



Local Development Framework

Sustainability Appraisal Scoping Report

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Contents	Page No
1.0 Introduction.....	1
1.1 The concept of sustainable development.....	1
1.2 Sustainability appraisal and strategic environmental assessment.....	1
1.3 What does the sustainability process achieve?.....	1
1.4 What is the process of sustainability?.....	2
2.0 The Local Development Framework – Vision and objectives.....	3
2.1 The vision of the Borough.....	3
3.0 Plans and programs influencing the Local Development Framework.....	5
4.0 The baseline – the quality of life in the Borough today and predictions.....	7
for the future	
4.1 An introduction to Epsom & Ewell.....	7
4.1.1 Population.....	8
4.1.2 Economy.....	9
4.1.3 Housing.....	9
4.1.4 Social inclusion and deprivation.....	10
4.1.5 Community safety.....	10
4.1.6 Health.....	10
4.1.7 Education.....	11
4.1.8 Culture and leisure.....	11
4.1.9 Transport.....	11
4.1.10 The environment.....	11
4.1.11 Landscape and biodiversity.....	12
4.1.12 Pollution.....	12
4.1.13 Resource use / Waste recycling.....	12
4.1.14 Climate change.....	13
5.0 Sustainability constraints and issues affecting the Borough of Epsom.....	14
& Ewell	
5.1 Living within environmental limits.....	14
5.1.1 Protecting the biodiversity of the Borough.....	14
5.1.2 Waste minimisation.....	14
5.1.3 Water quality.....	15
5.2 Achieving a sustainable economy.....	15
5.2.1 Maintenance of the overall strong economy of the area.....	15
5.2.2 Ensuring a vibrant economy.....	15
5.3 Ensuring a strong, healthy and just society.....	15
5.3.1 Housing provision.....	15
5.3.2 Access to healthcare.....	16
5.3.3 Provision of leisure and recreation facilities.....	16
5.3.4 Access to education.....	16
5.4 Promoting good governance.....	17
5.4.1 Provision of accessible transport.....	17
5.4.2 Protecting the landscape character of the Borough.....	17
5.5 Using sound science responsibly.....	17
5.5.1 Climate change.....	17
5.5.2 Energy efficiency.....	17
6.0 Sustainability objectives and indicators.....	19
7.0 Identification of different Local Development Framework options.....	20
Appendix 1 Stages, decisions and outputs of sustainability appraisal.....	21
Appendix 2 Sustainability appraisal of the plan objectives.....	23

Appendix 3 Plans and programs influencing the Local Development Framework..... 26
Appendix 4 Specimen PPP review document..... 28
Appendix 5 Sustainability objectives and indication..... 30

1.0 Introduction

1.1 The concept of sustainable development

Sustainable Development is a term that has been commonly used since the Earth Summit at Rio de Janeiro in 1992. The aim is to balance economic progress with social and environmental needs, and not taking resources that future generations may need to survive. The Government has produced 'Securing the Future, the UK's Sustainable Development Strategy' (2005), which identifies five guiding principles of sustainability:

- Living within environmental limits
- Achieving a sustainable economy
- Ensuring a strong, healthy and just society
- Promoting good governance
- Using sound science responsibly

1.2 Sustainability appraisal and strategic environmental assessment

There is now an international commitment to achieving Sustainable Development, and this has been incorporated into laws, guidance and advice. One of the means by which Sustainable Development can be achieved is through the land-use planning process. In line with the new planning legislation, Local Development Frameworks are to be produced which contain plans, policies and guidance in relation to the type of development which can take place in an area. These plans and policies can help to achieve Sustainable Development as they aim to ensure that development meets the needs of people living and working in an area, whilst the same time ensuring that it is sited in such a way as to protect the environment.

As economic, social and environmental needs are often conflicting, it can sometimes be hard to reconcile all these issues. In response, the government has set out a requirement for a 'Sustainability Appraisal' of emerging Local Development Framework documents to be undertaken, to ensure that this balance of issues is achieved as far as possible.

In addition to the Government's requirement for a Sustainability Appraisal (SA), recent European Legislation also requires that an assessment of the environmental effects of certain plans and policies (including planning documents) is undertaken. There is a large amount of overlap between the European 'Strategic Environmental Assessment (SEA)' and the UK 'Sustainability Appraisal' (SA) process, and they have therefore been combined into one process for the assessment of the emerging Epsom and Ewell Borough Council's Local Development Framework. For ease of reference this document will refer to both processes as a Sustainability Appraisal.

1.3 What does the sustainability process achieve?

By undertaking a Sustainability Appraisal, it is possible to look at the range of policies and plans contained in the Local Development Framework documents, and examine how they contribute to the aim of sustainable development. By looking at every

policy in this manner it is possible to identify areas where policies may not contribute to Sustainable Development. By identifying these problems at an early stage, it is possible to change and amend policies to ensure that they are as sustainable as possible.

1.4 What is the process of sustainability appraisal?

The process of a Sustainability Appraisal requires an examination of the state of the Borough as it is today and how it may change in the future, together with an identification of the key issues that could affect the sustainability of the area. Using this information, it is possible to develop sustainability objectives and indicators against which Local Development Framework policies can be measured to decide how they contribute to Sustainable Development, and enable appropriate amendments to be made to policies. The objectives and indicators also enable the success of the plan to be tested once the plan is adopted.

There are several documents that will be contained within the Epsom and Ewell Local Development Framework. At this stage the Sustainability Appraisal will focus on the Core Strategy Document (which is expected to include matters such as: Affordable Housing, Employment, Open Spaces, Transport, Anti-Social Behaviour, Community Facilities and Housing Site Allocations) for the Local Development Framework and the results will be published in a 'Sustainability Report' at the same time as the Local Development Framework preferred options. Other documents within the Local Development Framework may also require a Sustainability Appraisal. Sustainability Reports will be published with each preparation stage of the Local Development Framework documents, as set out in Appendix 1.

The Scoping Document is the first step in undertaking a Sustainability Appraisal of the Local Development Framework. It sets out the baseline information that has been collected so far, as well as the draft objectives and indicators and proposals as to how the Appraisal of the Local Development Framework policies will be undertaken.

2.0 The Local Development Framework – vision and objectives

Before undertaking a Sustainability Appraisal of the Local Development Framework, it is useful to understand the aims and visions of the Framework itself, and the context in which it is being processed. This chapter provides a brief summary of the aims and objectives of the plan. More detail is provided in the Local Development Framework 'Issues and Options consultation', which this document accompanies.

2.1 The vision of the Borough

The Local Development Framework considers the spatial aspects of the Community Strategy and is concerned to ensure that the vision for the Borough, as expressed in the Community Strategy, is able to guide the development and use of land in the Borough. The Community Strategy aims to improve the quality of life for those who live and work in the Borough by balancing environmental, social and economic factors. The vision proposes two overarching themes:

- Opportunity for all
- A society that recognises the needs of future generations.

