpin successful housing.</p> <ul style="list-style-type: none"> - A highly influential and important document which relates to CABE's principles of urban design and the need for better design in the context of higher density requirements.
	By Design. Urban Design in the Planning System: Towards Better Practice	DETR and CABE 2000	<p>Published to promote higher standards of urban design through planning. Sets objectives of urban design and prompts to thinking about the effect of these objectives on development form.</p> <ul style="list-style-type: none"> -A core document which sets the framework for national urban design guidance and the context for the Design Quality SPD.
	Urban Design Compendium	English Partnerships August 2000	<p>Published in partnership with Housing Corporation, this document examines the factors that make neighbourhoods stimulating and active places.</p> <ul style="list-style-type: none"> - Supplements the range of guidance produced by CABE.
	Places, Streets and Movement	DETR 1998	<p>Takes an integrated approach to the design of residential development, advising designers on how they can be more creative with road layouts to achieve better quality urban design, while supporting sustainable mobility.</p> <ul style="list-style-type: none"> - Relates to the theme of streets for people, not just vehicles; a key theme to creating quality living environments.
	Building in Context. New Development in Historic Areas	English Heritage and CABE 2001	<p>Aims to stimulate a high standard of design when development takes place in historically sensitive contexts.</p> <ul style="list-style-type: none"> - Since the Borough has many listed buildings and conservation areas such advice is particularly useful.

Table 2: National and Local Context

	Title	Author/Date	Relevance to the SPD
National	Safer Places: The Planning System and Crime Prevention	ODPM 2004	Through best practice, addresses the principles of crime prevention and the attributes of safer places. - Crime is a key concern and ways of reducing the fear and instances of crime through design will need to be covered by the SPD.
Local	London Borough of Richmond upon Thames UDP	LB Richmond upon Thames 2005	The present adopted planning policy document for the Borough which sets the local planning context. - The Built Environment section refers to design issues and sets the baseline for design guidance.
	Guidelines for Small Housing Sites	LB Richmond upon Thames	The present residential SPG and current 'baseline.' - The guidance refers mainly to backland development.

- 2.3. Under the Planning and Compulsory Purchase Act 2004, sustainability appraisal (SA) is mandatory for Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). SA's should incorporate the requirements of the Strategic Environmental Assessment Directive through the carrying out of a single appraisal process.

- 2.4. Good practice in SEA/SA emphasises the value of integrating the assessment with the plan or programme process so that on going work is not lost as a completely different work-stream or by a separate body. The SA process has therefore been undertaken by Taylor Young, authors of the SPD: Small and Medium Housing Site, based on current practice and Sustainability Objectives defined by the London Borough of Richmond upon Thames.

- 2.5. The level of detail and resource for the SA process has been dictated by that appropriate to the scale of this commission; the total professional time for the guide is 21 days, of which 2 days have been programmed for sustainability appraisal. Sufficient commentary to justify the conclusions and potential omissions/shortfalls is provided. The SA has been written in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, and with draft guidance published by the ODPM on the Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks.

3. Baseline

- 3.1. Guidance for SEA/SA stipulates that information relevant to the current state of the environment, economy and social aspects likely to be significantly affected should be provided to act as a baseline. This represents the evolution of the Borough without implementation of the SPD.
- 3.2. To establish the baseline, statistical information on the Borough has been obtained from various sources. The information below represents that currently available. As part of the monitoring process any missing data will be subsequently added later.

Economic Indicators

- 3.3 The economy of the Borough remains generally buoyant with low unemployment. Nearly 88% of workers are employed in service industries. Hotels and catering account for 6% of the Borough's workplace jobs, while professional and personal services contribute 10% and 8% of jobs respectively. A continuing trend over the last decade has been for the creation of more jobs relating to construction and property development. The Borough has the largest proportion of self-employed residents of all but one of the London Boroughs, currently standing at 12.4%. (2001 Census). Over two-thirds of businesses are sole traders or independents. The size of businesses is generally small with fewer than ten employees, including branches or divisions of larger companies. Tourism is a particularly strong element of the local economy, attracting four and a half million visitors to the Borough each year, making a substantial provision to the number of jobs available locally.

