

Sustainability Appraisal (SA)  
and  
Strategic Environmental Assessment (SEA) Report  
*(Including Non-Technical Report)*

For the Estates Local Plan (Part of Merton's Local Plan)

**Stage 2**  
**consultation**  
**February – March**  
**2016**

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## Contacts and further information

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## Executive summary (Non technical summary)

- I. This Sustainability Appraisal (SA) is for the stage 2 consultation draft Estates Plan for the following estates High Path (South Wimbledon), Eastfields (Mitcham), and Ravensbury (Morden)<sup>1</sup> herein referred to as the Plan. This SA incorporates the requirements for a Strategic Environmental Assessment (SEA). This SA/SEA report is Stage B of the SA process.

### Purpose of Sustainability Appraisal and Strategic Environment Assessment (SEA)

- II. The purpose of Sustainability Appraisal (incorporating SEA) is to promote sustainable development by integrating social, economic and environmental considerations into the preparation of new or revised Local Plan. By identifying the key sustainability issues likely to be affected by the implementation of a plan, developing options and assessing any significant effects from the earliest stages of plan preparation. SA's are an important tool for developing sound planning policies which are consistent with the government's sustainable development agenda and achieving the aspirations of local communities.
- III. The EU Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive), implemented in the UK by the SEA Regulations 2004 requires environmental assessment to be undertaken on all plans and programmes where they are likely to have significant environmental impacts.
- IV. The purpose of Sustainability Appraisal (incorporating SEA) is to promote sustainable development by integrating social, economic, and environmental considerations into the preparation of new or revised plans and strategies. It is imperative to commence SEA at the early stages of plan making to identify the key sustainability issues likely affected by the implementation of the plan; it assists with creating development options and assesses any significant effects of the proposed development. SA/SEA's are an important tool for developing sound planning policies and planning development plans which are consistent with the Government's sustainable development agenda and achieving the aspirations of local communities.
- V. The SA will:
- Ensure compliance with the SEA Directive, SEA Regulations and guidance on SEA/SA;
  - Review the Local Plan's relationship with other sectorial plan's, and plans operating at a national, regional and more local level with regard to their policies and programmes;
  - Establish the baseline environmental, social and economic characteristics of the area;
  - Identify any current environmental constraints, issues and problems;
  - Help develop viable options and alternatives; and,
  - Review the sustainability impacts of the options.

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<sup>1</sup> Ravensbury estate should not be confused with current development proposals for Ravensbury Terrace, north Wimbledon

- VI. The criteria for determining the significance of effects are taken from schedule 19(2) (a) and 10(4) (a) of the Environmental Assessment of Plans and Programmes Regulations 2004 and are redefined in Appendix 1. These split into criteria related to:
- ↳ The scope and influence of the document; and
  - ↳ The type of impact and area likely affected.
- VII. The regulations apply to a wide range of plans and programmes from local to regional level, including Local Plan documents.
- VIII. At the conclusion of plan preparation, the final SA/SEA report should show how the final plan has addressed the sustainability agenda and the choices made between alternative policies and proposals. The Inspector, when determining the soundness of the plan at the Public Examination stage, will consider this.
- IX. The revised UK Sustainable Development Strategy (March 2005), Expands further on what sustainable development means in terms of the following five principles of sustainable development are identified in ‘Securing the Future’:
- Living within environmental limits
  - Ensuring a strong, healthy and just society
  - Achieving a sustainable economy
  - Promoting good governance
  - Using sound science responsibly
- X. The National Planning Policy Framework (NPPF, 2012) sets sustainable development at the heart of the planning system. The NPPF set out the Government’s planning policies for England and how these are expected to be applied. The NPPF also sets out the requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.
- XI. The NPPF seeks to provide a framework within local councils that are accountable to local people, assist local people to produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities. The three objectives of the NPPF are:
- To put unprecedented power in the hands of communities to shape the places in which they live;
  - To better support growth and give the next generation the chance that present generation has - a decent home, and to allow the jobs to be created on which our prosperity depends; and
  - To ensure that the places we cherish - our countryside, towns and cities are bequeathed to the next generation in a better condition than they are now
- XII. The National Planning Practise Guidance (NPPG) states that Sustainability Appraisals should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan. Therefore this SA/SEA has been carried out taking aboard the NNPPG.

## **Sustainability objectives and decision-making criteria.**

- XIII. Government guidance for undertaking Sustainability Appraisal reiterates that the identification of sustainability problems is an opportunity to define key issues for Local Plans and to develop sustainable plan objectives and options. These are derived from the information revealed by the baseline indicators and assessment and were also informed by:
- The review of other plans and programmes listed in Baseline: Environment, Social and Economic (Appendix A separate document)
  - Other issues arose through on going public engagement as part of the Local Plan process.