And the following elements:

- A caring society and a thriving economic community.
- A protected and improved environment.
- A safe society.
- A healthy society.
- A harmonious and inclusive society.

Further guidance on the Councils vision and objectives for the Borough is contained in the Corporate Plan 2003-2007. This sets out the Councils ambitions and priorities for the years between 2003-2007. The plan then sets out a strategy for mobilising key resource areas to help achieve the objectives of the plan.

The key priorities to which the plan relates were agreed by the Council in September 2003. These are as follows:-

- To reduce anti-social behaviour and fear of crime
- To improve the visual appearance of the local environment
- To improve services for young people
- To secure additional key worker, social and affordable housing
- To secure improved transport facilities for particular sections of the community
- To cut bureaucracy and improve cost-effectiveness

These priorities have been combined with the vision expressed in the Community Strategy and the issues emerging from the base line analysis in part four of this report, to produce the following six themes:-

1. Meeting housing needs of the local population on previously developed land in accessible locations wherever possible.
2. Improving accessibility through choice of transport modes, especially non-motorised transport.
3. Enhancement of the attractiveness of the built environment, by high quality design, and enhancement of the quality of the natural environment and habitats, through management and nature conservation.
4. Providing accessible and high quality community facilities, including retail, education, leisure and recreation.
5. Supporting the local economy by encouraging development for employment on previously developed land in accessible locations wherever possible.
6. Encouraging sustainable development, especially energy efficiency and conservation, the prudent use of natural resources and the safe disposal of waste.

The six themes have been made the subject of an initial sustainability appraisal and public consultation. Their current format reflects the results of these two exercises. It is proposed to adopt these six themes as the overarching objectives for the Local Development Framework i.e. the Plan Objectives.

3.0 Plans and programs influencing the Local Development Framework

The Local Development Framework is not being prepared in isolation. The policies and plans that it will contain will be developed by following guidance from the Government and Surrey County Council, as well as reflecting local needs and requirements, for example those which have been identified as a result of preparing the Community Strategy, reflecting the different needs and aspirations of local communities.

Appendix 3 lists international, national, regional and local plans and strategies that will influence the policies and strategies in the Local Development Framework. Each of these plans is then summarised in a standard template, an example of which is attached as Appendix 4. The analysis process will also attempt to identify where there may be areas of conflict between different plans and strategies affecting different elements of the Local Development Framework. A brief summary of this is however set out below in the following paragraphs.

There are different levels of plans and strategies that affect the Local Development Framework. At a national level, Planning Policy Guidance notes and their successors, Planning Policy Statements set out the Government's strategy for development on a wide range of issues, including Housing, Economy, Transport and Environment. Areas of particular importance to the Epsom and Ewell Local Development Framework that are contained in the Planning Policy Guidance and Planning Policy Statements include:

- the re-use of previously developed land and development within urban areas before considering the release of Greenfield sites;
- reducing reliance of the use of the car;
- ensuring that retail development is in town centres in preference to edge of town locations;
- preserving and enhancing the historic character of the area;
- the need to protect the character of the countryside.

The Government has also prepared Regional Planning Guidance 9 which sets out the overarching framework for the preparation of development plans in the South-East. In addition to setting out policies that provide a regional dimension to the National Planning Policies, it sets the housing requirement for Surrey for the period until 2016. In addition to the Regional Planning Guidance, some more detailed Regional Policy Documents have been published in relation to Transport and Renewable Energy. Guidance has also been produced at a regional level regarding undertaking Urban Housing Potential and Housing Needs Surveys.

The main strategy which will influence the development of the Local Development Framework at the regional level is the South East Plan. The policies within this document will shape the future physically and environmentally, and influence it economically and socially. Other relevant documents include the County Waste and Minerals Plan and the Local Transport Plan.

The most significant strategy at local level is the Community Strategy. This was produced in 2003 by a Local Strategic Partnership of about twenty different groups representing a variety of interests in the community from the statutory, business and voluntary sectors. The Strategy sets out a vision for the Borough up until 2015 – 2018 and proposes a series of shorter term actions to achieve this. As discussed in Section 2.0 above, the Local Development Framework is concerned with the spatial elements of the Community Strategy and is a key mechanism for the delivery of the vision and objectives of the Community Strategy overall.

As a result of the different plans and strategies, which feed in to the Local Development Framework, there are different and sometimes conflicting challenges and requirements that the Council must try to address. An example of conflicting plans is the need for housing that has been specified by RPG9 and Surrey Structure Plan (though will be allocated in the South East Plan in due course) and PPG13 on reduction of car use and congestion. The Council cannot affect the overall number of houses that must be accommodated, or the broad area of the strategic locations, but it can work with local communities to ensure that the housing meets local needs as far as is possible, and seeks to situate new housing in sustainable locations to limit the need to travel.

The need for housing to be accommodated as far as possible on previously developed land is another potential source of conflict. The development of all previously developed land for housing has the potential to dramatically alter the character of the area and may result in the loss of employment land already in towns.

4.0 The baseline – the quality of life in the Borough today and predictions for the future

Before an assessment is undertaken to determine how well each of the policies in the Local Development Framework contributes to Sustainable Development, it is necessary to have an understanding of the state of the Borough from present trends which would be updated annually. A characterisation of the area study has been produced for this purpose that considers the following areas:

- Population and Social profile
- Housing
- Economy and Employment
- Transport
- Community Safety
- Health
- Open space and Leisure

This 'baseline' information about the Borough can be used to help identify sustainability issues affecting the Borough, and from this it is possible to devise 'Sustainability Objectives' against which plans and policies in the Local Development Framework can be tested to examine how they contribute to sustainable development.

The characterisation of the area study has been prepared as a free-standing document; however, some of the aspects that it considers are précised below for guidance on the source from which the sustainability objectives have been devised.

4.1 An introduction to the Borough of Epsom & Ewell

Epsom and Ewell Borough is located in the north east of Surrey. The Borough is based on the market town of Epsom, the ancient village of Ewell and the 1930s centre at Stoneleigh. It is the smallest district in Surrey in both population (67,700) and size (3,411 hectares).

The Borough has the smallest geographical area in the County but is the most densely populated Borough. Despite this, over half the Borough comprises of open space, most of it Green Belt, running around the built up area and stretching southwards to the North Downs.

Epsom town centre ranks as a major shopping centre in Surrey but has to compete with nearby larger centres to the north. In addition to shops and office employment located mainly in Epsom, the Borough has two business parks. It has a racehorse training industry and is famous for the annual Derby. Until recently, it also had the largest cluster of psychiatric hospitals in the country, the sites of which have been or are to be redeveloped for housing with some retained health care.