Employment	Unemployment (%)	2.2 ¹
	Long term unemployed (%)	0.61 ¹
	Indices of deprivation:	
	Employment Income	166 ¹ 184 ¹
Business	Proportion of retail in key frontages (%)	70.7 ⁶
	Quantitative economic data on the production of jobs in different sectors of the economy	??
	Number of VAT registrations	??
	Number of VAT de-registrations	??

Social Indicators

- 3.3. The Borough benefits from a relatively healthy and safe community. In comparison to the national rate of good health of 68.55²%, 76.33% of the population is in good health, with those in not good health, less than the national average of 9.22²%. The main types of crime in Richmond upon Thames are burglary, theft and motor vehicle crime. The total number of notifiable offences for the Borough from April 2002 to March 2003 was 16,814, an increase of 5% on the previous year. The figures for Richmond upon Thames are the third lowest for all London Boroughs and account for 1.6% of all notifiable offences in the Metropolitan Police Area. Recorded crime in the Borough is below the national average of England and Wales for all crimes, except robbery which is marginally higher at 1.7 (per 1,000) compared to 1.5⁵. Despite such a lower crime rate, fear of crime is still a concern.

- 3.4. The Borough benefits from 96 parks² together with two Royal Parks and the Royal Botanical Gardens at Kew. Approximately 32%³ of the Borough is open space.

Table 4: Social Indicators		
Health	General Health: Good (%)	76.33 ²
	General Health: Not Good (%)	5.9 ²
	People with limiting long term illness (%)	12.39 ²
	Households with one or more person with limiting long term illness (%)	22.97 ²
Crime	Total reported crimes (number per thousand residents per annum)	104.67 ²
	Violence against the person (offences per 1000 pop)	14.7 ⁵
	Sexual offences (offences per 1000 pop)	0.6 ⁵
	Robbery (offences per 1000 pop)	1.7 ⁵
	Burglary of dwellings (offences per 1000 pop)	7.5 ⁵
	Theft of motor vehicle (offences per 1000 pop)	3.6 ⁵
	Theft from motor vehicle (offences per 1000 pop)	10.1 ⁵
Road safety	Number of KSI (killed or seriously injured) accidents	124 ⁶
Open Space	Data on the quality of open space within the Borough	??

Environmental Indicators

- 3.5. The local community has a clearly expressed view that the Borough's natural and built environment, which is of the highest quality, should be protected and enhanced. The Borough benefits from 70 conservation areas and over 1,200 listed buildings. The Borough's preserved habitats include Crane Park Island, Whitton, and the London Wetlands Centre in Barnes. The Wetland Centre has over 40 hectares of lakes, ponds and marshes, created from four disused reservoirs on the site.

Table 5: Environmental Indicators		
Quality of Built Environment	Conservation Areas (total number)	70
	Qualitative information on Conservation Area Appraisals	??
	Listed Buildings	1,200 ¹
	Listed Buildings 'at risk'	??
	Number of applications refused on design grounds, won on appeal	??
Biodiversity	Sites of Nature Conservation Importance with good general ecological information (%)	98% ³
	Condition and extent of Biodiversity Action Plans	??
Waste	Total waste arising to land fill (tonnes p/a)	>60,000 ⁴
	Waste recycled (%)	24 ⁴
Environmental Quality	Air quality ▪ Average Nitrogen Oxide Concentrations	26-46 ug ³
	Water quality	Excellent ³
Land use	Number of derelict sites	??
	Proportion of housing development taking place on previously developed land (%)	??

Energy Efficiency	New build homes meeting EcoHomes Very Good standard (%)	??
	Commercial buildings meeting BREEAM Very Good standard (%)	??
	Renewable energy capacity (%)	??
Travel	Modal split of people travelling into Richmond Town Centre	??
	Method of travelling to work for all residents in the Borough	??
	Cycle ways (total km)	80 ⁴

Sources

¹ 2004 Borough Profile

<http://www.richmond.gov.uk/boroughprofile-2.doc>

² 2005 National Statistics

<http://www.neighbourhood.statistics.gov.uk/dissemination/AreaProfile2.do?tab=3>

³ 1997 Local Agenda 21 Strategy

http://www.richmond.gov.uk/agenda_21_strategy_pdf.pdf

⁴ 2005 London Borough of Richmond website

⁵ BBC.co.uk

http://news.bbc.co.uk/1/shared/spl/hi/uk/02/cracking_crime/my_area/results/html/bd.stm