## **Methodology**

- XIV. This document forms a Sustainability Appraisal Report (SAR) incorporating the requirements of a strategic environmental assessment (SEA Directive<sup>2</sup>). It provides an account of the process of sustainability appraisal and has been conducted in line with the Communities and Local Government (CLG) Plan Making Manual<sup>3</sup> and the CLG SEA Practical Guide (2005).
- XV. CLG guidance identifies five stages to undertaking sustainability appraisal:
- Establishing the scope of appraisal
  - Assessing effects and considering alternatives;
  - Preparation of a Sustainability Appraisal Report;
  - Consultation; and,
  - Monitoring the effects of implementing the Plan.
- XVI. The methodology is as follows:
- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.
  - **Stage B: Developing and refining options.**
  - **Stage C:** Appraising the effects of the plan.
  - **Stage D:** Consulting on the plan and the SEA/SA report.
  - **Stage E:** Monitoring Implementation of the Plan.
- XVII. Through the application of the process, the council has identified the scope for sustainability appraisal, key sustainability issues, and the likely impacts of the implementation of the plan. For the purposes of this report, Stage A of the methodology has been

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<sup>2</sup> European Directive EC/2001/42 and the subsequent SEA Regulations 2004

<sup>3</sup> See Planning Advisory Service [www.pas.gov.uk](http://www.pas.gov.uk)

undertaken (see the Estates Plan Scoping Report September 2014 – [www.merton.gov.uk/estatesplan](http://www.merton.gov.uk/estatesplan) ), which is divided into six key tasks.

## **Involvement in the consultation**

- XVIII. Consultation is carried out in accordance with Merton's Statement of Community Involvement (SCI) (2006). Under Environmental Assessment Directive 2001/42/EC (SEA Directive) Merton Council is required to consult on the SA/SEA Scoping Report and other SA/SEA reports with three environmental statutory bodies who have environmental responsibilities in England -the **Environment Agency, Natural England** and **Historic England** (formally known as English Heritage). The council intends to consult these named statutory bodies along with other stakeholders with a sustainability remit or local interest.

### **The council's public consultation**

- XIX. Comments from the estates residents, local community, local businesses and other interested parties from the previous consultation stage (Issues and Options) and further research and evidence have informed the Stage 2 consultation draft. It is the Stage 2 consultation draft that this SA, is assessing to ensure the options under consideration promote sustainable development by integrating social, economic and environmental considerations into the preparation towards the final adopted Plan.

Figure 2: Stages of a Sustainability Appraisal

<b>Stage 1. Scope</b>	
<b>Stage 1: Pre-production/Evidence Gathering</b>	
Stage A:	<ul style="list-style-type: none"> <li>• A1: Identifying other relevant policies, plans and programmes, and sustainability objectives.</li> <li>• A2: Collecting baseline information.</li> <li>• A3: Identifying sustainability issues and problems.</li> <li>• A4: Developing the SA framework</li> <li>• A5: Consulting on the scope of the SA.</li> </ul>
<b>Stage 2: Production</b>	
Stage B: Developing and refining options and assessing effects	<ul style="list-style-type: none"> <li>• B1: Testing the Local Plan objectives against the SA framework.</li> <li>• B2: Developing the Local Plan Objectives options.</li> <li>• B3: Predicting the effects of the Local Plan.</li> <li>• B4: Evaluating the effects of the Local Plan.</li> <li>• B5: Considering ways of mitigating adverse effects and maximising beneficial effects.</li> </ul>
Stage C: Preparing the Sustainability Appraisal Report	<ul style="list-style-type: none"> <li>• B6: Proposing measures to monitor the significant effects of implementing the Local Plans.</li> <li>• C1: Preparing the SA Report</li> </ul>
Stage D: Consulting on the preferred options of the Local Plan and SA/SEA Report	<ul style="list-style-type: none"> <li>• D1: Public participation on the preferred options of the Local Plan and the SA Report.</li> <li>• D2 (i): Appraising significant changes.</li> </ul>
<b>Stage 3: Examination</b>	
Stage D: Consulting on the preferred options of the Local Plan and SA/SEA Report	<ul style="list-style-type: none"> <li>• D2 (ii): Appraising significant changes resulting from representations.</li> </ul>
<b>Stage 4: Adoption and monitoring</b>	
Stage D: Consulting on the preferred options of the Local Plan and SA/SEA Report	<ul style="list-style-type: none"> <li>• D3: Making decisions and providing information (Adoption Statement)</li> </ul>
<b>Stage 5: Monitoring the significant effects of implementing the Plan or programme</b>	
Stage E: Post adoption reporting and monitoring	<ul style="list-style-type: none"> <li>• E1: Finalising aims and methods for monitoring.</li> <li>• E2: Responding to adverse effects.</li> </ul>