The area has full employment with a similar number of workers commuting in and out of the Borough each day. This is facilitated by good rail and road link to London and the rest of Surrey. Most people are employed in managerial, professional or non-manual jobs. Educational attainment is high compared with the rest of the country.

The Borough is relatively affluent, ranking within the top 15% of the wealthiest authorities in the Country. However, two wards (Ruxley and Court) fall within the ten most deprived wards in Surrey, a disadvantage that is perhaps more marked because of their privileged neighbours.

The population is older than average for the country and this is reflected in the number of services provided for the elderly. At 8.7% (from 2001 census) the Borough has the highest percentage black and minority ethnic population in Surrey.

Some key facts about the Borough are set out below.

4.1.1 Population

It is important to know the current and future levels of the population of the Borough as it underpins many of the aspects of life in Epsom and Ewell Borough, including the economy, housing requirements, pressure on the countryside.

By population, Epsom and Ewell is the smallest Borough within Surrey and is the only Borough whose population has fallen over the past 10 years. Since 1971, the population of Epsom & Ewell has been declining, though the population of the county as a whole has risen. The population of England as a whole has also risen during this period (by 2.6% from 1991 to 2001), though the growth rate has slowed.

The decrease in population can partly be attributed to the demise of the psychiatric hospitals in the Borough. Long Grove, Manor and Horton Hospitals all closed between 1991 and 2001. In 1991 there were 2,441 residents in psychiatric care; in 2001 this had fallen to just 136.

At the time of the Census in 2001, the population of the Borough was 67,059 (Office for National Statistics [ONS]). The projected population of the Borough is likely to be around 75,700 by 2010.

The biggest falls in population have come in the 15-24 and the 75-84 age bands. The biggest rise in population has come in the 85+ group. The population is however an aging one, which in future years is likely to create additional social care needs.

4.1.2 Economy

More than 25,000 people are employed in the Borough, and over 85% of them work in the service sector particularly in retailing, the professional services and the social and public services. Over 60% of the residential work force travel outside the Borough to work.

Unemployment in the Borough has gone down over the past 10 years. In 1991 3.0% of people were unemployed; in 2001 this had gone down to 1.8%. 25 per cent of those unemployed were aged 50 and over.

The Borough has practically full employment with a ratio of Unemployed People: Job Vacancies of 1.02:1.00. Educational attainment is high compared with the rest of the country.

Both Epsom & Ewell and Surrey have a higher proportion of residents who are self-employed than the English average.

Epsom town centre is the main centre for employment in the Borough. There is approximately 113,570sq.metres of office space in the town centre, of which some 75% has been constructed within the last 30 years. Industrial land in the Borough is mainly located within two employment areas, at Longmead and Nonsuch. Together these cover an area of 20.8ha. which provides 67,000 sq. metres of floor space, most of which comprises of small units.

4.1.3 Housing

The population of the Borough peaked at 72,301 in 1971 and by the 1991 census had decreased to 67,007 and now according to the mid-year estimates for 2003 has increased to 67,700.

However, over the same period, the number of dwellings increased from 23,676 to 26,358 (approximately 4% increase) and the number of households from 23,008 to 25,662 (approximately 3% increase). In 2000, it was estimated that the dwelling stock further increased to a total of 27,460.

The Borough has the highest proportion of owner occupied properties (either owned outright or owned with a mortgage or loan) in Surrey (82.8% in the Borough of Epsom & Ewell, 77.9% in Surrey County as a whole). The Borough also has the lowest proportion of social housing (Local Authority or Housing Association) in the County (7.9%, compared to the County average of 11.6%).

The high cost of housing in the Borough has made it difficult for many people to buy and rent homes. In spring 2003, a single person wanting to buy an average flat in the Borough would have to pay about £173,691. With a 90% mortgage based on three times income, that person would have needed to earn £57,897 per annum.

It is estimated that 518 affordable units are required per annum (395 more than existing supply from re-lets). In 2001, 70 units of affordable housing were added to the stock.

4.1.4 Social Inclusion and Deprivation

The overall measure of deprivation in a community is calculated by scoring a wide range of issues from access to childcare and open space, to overall levels of income. The overall score provides an indication of how deprived an area is.

The precise type and level of the deprivation is often very hard to measure, and data is often not available. Ways to locate measure and resolve deprivation need to be found over the coming years.

The Borough is relatively affluent, ranking within the top 15% of wealthiest authorities in the Country.

Generally, Epsom and Ewell has very low levels of deprivation when compared against national standards, with all wards being above the average level of deprivation (Index of Deprivations, ONS, 2000).

Despite very low levels of deprivation in the Borough, there are two wards (Ruxley and Court) which fall in the ten most deprived wards in Surrey.

4.1.5 Community Safety

The Borough is generally a very safe place to live. All the various crime types in the Borough are well below the national average and, indeed, well below the average for the South Eastern region and Surrey. Between 2000 and 2001 the reported crime rate per 1000 population was 61.69 and Surrey had an average of 58.7 crimes per 1000 population.

Although the level of crime in the Borough is very low, fear of crime is still an issue. According to the Borough's Crime and Disorder Audit 2004; violent crimes have increased by 12%, theft of motor vehicle increased by 24% and criminal damage has increased by 39.7%. Three of the major trouble spots in the Borough are Court, Ruxley and Town wards.

It is difficult to predict future levels of crime in the Borough, although it is of course hoped that they will fall. Planning has a role to play in ensuring that crime levels remain low, for example, by ensuring the design and layout of new developments does not encourage crime, and by providing youth facilities which may perhaps reduce the occurrence of antisocial behaviour.

4.1.6 Health

The Borough of Epsom and Ewell is generally a healthy place to live. According to the 2001 Census, only 6% of the population rated the health-care in the Borough as 'Not good'.

Over 73% of the Borough has good health. 14% of the population of Epsom and Ewell Borough have 'limited long-term illness' which is slightly higher than the County average of 13.5% but lower than the national average of 18.2%. Life expectancy for male is 77.9 yrs and 83.6 for female.

4.1.7 Education

The standard of secondary and further education in the Borough is high. However, there is a number of long-term unemployed and there is a need to constantly upgrade skills to meet employers' need. The Borough has a total of 5 secondary, 3 independent and 21 primary and junior schools. There is a college of further and higher education (NESCOT), the Surrey Institute of Art & Design University College, which has a campus in Epsom, and the Laine Theatre Arts school.

4.1.8 Culture and leisure

Leisure activities are by their very nature wide ranging. They can be informal, for example reading a book, or more organised, such as football matches or flower arranging classes. All leisure activities contribute to quality of life and can have an impact on other aspects of life such as physical wellbeing.