⁶ 2005 Richmond upon Thames, LDF Draft Sustainability Appraisal Scoping Report

- 3.6. Guidance for SEA/SA also states that information on any existing environmental problems relevant to the plan should be provided. Since the Small and Medium Housing Sites SPD concerns the design of the built environment it is worth stating some of the results of the planning outcomes survey, which in turn led to the commission of the SPD.
- 3.7. Delegates of the Urban Design/Planning Outcomes survey in August 2004 expressed a view that the Council did an acceptable job in urban design terms. Feedback was more critical against schemes which were upheld on appeal and it was felt that the Inspectorate had less understanding of local distinctiveness and as consequence approved 'conceptually flawed' proposals. It was felt that if the Borough had a more thorough townscape analysis methodology for reviewing schemes, standards would be raised and fewer appeals lost.

4. Methodology

4.1. The process for SA as defined by “A Practical Guide to the Strategic Environmental Assessment Directive” (2005 ODPM) involves the following procedure:

- Testing the plan or programme objectives against the SEA objectives
- Developing strategic alternatives
- Predicting and evaluating the effects of the plan or programme, including alternatives
- Considering ways of mitigating adverse effects
- Proposing measures to monitor the environmental effects of the plan or programme implementation

SEA/SA Objectives

4.2. The Council has established a list of 15 Sustainability Appraisal Objectives for its Local Development Framework. These will inform the appraisal of all Local Development Documents – both Development Plan documents and Supplementary Planning Documents. This will ensure consistency of approach across the full range of planning policy produced by the Council.

4.3. Options for the SPD will need to be tested against SA objectives to identify potential synergies and inconsistencies in terms of the sustainability of the SPD and any alternatives (options). In order to test that the objectives of the SPD are in accordance with sustainability objectives they have been tested for compatibility with the Council’s SEA/SA objectives (See Table 6).

Table 6: SEA/SA Objectives
1) To promote sustainable waste management, including reducing waste and waste disposal, promoting recovery, reuse and recycling.
2) To make the most efficient use of land and to reduce contamination and safeguard soil quantity and quality.
3) Reduce air and noise pollution, including greenhouse gases, and ensure air quality improves.
4) Minimise congestion and pollution by reducing the need to travel, encourage alternatives to the car and making best use of existing transport infrastructure.
5) To maintain or where possible improve water quality, conserve water and reduce the risk from flooding.
6) To promote sustainable energy use through reduced energy use, improved energy efficiency and increased use of renewable energy.
7) Conserve and enhance biodiversity avoiding irreversible losses, through responsible management of key wildlife sites, connecting and other areas.

Table 6: SEA/SA Objectives

8) Promote high quality places, spaces and buildings & conserve and enhance the landscape and townscape character of the borough including historical features for the benefit of both residents and visitors
9) To make best use of previously developed land and existing buildings, encouraging sustainable construction practices
10) To provide new housing opportunities and sufficient affordable housing that meets local needs.
11) To create and maintain safer, more secure and more cohesive communities.
12) To facilitate the improved health and well being of the population, including enabling people to stay independent and ensuring access to those health, education, sport, leisure and recreation facilities and services that are required.
13) To increase the vitality and viability of existing town centres, local centres and parades.
14) To promote and encourage a buoyant and diverse economy that will provide sustainable economic growth.
15) Provide appropriate commercial development opportunities to meet the needs of the local and sub-regional economy.

Options for the Small and Medium Housing Sites SPD

- 4.4 In order to carry out an SA of the SPD, a range of reasonable alternatives must be identified and tested against the SA Objectives. Since the SPD covers the entire Borough and is therefore not site specific, defining a range of options is difficult.

“Options taken forward should be reasonable, realistic and relevant. They should also be sufficiently distinct in order to highlight the different sustainability implications of each, so that meaningful comparisons can be made.”
(p 143 SA of RSS and LDFs – consultation paper)

- 4.5 Given the resource constraints of the commission only two options have been devised based on a ‘business as usual’ approach and implementation of the SPD:

OPTION 1 – Retain current SPG

Presume that the current SPG would not be replaced and continue to use it to supplement the UDP.