The Borough has the highest percentage of public open space (28 various playgrounds and country sites) among the Districts/Boroughs in England and Wales. The Borough hosts the Derby every year in June. This leads to a large influx of visitors to Epsom during this period.

4.1.9 Transport

Driving is the most popular way for residents of Epsom & Ewell to get to work. Generally the Borough has good transport links. The Borough has good train services in and out of London and direct links with other centres such as Guildford and Sutton. However, there are no direct train links with other centres such as Reigate and Kingston. The bus services to and from the Watersedge Estate (Ruxley Ward) and Longmead Estate (Court Ward) are poor. There are no bus services to and from these areas in the evenings. There are also limited week-end bus services. Car ownership in the Borough is high generally; however in Court ward, 25% of the populations do not own a car.

4.1.10 The Environment

Environmental information covers issues such as landscape, nature conservation and pollution. It can be hard to collect within administrative boundaries; wildlife for example moves from place to place.

Data also tends to be gathered at certain points rather than collected across a whole area. For example, air quality is measured from specific locations, whereas in the case of employment figures they are collected for wards and towns.

4.1.11 Landscape and Biodiversity

Epsom & Ewell Borough Council is proud of its tree lined streets, parks & open spaces. The borough aims to maintain and to continually enhance the leafy, rural appeal of the borough for the enjoyment of residents and visitors, and for those of the future years to come. There are over six thousand trees planted in the borough's streets alone, and many tens of thousands of trees in its parks, commons and open spaces.

About half of the Borough comprises open space- much of it Green Belt. Only one farm remains in the Borough, though there are a number of racehorse training establishments. There are 1,500 acres of open space owned by the Borough Council.

It is also hoped that adverse effects on landscape and biodiversity can be limited by increasing the amount of development on brownfield land. There is a national target of 60% of new housing development to be located on previously developed land and this coupled with an increase in the density of development helps to reduce the pressure on greenfield sites, which may well have a high landscape and biodiversity value. However, there have been instances where brownfield sites are home to important plant and animal species.

4.1.12 Pollution

Pollution is a wide ranging topic, covering issues such as air pollution, river and watercourse pollution, noise pollution and land and groundwater contamination. In general, pollution levels in the Borough are low. The quality of the air we breathe is influenced by a great number of air pollutants, which are emitted from a wide range of sources. It is the aim of the Borough Council to ensure that the air we breathe is of such a quality that it does not adversely affect the health of the residents of the Borough. There is, however, the potential for the air quality of the Borough to decline in future years, particularly if the amount of traffic continues to rise, or potentially from further development of Gatwick Airport.

Epsom & Ewell Borough Council is investigating all previous land uses which may have contaminants that may cause harm to human health. This commences with a desktop study which will establish whether site investigations and remediation works have occurred on the site. Only if there is inadequate information to determine whether the site is "contaminated land" or "uncontaminated land" by statutory definition, will the investigation proceed to the next phase. However, as no investigations are completed to date, no land in the Borough has yet to be defined as "contaminated land" or "uncontaminated land" by statutory definition.

4.1.13 Resource Use / Waste and Recycling

The Borough's weekly 'kerbside' recycling service collects various materials for recycling. There are four bespoke recycling vehicles providing a weekly service across the whole Borough. Before the kerbside recycling service was launched an average of only about 9% of the household rubbish was generated, now recycling is over 15%.

Although the amount of waste being recycled is increasing, there is always a certain amount of waste that has to be disposed of permanently. Most of this waste currently goes to landfill sites but alternatives to this will have to be found in the future, as the number of available landfill sites is decreasing.

4.1.14 Climate Change

Climate change is an issue which has the potential to affect the economic, social and environmental aspects of life in Epsom and Ewell. Although the precise nature of the changes that are likely to occur to the environment as a result of climate change is not fully understood; it is currently thought that summers in the UK are likely to become longer, warmer and drier, whilst winters will become shorter and wetter. This may lead to drought and to increased flooding events. Current predictions are that average annual temperatures are likely to rise between 1.3 and 3.4 degrees although the degree that the climate will change depends on how much levels of greenhouse gases, such as carbon dioxide and methane, are reduced from current emission levels.

Effects of global warming are difficult to predict, but changes could affect the landscape as different crops may have to be grown to cope with the new climatic conditions. Habitats may also change; ponds could dry out, or species that prefer a cooler climate may be forced further north. Where possible, it will be necessary to create measures to provide for biodiversity as climate changes. Climate change may also have an impact on the economy as increased flooding and extreme weather events may have implications as to where businesses are able to locate and will also affect the goods and services that are required.

Climate change is also likely to have an effect on social issues. For example, leisure activities may change with people spending more time out of doors in summer. This could perhaps lead to increased problems in terms of noise impact on neighbours. Climate change could also affect health, with more episodes of heat stroke. Concern has also been raised by some that a warmer climate could mean diseases from warmer climates may reach the United Kingdom.

As climate change is now to a certain extent inevitable, future development will need to adapt to a changed climate, as well as incorporating measures to ensure that the amount of greenhouse gases that are produced are reduced.

Buildings will need to be built to withstand warmer summers and more severe weather events. To ensure the reduction in the amount of greenhouse gases produced, measures such as; better energy efficiency measures, reduced travel and energy generated from renewable sources are required.

5.0 Sustainability constraints and issues affecting the Borough of Epsom and Ewell

There are certain key sustainability issues which are central to the Local Development Framework. This section sets out those which have been determined to date, although they will be updated as a result of further consultation as work on the Local Development Framework progresses. The identification of the key sustainability issues is important as these are the areas that the Sustainability Appraisal will need to address.

The key sustainability issues have been derived from merging information from various sources. This includes the Baseline Data, and the plans and policies affecting the Local Development Framework, as well as preliminary consultation with key organisations such as the Environment Agency and Surrey County Council.

The key issues are set out in more detail in the following paragraphs. The issues have been grouped under the Government's four key strands of sustainable development, first promoted in its Strategy for Sustainable Development, a Better Quality of Life (May 1999). It should be noted that some of the issues are cross cutting in nature and could be placed under more than one category, but for ease of discussion have been placed under one section only.

5.1 Living within environmental limits

5.1.1 Protecting the Biodiversity of the Borough

The Borough contains a wide range of biodiversity (the variety of life form), which helps to contribute to the quality of life in the area. Some of this biodiversity has been designated as being of international, national or local importance. Biodiversity is threatened by a range of factors, including changing agricultural practices and land management, climate change and also development.

The Local Development Framework has relatively little influence on issues such as land management, but will need to ensure that biodiversity is not adversely affected by development, both through the careful siting of development and enabling measures to enhance biodiversity in other areas.

5.1.2 Waste minimisation

Whilst recycling rates in the Borough have increased, Government and EU targets will lead to further increases. At the moment, significant amounts of locally generated waste have to be transported for disposal at landfill sites which are now becoming scarce. This directly impacts on transport infrastructure, air quality, groundwater quality and soil quality. Indirectly, it places pressure on Green Belt land and communities where disposal sites are often located and encourages fly-tipping.

The Local Development Framework will need to encourage waste minimisation in order to minimise the many potentially adverse impacts of a continued reliance on

landfill as a means of waste disposal whilst recognising that arrangements will still need to be made for the sustainable disposal of the remainder.

5.1.3 Water quality

Water usage in the area remains consistently high whilst rainfall levels and distribution have become increasingly erratic. Enforced restrictions on water supply are historically rare but are likely to become a more frequent occurrence. At the same time, the new flood plain maps released by the Environment Agency in 2004 indicate that the risk of flooding in the Borough, with all the attendant adverse effects on water quality and disruption to daily life, may have been significantly underestimated in the past.

The growing number of households in the Borough also places extra demand on water supply and sewage infrastructure, while water quality standards are getting tighter presenting a key challenge to the region.

Development in the Borough will need to ensure that efficient use is made of water and that sustainable drainage arrangements are provided to safeguard the quality of the water environment. Development will also need to ensure that the integrity of flood plains is not compromised.

5.2 Achieving a sustainable economy

5.2.1 Maintenance of the overall strong economy of the area

At the current time the economy of the Borough is generally good with low unemployment levels, and it needs to be ensured that this can be maintained into the future.

The Local Development Framework therefore needs to ensure that there is continued protection of existing employment sites and there is provision of new sites as well.

5.2.2 Ensuring a vibrant economy

Epsom town centre is one of the more important town centres in Surrey and is the main centre in the Borough. The Local Development Framework will need to ensure that there is a targeted approach to help shape the future of Epsom town centre by improving its vitality and viability.

5.3 Ensuring a strong, healthy and just society

5.3.1 Housing provision

The provision of housing is one of the most important issues affecting the Borough. House prices in the Borough are high and are continuing to rise which can make it difficult for people to afford to buy houses. In addition to difficulties with the private housing market, there is also a shortage of affordable (rented / part owned) houses in the Borough.

There is also a requirement for new housing development in the area, both to meet local needs and also to meet the government's housing requirements in the area. There is an emphasis on providing this development on previously developed land before Greenfield sites are developed. If densities on Brownfield sites are increased, it reduces the pressure on developing Greenfield land.

The Local Development Framework needs to ensure that the requirement for more housing numbers helps to provide sufficient affordable homes for all sections of the community. The location of the development sites will also be important; in addition to being situated on previously developed land where possible, they should be situated so as to be accessible to employment, facilities and transport.

5.3.2 Access to health care

At the current time the general health of the Borough's population is good, with high life expectancy. The main issue of concern to people in the community is access to services. The recent announcement of a new critical care hospital on the site of Sutton Hospital and land adjacent to the Royal Marsden Hospital at Sutton has done little to alleviate this concern. Also, the future of Epsom General Hospital remains uncertain. This also raises the issue of providing for carers as the Borough has an older population.

The Local Development Framework therefore needs to ensure that enough health care facilities are provided as part of new development.

5.3.3 Provision of leisure and recreation facilities

Leisure and recreation facilities in the Borough are generally good and include facilities and events that are of international renown, such as the annual Epsom Derby horse race. The Local Development Framework will need to ensure that there is sufficient provision of leisure facilities and opportunities as part of new housing development and ensure there are policies which will facilitate the protection and provision of leisure, recreation and tourism facilities in areas where they may be required for local, regional, national and international needs.

5.3.4 Access to education

The population of the Borough of Epsom and Ewell is generally well educated, with a well qualified workforce and most school leavers entering further or higher education of some kind. However, there is need to constantly upgrade skills to meet employers' need. There are shortages in financial services, managerial positions, care sectors and all level of construction. This is affecting the performance of many employers.

The Local Development Framework will need to ensure that sufficient educational facilities are required and are as accessible as possible to the potential users to help realise opportunities in employment and improve quality of life.

5.4 Promoting good governance

5.4.1 Provision of accessible transport

The Borough has very high levels of car ownership. The need for travel by car is at the current time exacerbated due to the lack of sufficient public transport and the high percentage of wealthy people in the Borough.

Car use is also potentially damaging to the environment including poor air quality, noise and so on. Pollution from cars can also have an impact on the wider environment beyond the Borough. Residents are also very concerned about the levels of congestion in the Borough, identifying it as one of the highest priorities.

The Local Development Framework therefore needs to consider transport as an integral part of the plan, whereby, the use of private car would be reduced through the integration of sufficient modes of transport. This would enable the public to travel easily and to reach their destination on clean, safe, reliable public transport.

5.4.2 Protecting the Landscape Character of the Borough

The Local Development Framework needs to ensure that development in the Borough that is needed to help maintain economic and social needs does not adversely affect the character of the countryside or townscapes in the Borough.

5.5 Using sound science responsibility

5.5.1 Climate Change

Climate change is one of the key sustainability issues, which face the Borough. The economy, society and the environment will all be affected, but in turn activities in the Borough are contributing to this change in the first place.

Development in the Borough therefore needs to be constructed in such a way as to withstand some of the effects that may arise from climate change, such as increased intensity, frequency of flooding, and hot dry summers. Development will also need to ensure that it reduces the amount of greenhouse gases that are emitted to ensure that the effects of climate change are as small as possible.

5.5.2 Energy efficiency

Most of the energy produced in the Borough comes from the burning of fossil fuels which release 'Greenhouse gases', such as carbon dioxide, into the atmosphere. Greenhouse gases are widely considered to be a major contributor to climate change. The impact of climate change and the link to the Local Development Framework have already been considered in this report. However, energy efficiency is also important as low income households often struggle to meet energy costs from their limited income. This can have an adverse impact on their health and well-being.

The Local Development Framework will need to encourage the efficient use of energy and the production of sustainable energy in both businesses and homes particularly in new developments.

6.0 Sustainability objectives and indicators

The aim of the Local Development Framework is to improve the sustainability of the Borough and undertaking a Sustainability Appraisal is a means of achieving this. In sustainability terms, Objectives and Indicators have been identified help assess the sustainability of the policies in the Local Development Framework, and to monitor the success of the plan.

A set of sustainability objectives have therefore been devised which aim to ensure that the sustainability of the Borough is improved. These have been based on the sustainability issues affecting the Borough, as identified in the previous chapter. The objectives have also been subject to comments as part of a preliminary consultation with other Council departments and statutory organisations.