OPTION 2 – Adopt the Small and Medium Housing Sites SPD

Take forward and adopt the Small and Medium Housing Sites SPD to be used as council policy when considering planning applications for housing development in small and medium housing sites. The document would be supplementary to the UDP and adopted Design Quality SPD

Predicting and evaluating the effects

- 4.4. In order to test the sustainability of each option they were assessed against the Council's 15 SA Objectives. The test involves the prediction of effects and changes to the baseline indicators as a result of implementing each option. Since the SPD is concerned with design, to avoid duplication of assessment, this assessment was based purely on an analysis of options in terms of how design guidance or policy would effect the baseline position. Due to the difficulty in defining possible quantitative effects, current practice is to express effect qualitatively on a scale from ++ (very positive) to -- (very negative). The scoring matrix adopted for the sustainability appraisal is show in table 7.

Symbol	Explanation
+ + or +	The option meets the criteria and has a positive impact. The degree of positive impact relates to the number of signs
- - or -	The option fails to meet the criteria and has a negative impact
?	The impact of the option is questionable
N/A	The criteria is not relevant against the policy

- 4.5. SEA/SA advice states that predictions need to be supported by evidence. However, given the difficulties and uncertainties in obtaining such evidence, prediction is based on assumptions resulting from underlying trends. To enhance transparency, reasons for the stated effect are summarised in the sustainability appraisal.
- 4.6. Sustainability Appraisal can be a subjective and judgemental exercise. Its success is dependent on the expertise and knowledge of the appraisal team who should balance the views of economic, social and environmental needs as much as possible. In an ideal situation the sustainability appraisal would be undertaken as a round table discussion with representatives from the economic, social and environmental sector, however this did not comply with the resource implications of the commission.

5. Sustainability Appraisal

5.1. The following matrixes (tables 8 and 9) set out the findings of the SA process. A commentary is provided to identify the reasoning behind each predicted impact.

Option 1- Retain current SPG

5.2.

Table 8: Appraisal of Option 1		
SEA/SA objectives	Impact	Comment
1) To promote sustainable waste management, including reducing waste and waste disposal, promoting recovery, reuse and recycling.	?	Some design considerations given to re-using old buildings for housing (HSG13) but no mention in SPG.
2) To make the most efficient use of land and to reduce contamination and safeguard soil quantity and quality.	-	Mentions the opportunity of developing extensive back gardens and accepts possibility but offers limited advice, which may have a negative impact on quality. No mention of soil- although not applicable in terms of design.
3) Reduce air and noise pollution, including greenhouse gases, and ensure air quality improves.	-	No mention of air and noise pollution attenuation measures. Accepts that new roads and parking may lead to noise and nuisance but offers no advice to reduce the impact. Energy efficiency (BLT 31) and sustainable transport (TRN1 and 2) policies in UDP.
4) Minimise congestion and pollution by reducing the need to travel, encourage alternatives to the car and making best use of existing transport infrastructure.	+	SPG is biased towards needs of vehicular access with no mention of pedestrian environment, however supporting UDP policies prioritise pedestrians in new development (TRN9). Some guidance for pedestrian environment (TRN10). Improvements to public transport mentioned in TRN 13.
5) To maintain or where possible improve water quality, conserve water and reduce the risk from flooding.	?	Retention of natural landscape features may help to reduce rate of run off and concentrated peak flows, however no specific reference to effect of proposals on water quality and run off, although part of UDP policy ENV 34.

Table 8: Appraisal of Option 1		
SEA/SA objectives	Impact	Comment
7) Conserve and enhance biodiversity avoiding irreversible losses, through responsible management of key wildlife sites, connecting and other areas.	+	Retention of natural landscape may conserve biodiversity. Aspects of nature conservation through building and landscape design mentioned in policy ENV19.
8) Promote high quality places, spaces and buildings & conserve and enhance the landscape and townscape character of the borough including historical features for the benefit of both residents and visitors.	?	Specific design guidance and Design considerations in policy BLT11 cover many aspects but the fact that new guidance has been commissioned indicates weakness.
9) To make best use of previously developed land and existing buildings, encouraging sustainable construction practices.	-	Mentions the opportunity of developing extensive back gardens and accepts possibility but offers limited advice, which may have a negative impact on quality. No reference to sustainable construction in addition to BLT31.
10) To provide new housing opportunities and sufficient affordable housing that meets local needs.	-	Infill and backland sites offer new housing opportunities but limited nature of guidance may not unlock the full potential of sites or quality. No mention of affordable housing in terms of design.
11) To create and maintain safer, more secure and more cohesive communities.	-	Some design guidance with policy BLT 17 but largely vague. No specific residential design guidance in terms of safety or security.
12) To facilitate the improved health and well being of the population, including enabling people to stay independent and ensuring access to those health, education, sport, leisure and recreation facilities and services that are required.	--	No mention of public open space or the pedestrian environment. Emphasis on car may compromise walking and outdoor areas. No mention of accessibility or 'lifetime homes' for example.
13) To increase the vitality and viability of existing town centres, local centres and parades.	N/A	Not applicable as purely for residential environment.
14) To promote and encourage a buoyant and diverse economy that will provide sustainable economic growth.	N/A	Not applicable as purely for residential environment.
15) Provide appropriate commercial development opportunities to meet the needs of the local and sub-regional economy.	N/A	Not applicable as purely for residential environment.