In addition to the objectives, a set of indicators have been set out which will enable the effects of the plan on sustainability to be measured. For each objective, one or more indicators have been set that provide for the status of the objective to be tested, now or in the future. Some of the objectives are closely related, for this reason some indicators have not been set out under just one objective. The indicators are primarily related to planning matters rather than wider issues as it is not easy to measure how much of an effect planning can have on some matters. For example whilst planning policies can help the location and development of leisure services, a measure of visitor numbers would not be a direct indication of how successful such a policy has been, as visitor numbers are also likely to be affected by other effects ranging from the type of attraction, the cost of entry and even the weather!

The objectives and indicators are set out in Appendix 5.

7.0 Identification of different Local Development Framework Options

There is not necessarily one single way of meeting the needs of people who live and work in the Borough. Some of the different options may be more suitable than others, and in order to ensure that the Local Development Framework contributes to sustainable development as far as possible different options need to be assessed.

There is more than one kind of option that can be considered in relation to Local Development Framework policies and proposals. These are as follows:

- **Discrete Alternatives:** These are alternatives which involve a choice between one option or another. One example is the decision as to whether housing should be located at one site or another.
- **Alternative Approaches:** There are potentially different methods that different issues can be approached. For example the need to reduce car journeys could be addressed by locating employment and housing close together, by helping to fund improvements to public transport, or a combination of the two.

Do nothing: In some instances it may be that it could be more suitable to leave things as they are rather than to provide development and this option may need to be considered on some occasions.

APPENDIX 1: Stages, decisions and outputs of sustainability appraisal

Planning stage	Sustainability Appraisal stage	The purpose of this stage	What to decide	What to record
Identify the issues and options and prepare for consultation	A. Setting the context and establishing the baseline Identify other relevant plans and programmes Identify environmental protection objectives, and state their relation to the plan Propose sustainability appraisal objectives. Propose indicators. Collect baseline data, including data on likely future trends Identify environmental and sustainability problems	Document how the plan is affected by outside factors; suggest ideas for how any inappropriate constraints can be addressed Focus on key environmental and sustainability issues; help to identify sustainability problems, objectives and alternatives Streamline the subsequent baseline description, prediction and monitoring stages Provide a base for effects prediction and monitoring	What other plans, programmes and environmental protection objectives influence the plan What environmental/ sustainability objectives and indicators to test the plan options and policies against What data to collect and how to structure it so it can be easily used What environmental/ sustainability problems to consider during plan-making	List of relevant plans, programmes and environmental protection objectives List of sustainability appraisal objectives and indicators Data on environmental/ sustainability baseline List of relevant environmental/ sustainability problems
Consultation on issues and options	B. Deciding the scope of Sustainability Appraisal and developing alternatives Identify alternatives Choose preferred alternatives Consult authorities with environmental responsibilities and other bodies concerned with aspects of sustainability	Clarify baseline, identify problems and alternatives Ensure that the sustainability appraisal covers key issues Help to ensure that the plan is sustainable	What alternatives to consider, possibly linked to each problem identified in Stage A What to include in the draft report	List of alternatives Results of Stages A-B
Prepare proposed plan	C. Assessing the effects of the plan Predict the effects of the plan Evaluate the plan's effects Propose measures to prevent, reduce or offset adverse environmental effects	Consider all likely effects Ensure that all relevant effects are identified and proposed mitigation measures are considered	What the effects of specific options, policies and proposals will be How any adverse effects of implementing plan policies can be avoided, reduced or offset (mitigated) The preferred alternatives How to present	Effects of the plan options, policies and proposals List of preferred alternatives and explanation of why these are preferred Proposed mitigation measures and how they will be implemented What methods have been used

Planning stage	Sustainability Appraisal stage	The purpose of this stage	What to decide	What to record
			the information	to analyse data and limitations Draft Environmental Report
Full public consultation on proposed plan	D. Consulting on the draft plan and the Environmental Report Present the results of the Sustainability Appraisal up to this point Seek inputs from the public and authorities with environmental responsibilities Take consultation results into account Show how the results of the Environmental Report were taken into account in finalising the plan	Gather more information on the baseline and problems Discover the opinions and concerns of the public on environmental// sustainability issues Show that information and opinions on environmental/ sustainability issues have been appropriately considered	Who to consult (in addition to statutory consultees) and how How to analyse to consultation results	Consultation process
Monitor plan implementation	E. Monitor the significant effects of implementing the plan on the environment Monitor plan implementation	Ensure that adverse effects can be identified Provide information for future sustainability appraisals	How to measure the actual effects of plan on the environment and sustainability Ensure that plan is well implemented and feeds into future plans or reviews	Proposed monitoring programme

Adapted from The Strategic Environmental Assessment Directive: Guidance for Planning Authorities (ODPM October 2003).

APPENDIX 2: Sustainability appraisal of the plan objectives

There are 6 plan objectives which are derived from the issues and options for the Plan, the Councils Corporate Plan and the Community Strategy.

1. Meeting housing needs of the local population.
2. Improving accessibility through choice of transport modes.
3. Enhancing the attractiveness of the built and natural environment through quality design and conservation.
4. Providing accessible and high quality community facilities, including retail, education, leisure and recreation.
5. Supporting the local economy.
6. Encouraging sustainable development, especially energy efficiency and conservation.

Objective 1: Meeting housing needs of the local population			
<p>Comments: Possible conflict with Objective B, protection of the environment, if greenfield land is used to meet local needs.</p> <p>Recommendation: Change wording to prioritise to the use of brownfield land specifically.</p>			
Objective A	Objective B	Objective C	Objective D
Social Progress	Protection of the environment	Economic growth	Prudent use of natural resources
Positive Compatible	Possible conflict	Positive compatible	Neutral

Objective 2: Improving accessibility through choice of transport modes			
<p>Comments: Possible conflict with Objective B, Protection of the Environment if use of motorised transport results elevated CO₂ emission levels locally.</p> <p>Recommendation: Change wording to prioritise sustainable non-motorised mode.</p>			
Objective A	Objective B	Objective C	Objective D
Social Progress	Protection of the environment	Economic growth	Prudent use of natural resources
Positive Compatible	Possible Conflict	Positive compatible	Neutral

Objective 3: Enhancing the attractiveness of the built and natural environment through quality design and conservation.			
No Comments			
Objective A	Objective B	Objective C	Objective D
Social Progress	Protection of the environment	Economic growth	Prudent use of natural resources
Neutral	Positive Compatible	Neutral	Positive Compatible

Objective 4: Providing accessible and high quality community facilities, including retail, education, leisure and recreation			
No Comments			
Objective A	Objective B	Objective C	Objective D
Social Progress	Protection of the environment	Economic growth	Prudent use of natural resources
Positive compatible	Positive Compatible	Positive Compatible	Neutral

Objective 5: Supporting the local economy

Comments: Possible conflict with **Objective B**, Protection of the Environment if greenfield sites in areas of poor accessibility are used to support economic development.

Recommendation: Change wording to prioritise brown field land and accessible locations.

Objective A	Objective B	Objective C	Objective D
Social Progress	Protection of the environment	Economic growth	Prudent use of natural resources
Positive compatible	Possible conflict	Positive compatible	Positive compatible

Objective 6: Encouraging sustainable development, especially energy efficiency and conservation

Comments: Possible conflict with **Objective C**, Economic Growth, if there is additional cost to industry.

Objective A	Objective B	Objective C	Objective D
Social Progress	Protection of the environment	Economic growth	Prudent use of natural resources
Neutral	Positive compatible	Possible conflict	Positive compatible

APPENDIX 3: Plans and programs influencing the Local Development Framework

INTERNATIONAL

Habitats Directive
Birds Directive
Water Framework Directive
Kyoto Protocol
UN Convention on Human Rights
Landfill Directive
Aarhus Convention 1998
EC Directive on EIA
EC Directive on Energy Performance of Buildings
Convention on Biological Diversity

NATIONAL

Ten Year Transport Plan
National Air Quality Strategy
Rural Strategy 2004
Farming and Food Strategy
UK Programme for Climate Change
National Waste Strategy 2000
Energy White Paper
National Cycling Strategy
Sustainable Development Strategy for the UK
Sustainable Communities Plan
Urban White Paper 2000, Rural White Paper 2000
Circular 6/98 Planning and Affordable Housing
Circular Planning for Gypsy and Traveller Sites (draft Dec 2004)
PPS1: Delivering Sustainable Development
PPG2: Green belts
PPG3: Housing
PPG4: Industrial, commercial development and small firms
PPS6: Planning for Town centres
PPS7: Sustainable Development in Rural Areas
PPG8: Telecommunications
PPG9: Nature conservation
PPS9: Biodiversity and Geological Conservation (draft)
PPG10: Planning and waste management
PPS10: Planning and waste management (draft)
PPS11: Regional Spatial Strategies
PPS12: Local Development Frameworks
PPG13: Transport
PPG14: Development on unstable land
PPG15: Planning and the historic environment
PPG16: Archaeology and planning
PPG17: Planning for open space, sport and recreation
PPG18: Enforcing planning control
PPG19: Outdoor advertisement control
PPG21: Tourism
PPS22: Renewable energy
PPG23: Planning and pollution control
PPG24: Planning and noise
PPG25: Development and flood risk

REGIONAL

Sustainable Communities in the South East
Regional Economic Strategy for South East England 2002 - 2012
Regional Planning Guidance for the South East (RPG9)
Strategy for Energy Efficiency and Renewable Energy
Draft Regional Waste Strategy
Regional Housing Strategy
Regional Spatial Strategy
Regional Transport Strategy (Chapter 9 of Regional Planning Guidance for the South East RPG9)
Integrated Regional Framework 2004

COUNTY

Community Strategy
Surrey Structure Plan
Surrey Local Transport Plan
Surrey Minerals Local Plan
Surrey Waste Local Plan
Surrey Cultural Strategy
Surrey Heritage Strategy
Surrey Rural Strategy
Surrey Sports Strategy
Surrey Tourism Strategy
AONB Management Plan
Surrey Economic Partnership Economic Strategy
Surrey Biodiversity Action Plan
Surrey's Medium term Strategy for Adults and Community Care
Parking Strategy for Surrey
Draft Crime and Disorder Reduction Strategy 2005-08/09
School Organisation Plan
SLGA Key Worker Strategy (Housing to Underpin Economic Success) and the Surrey Housing and Planning Officers best Practice/Guide

LOCAL

Community Strategy
Strategy for Epsom Town Centre
Borough Sustainability Strategy
Epsom and Ewell District-wide Local Plan,
Supplementary Planning Guidance - Householder Applications (Design Guide)

APPENDIX 4: Specimen PPP review document

Title: Strategy for Epsom Town Centre	
Date adopted	April 2003
Status and adoptive procedure	Adopted
Adopting body	Epsom & Ewell Borough Council
Document level	Local
Summarised by	Ransford Stewart
Summarised for	LDF generally/ Core Strategy/ Particular LDD/ other document
Key objectives relevant to LDF and SA	
<ol style="list-style-type: none"> 1. to improve the retail attractions 2. to improve the range and quality of cultural, recreational, leisure, community and visitor attractions 3. to provide more housing for all sections of the community including those in housing need 4. to retain the existing balance between employment uses and other town centre uses 5. to improve accessibility particularly by public transport 6. to enhance the public environment 	
Key targets and indicators relevant to LDF and SA:	
<ol style="list-style-type: none"> 1. annual increase in the number of visitors attracted 2. 510,000 visitors to the Ebbisham centre by April 2005 3. 360 – 380 new residential units to completed between 2002 and 2006 of which 30% are to be affordable 4. reduced car parking standards 5. circular night bus by April 2005 6. reduction of road traffic to less than 98% of the 1998 level by April 2016 	
Implications for LDF	
Cross cutting nature of the issues and objectives suggest that an area action plan will be required	
Implications for SA:	
<p>Refers to all aspects of the environmental, economic and social capital covered by the SA objectives and indicators.</p> <p>Conflicts most likely as a result of tensions between objectives to increase attractiveness of town centre and the objective to increase accessibility whilst simultaneously reducing road congestion if these are not carefully matched.</p>	

Other relevant information
None
Links
http://www.epsom-ewell.gov.uk
Comments
None