Option 2- Produce the Small and Medium Housing Sites SPD

5.3.

Table 9: Appraisal of Option 2		
SEA/SA objectives	Impact	Comment
1) To promote sustainable waste management, including reducing waste and waste disposal, promoting recovery, reuse and recycling.	?	The need to consider storage for recycling material is mentioned in 4.1. Advice on reuse of older buildings within Design Quality SPD will improve the re-use of building material.
2) To make the most efficient use of land and to reduce contamination and safeguard soil quantity and quality.	++	More efficient use of land may be prompted by intensification possibilities mentioned in 2.3 and 3.2. This is unlikely to be to the detriment of character as both paragraphs mention the need to harmonise with the locality. Design quality SPD aims to make efficient use of a site's assets through Context and Character Appraisal.
3) Reduce air and noise pollution, including greenhouse gases, and ensure air quality improves.	?	Mention of daylighting and passive solar gain in 4.2 may improve energy efficiency and have knock on effect on air pollution?
4) Minimise congestion and pollution by reducing the need to travel, encourage alternatives to the car and making best use of existing transport infrastructure.	+	Emphasis on pedestrian priority and Home Zones may help to reduce car reliance and improve alternatives to the car. As will emphasis on pedestrians through Design Quality SPD.
5) To maintain or where possible improve water quality, conserve water and reduce the risk from flooding.	?	Guidance on permeable materials and retention of natural landscape features will help to reduce rate of run off and concentrated peak flows.
6) To promote sustainable energy use through reduced energy use, improved energy efficiency and increased use of renewable energy.	?	Mention of daylighting and passive solar gain in 4.2. No detailed mention of sustainable energy use or energy efficiency.

Table 9: Appraisal of Option 2		
SEA/SA objectives	Impact	Comment
7) Conserve and enhance biodiversity avoiding irreversible losses, through responsible management of key wildlife sites, connecting and other areas.	?	Retention of natural landscape features and complementary species may conserve and enhance biodiversity. Perhaps not an issue at the scale of infill/backland development?
8) Promote high quality places, spaces and buildings & conserve and enhance the landscape and townscape character of the borough including historical features for the benefit of both residents and visitors.	++	By understanding the trends of past 'typologies' and targeting advice to the specifics of infill and backland sites, the SPD will have a very positive effect on future house building. This objective is a key aspect of the Design Quality SPD as well, expressed throughout the guidance. Most specifically under the headings of character, continuity and enclosure and public realm.
9) To make best use of previously developed land and existing buildings, encouraging sustainable construction practices.	+	More efficient use of land may be prompted by intensification possibilities mentioned in 2.3 and 3.2. This is unlikely to be to the detriment of character as both paragraphs mention the need to harmonise with the locality. Design quality SPD aims to make efficient use of a site's assets through Context and Character Appraisal. <i>No mention of sustainable construction practices.</i>
10) To provide new housing opportunities and sufficient affordable housing that meets local needs.	++	Advice on diversity states an insistence on quality for affordable housing, with related advice.

Table 9: Appraisal of Option 2		
SEA/SA objectives	Impact	Comment
11) To create and maintain safer, more secure and more cohesive communities.	++	4.3 offers specific guidance in terms of security for residential development. Home Zone principles should create a safer pedestrian environment. Refusal of gated developments and advice for affordable housing should assist cohesiveness.
12) To facilitate the improved health and well being of the population, including enabling people to stay independent and ensuring access to those health, education, sport, leisure and recreation facilities and services that are required.	+	Promotion of 'Lifetime Homes' should increase supply of adaptable homes. Design Quality SPD's emphasis on pedestrian priority and well designed public realm, orientated to the needs of pedestrians may foster a more 'outdoor' and healthy lifestyle. Inclusive design advice should widen access to new development.
13) To increase the vitality and viability of existing town centres, local centres and parades.	N/A	Not applicable as purely for residential environment.
14) To promote and encourage a buoyant and diverse economy that will provide sustainable economic growth.	N/A	Not applicable as purely for residential environment.
15) Provide appropriate commercial development opportunities to meet the needs of the local and sub-regional economy.	N/A	Not applicable as purely for residential environment.