APPENDIX 5: Sustainability Objectives and Indicators

Objective	Indicator
<i>Living within environmental limits</i>	
1) To minimise the harm from flooding	<ul style="list-style-type: none"> a. Number of properties at risk from flooding b. Number of properties built with sustainable drainage installed c. Number of properties linked to sustainable drainage systems. d. Area of land identified for flood storage purposes as part of catchment flood management plan considered for future revision. e. The number of properties or households that have access to the environment agency's flood warning service.
2) To reduce land contamination and safeguard soil quality and quantity	<ul style="list-style-type: none"> a. The amount of contaminated land remediated b. Area of grade 1,2 and 3 agricultural land lost to development
3) To ensure air quality continues to improve	<ul style="list-style-type: none"> a. Annual average of NO2 and PM10, within AQMAs (Air Quality Management Areas) relative to national standards b. The number of properties affected by poor air quality c. Level of vehicle emissions
4) To reduce greenhouse gases	<ul style="list-style-type: none"> a. Emissions of greenhouse gases, CO2
5) To reduce noise pollution	<ul style="list-style-type: none"> a. The percentage of population which would benefit from quiet road surfacing
6) To reduce light pollution	<ul style="list-style-type: none"> a. Number of new floodlighting installations including the number of fittings installed which minimise light pollution
7) To maintain and improve the water quality of the rivers and groundwater	<ul style="list-style-type: none"> a. Percentage of rivers in plan area whose biological quality is rated as "good". b. Percentage of rivers in plan area whose chemical quality is rated as "good". c. Quality of groundwater
8) To conserve and enhance biodiversity within the plan area	<ul style="list-style-type: none"> a. Hectares of land designated as a Site of Special Scientific Interest (SSSI) b. The number and area of Sites of Nature Conservation Importance (SNCIs) and Local Nature Reserves (LNRs) within Epsom & Ewell c. Extent of ancient woodlands
<i>Achieving a sustainable economy</i>	
9) Provide for employment opportunities	<ul style="list-style-type: none"> a. Proportion of people claiming unemployment benefits who have been out of work for more than one year b. Percentage of population who are income deprived c. Percentage of people of working age that are economically active d. The net change in the number of VAT registrations and deregistrations e. Industrial breakdown of VAT registrations f. Average annual earnings for full time male and females working in the district
10) Make land available to meet the needs of the economy	<ul style="list-style-type: none"> a. The number of granted planning permissions for commercial development b. The area of employment sites lost to other uses

	<ul style="list-style-type: none"> c. The number of rural diversification schemes d. Percentage of vacant employment floorspace e. Shop surveys (growth/change in floorspace use & vacancy rates)
11) Support economic growth which is inclusive, innovative and sustainable	<ul style="list-style-type: none"> a. Number of persons registered in adult education classes b. Growth in GDP and Value Added c. Percentage of economically active people that are unemployable d. Balance between labour supply and labour demand e. Number of residents working at, or from home
12) Balancing the needs for employment and housing to reduce the need to travel	<ul style="list-style-type: none"> a. The area of employment sites lost to other uses b. The number of granted planning permissions for commercial development c. Housing completions d. Proportion of major development located in accessible areas e. Accessibility to public transport, cycling or walking. f. Number and direction (and distance) of journey to work movements
<i>Ensuring a strong, healthy and just society</i>	
13) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	<ul style="list-style-type: none"> g. Percentage of affordable housing delivered per year h. Number of households on the housing register i. Lower quartile housing prices against lower quartile earnings j. Number of unfit homes in the District k. The proportion of new homes with fewer than 3 bedrooms l. Number of older people helped to live at home
14) To facilitate the improved health and wellbeing of the whole population	<ul style="list-style-type: none"> a. Death rates from circulatory disease, cancer and suicides b. Infant mortality rates c. Conceptions among girls under 18 d. Life expectancy e. Percentage of people whose health is classed as good f. Number of new healthcare facilities provided and the number lost to alternative uses g. Performance of Acute NHS Trust and completion of Extra Care Housing
15) To reduce poverty and social exclusion	<ul style="list-style-type: none"> a. Proportion of children under 16 living in income deprived households b. Percentage of population of working age who are claiming key benefits c. Percentage of population who are income deprived d. Average score for Indices of Multiple Deprivation e. Percentage of people achieving five or more A*-C GCSEs f. Level of qualification of those living in the district g. Proportion of adults with poor literacy and numeracy skills h. Percentage of all respondents satisfied with the local bus service i. Number of journeys made on local buses j. Access to services
16) To create and maintain safer and	<ul style="list-style-type: none"> a. The number of recorded offences per 1,000 people

more secure communities	<ul style="list-style-type: none"> b. The proportion of people that live in fear of crime c. Pedestrians/cyclists – number killed and seriously injured d. The number of people killed or seriously injured in road accidents e. Deaths and casualties arising from fires
17) To improve accessibility to all services and facilities	<ul style="list-style-type: none"> a. Proportion of major development located in accessible areas b. Accessibility to public transport, cycling or walking. c. Number and direction (and distance) of journey to work movements
Promoting good governance	
18) To make the best use of previously developed land and existing buildings	<ul style="list-style-type: none"> a. Percentage of dwellings built on previously developed land b. The amount of commercial development built on previously developed land in urban areas c. Average density on sites with 10 or more dwellings d. The number of retail developments within and around town centres
19) To protect, enhance the natural, archaeological, historic environments and cultural assets	<ul style="list-style-type: none"> a. Number of listed buildings, ancient monuments and conservation areas b. Proportion of statutory listed buildings at risk c. Proportion of statutory listed buildings demolished or removed from the list owing to approved or unauthorised alterations. d. Proportion of scheduled ancient monuments at risk e. Proportion of potential archaeological sites where acceptable archaeological assessment took place and Proportion of these where archaeological recording took place to a satisfactory standard having been required. f. Proportion of conservation areas with an appraisal that has been reviewed within the previous 5 years g. The number of unauthorised works undertaken within conservation areas in the previous four years that have been enforced against. h. Number of properties open to the public on heritage open days i. The percentage of residents very or fairly satisfied with cultural assets j. Level of recreation activity associated with biodiversity k. Achievement of 'Accessible Natural Greenspace Standards' l. The promotion and safeguard of open land and green corridors in urban areas m. Improvement in accessibility of the countryside to the public via the Rights of way network
20) To reduce road congestion and the need to travel	<ul style="list-style-type: none"> a. Traffic reduction b. Proportion of travel to work by mode c. Proportion of schools with current travel plans d. Number of businesses with travel plans? e. Length of cycle tracks and number of cycling trips f. Accessibility by public transport, cycling and walking g. Household transport by mode h. Proportion of new development incorporating maximum parking standards.
Using sound science responsibly	

21) To ensure that the District is prepared for the impacts of climate change	<ul style="list-style-type: none"> a. Capacity during 'critical periods' to supply water without the need for restrictions b. Number of homes damaged as a result of an extreme weather event c. Number of sites of ecological interest where flora or fauna were damaged by an extreme or persistent weather event e.g. tree loss from storm, species loss resulting from habitat change caused by persistent dry or wet conditions.
22) To increase energy efficiency of new and existing development	<ul style="list-style-type: none"> a. Energy use per capita b. Improvement in dwelling SAP rating across district c. Number of homes incorporating CHP heating
23) To increase the production and use of renewable energy	<ul style="list-style-type: none"> a. Installed capacity for energy production from renewable sources b. Annual electricity production from renewable sources c. Installed capacity for heat generation from renewable sources d. Annual heat production from renewable sources e. Greenhouse gases displaced annually by total renewable energy generation f. Area of land planted with short rotation coppice g. Area of land planted with energy crops for transport biofuels