6. Conclusion

Option 1

- 6.1. The present SPG supplements the policies of the UDP, expanding on issues relevant to small housing sites. Through the targeted nature of the design guidance many issues relating to the sustainability objectives appeared to be ignored by the present SPG however such broader issues were likely to be picked up by the UDP. As an example, the emphasis on vehicular access and little or no mention of the pedestrian environment was thought to compromise alternatives to the car. However, the general issue of sustainable transport is perhaps irrelevant at this scale of the plan hierarchy since it is covered in the UDP.
- 6.2. In reference to the most applicable 'design' objective of promoting high quality places, spaces and buildings it was difficult to define whether the vagueness of the design guidance would have much of a positive effect. It would certainly be more positive than not having a SPG however the views of the Planning/Urban Design Outcomes Survey and the fact that the present guidance was dated show that there was weakness in the present SPG.
- 6.3. Many of the negative scores for option 1 seem to be symptomatic of the age of the design guidance. The SPG appears to have been written at least fifteen years ago and is a reflection of the priorities and design concepts which were good practice at the time of writing. Priorities have since changed and there is now more emphasis on sustainability issues such as climate change and sustainable construction.

Option 2

- 6.4. As well as supporting the UDP, the Small and Medium Housing Sites SPD would supplement the adopted Design Quality SPD, expanding on issues specific to the design of small and medium housing sites. In this sense, option 2 benefits from the positive impacts of the Design Quality SPD even though, through its targeted advice, it appears to pay less attention to some sustainability issues.
- 6.5. Option 2 scores most highly in sustainability objectives 8, 10 and 11, which reflect the intended focus of the design guide. Specific advice on designing in context, affordable home design and security in the home complement the strong emphasis on these issues in the Design Quality SPD. The more efficient use of land will also be a by product of the SPD since it concerns backland and infill development. Such intensification is likely to be handled better with a specific design guide and not to the detriment of character.
- 6.6. Issues of energy efficiency have some reference in terms of daylighting and passive solar gain but it is perhaps weak in its approach. Sustainable construction techniques are also ignored and the SPD may benefit from additional energy efficiency and sustainable construction advice. Issues of biodiversity and open space are also faint in their emphasis however this was not thought to be a weakness, since the SPD is only concerned with small sites and are likely to have limited opportunities for open space.
- 6.8. In considering the two options it was therefore felt that the adoption of the Small and Medium Housing Sites SPD was the most sustainable option.

7. Consultation

7.1. To this stage the Small and Medium Housing Sites SPD has not be subject to public consultation. Consultation has been confined to the members of the steering group. The steering group includes officers and elected members and is shown in table 10.

Table 10: Steering Group Members		
Officers	Robert Angus	Development Control
	Richard Brooks	Conservation Officer
	Helen Cornforth	Policy Manager
	Gareth Jones	Urban Design and Conservation Manager
	Diana Rice	Policy and Plans Co-ordinator
	Roy Summers	Assistant Development Control Manager
Members	Cllr Frances Bouchier	
	Mr Paul Drury	Co-opted Member
	Cllr Martin Elengorn	
	Cllr David Marlow	Cabinet Member for Environment and Planning

7.2. The consultation period for the Design Quality SPD and this Initial Draft Sustainability Report is due to begin in October and will last for 6 weeks. The documents will be available to view on the Council's website and at local libraries.

7.3. The SPD and SA will also be subject to consultation with statutory consultees. Under the requirements of the SEA Directive, copies will be submitted to four consultation bodies in addition to CABE:

- Countryside Agency
- English Heritage
- English Nature
- Environment Agency

8. Monitoring & Implementation

- 8.1. To evaluate the implementation of the Small and Medium Housing Sites SPD it will need to be reviewed periodically against the baseline to measure any positive or negative effects. Table 11 outlines the range of indicators which will be used to measure the effectiveness of the SPD.

Table 11: Monitoring and Implementation Indicators	
SEA/SA Objectives	Indicators
1) To promote sustainable waste management, including reducing waste and waste disposal, promoting recovery, reuse and recycling.	<ul style="list-style-type: none"> ▪ Total waste arising to land fill (tonnes p/a) ▪ Waste recycled (%)
2) To make the most efficient use of land and to reduce contamination and safeguard soil quantity and quality.	<ul style="list-style-type: none"> ▪ Number of derelict sites ▪ Proportion of housing development taking place on previously developed land (%)
3) Reduce air and noise pollution, including greenhouse gases, and ensure air quality improves.	<ul style="list-style-type: none"> ▪ Air quality (Average Nitrogen Oxide Concentrations)
4) Minimise congestion and pollution by reducing the need to travel, encourage alternatives to the car and making best use of existing transport infrastructure.	<ul style="list-style-type: none"> ▪ Air quality (Average Nitrogen Oxide Concentrations) ▪ Modal split of people travelling into Richmond Town Centre ▪ Method of travelling to work for all residents in the Borough ▪ Cycle ways (total km)
5) To maintain or where possible improve water quality, conserve water and reduce the risk of and from flooding.	<ul style="list-style-type: none"> ▪ Water quality ▪ Number of planning applications granted in the flood plain
6) To promote sustainable energy use through reduced energy use, improved energy efficiency and increased use of renewable energy.	<ul style="list-style-type: none"> ▪ New build homes meeting EcoHomes Very Good standard (%) ▪ Commercial buildings meeting BREEAM Very Good standard (%) ▪ Renewable energy capacity (%)
7) Conserve and enhance biodiversity avoiding irreversible losses, through responsible management of key wildlife sites, connecting and other areas.	<ul style="list-style-type: none"> ▪ Sites of Nature Conservation Importance with good general ecological information (%) ▪ Condition and extent of Biodiversity Action Plans (BAPs)

Table 11: Monitoring and Implementation Indicators

SEA/SA Objectives	Indicators
<p>8) Promote high quality places, spaces and buildings & conserve and enhance the landscape and townscape character of the borough including historical features for the benefit of both residents and visitors.</p>	<ul style="list-style-type: none"> ▪ Conservation Areas (total number) ▪ Qualitative information on Conservation Area Appraisals ▪ Listed Buildings (total number) ▪ Listed Buildings 'at risk' (total number) ▪ Number of applications refused on design grounds, won on appeal
<p>9) To make best use of previously developed land and existing buildings, encouraging sustainable construction practices.</p>	<ul style="list-style-type: none"> ▪ Amount of derelict land and buildings ▪ Proportion of housing development taking place on previously developed land (%)
<p>10) To provide new housing opportunities and sufficient affordable housing that meets local needs.</p>	<ul style="list-style-type: none"> ▪ New build homes meeting EcoHomes Very Good standard (%) ▪ Housing completions (PA) ▪ Percentage of new housing which is affordable ▪ Percentage of new housing units which are 'small'
<p>11) To create and maintain safer, more secure and more cohesive communities.</p>	<ul style="list-style-type: none"> ▪ Total reported crimes (number per thousand residents per annum) ▪ Burglary of dwellings (offences per 1000 pop) ▪ Theft of motor vehicle (offences per 1000 pop) ▪ Theft from motor vehicle (offences per 1000 pop) ▪ Reductions in accidents and casualties (Killed and seriously injured)
<p>12) To facilitate the improved health and well being of the population, including enabling people to stay independent and ensuring access to those health, education, sport, leisure and recreation facilities and services that are required.</p>	<ul style="list-style-type: none"> ▪ Indices of deprivation (Employment, Income) ▪ General Health: Good (%) ▪ General Health: Not Good (%) ▪ Households with one or more person with limiting long term illness (%) ▪ Data on the quality of open space within the Borough ▪ Maintenance of cycle and pedestrian routes ▪ Community facilities ▪ Wheelchair standards

Table 11: Monitoring and Implementation Indicators

13) To increase the vitality and viability of existing town centres, local centres and parades.	N/A
14) To promote and encourage a buoyant and diverse economy that will provide sustainable economic growth.	N/A
15) Provide appropriate commercial development opportunities to meet the needs of the local and sub-regional economy.	N/A