Figure 3: Sustainability Appraisal process and Local Plan preparation

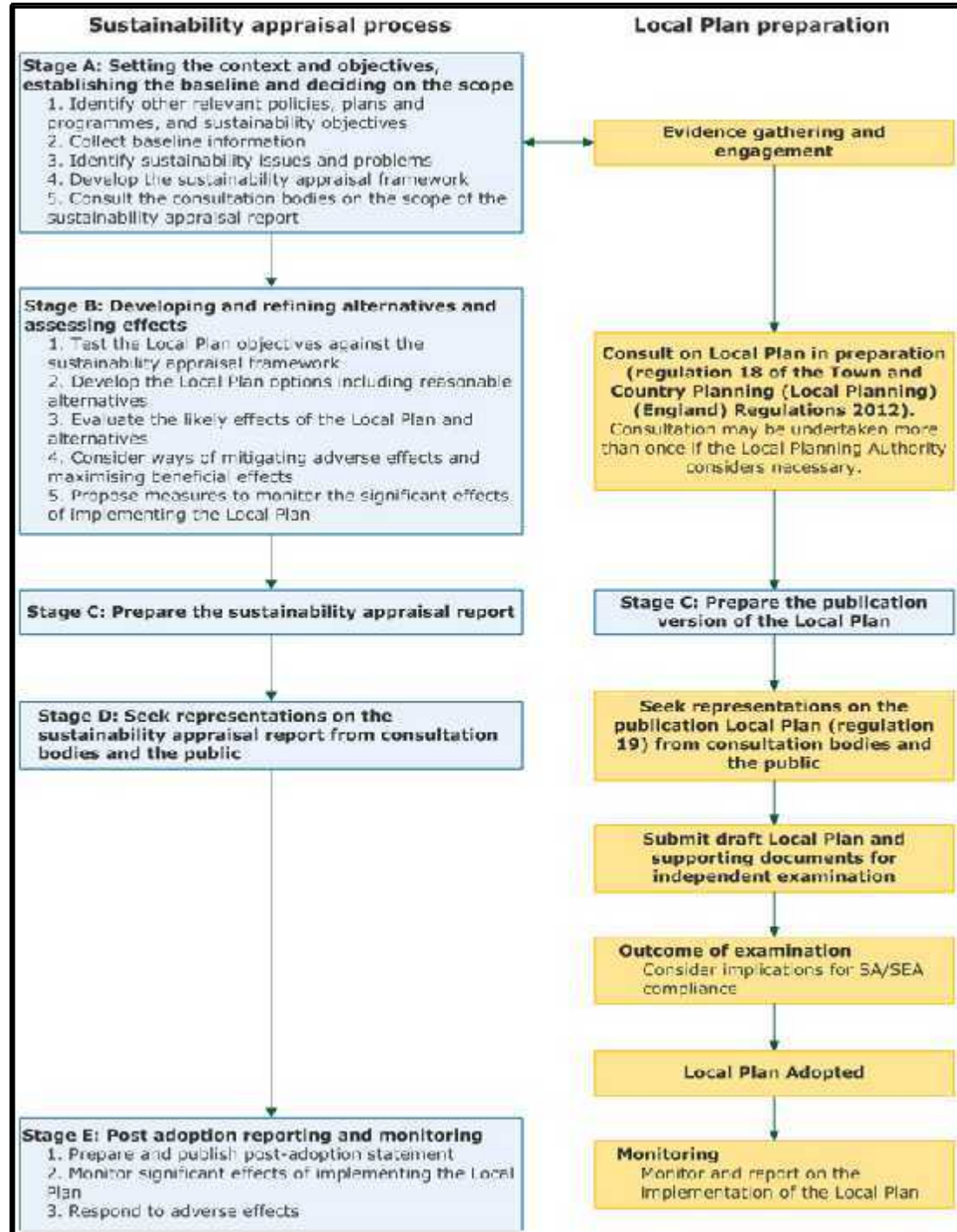


Figure 4: Sustainability Appraisal Objectives

<b>SA/SEA Topic area</b>	
<b><i>Environmental Objectives</i></b>	
1. <i>Land use.</i>	To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.
2. <i>Climate change</i>	Address the causes of climate change through reducing greenhouse gas emissions.  Adapting to the long-term effects of climate change.
3. <i>Water infrastructure and water consumption</i>	Reduce water pollution and improve water quality and resources in the river Wandle and Beverly Brook; improve the biological and chemical status of the River Wandle and Beverly Brook to good by 2027 (Environment Agency).  Reduce water consumption and ensure water saving measures is incorporated in developments.  Ensure adequate water and wastewater infrastructure supports new development.
4. <i>Soil</i>	To maintain and improve water quality in the soil and to remediate existing soil contamination, resulting in an overall improvement in soil quality.
5. <i>Air quality and air pollution</i>	To ensure the risks of air pollution to human health and environment are reduced.
6. <i>Transport</i>	To reduce road congestion and air pollution levels by improving travel choices (promoting public transport, walking and cycling), and reducing the need to travel by private vehicle.
7. <i>Flooding</i>	Reduce the flood risk to people and property from all sources of flooding including surface water flooding.  Compliance with and Flood and Water Management Act 2010.
8. <i>Biodiversity</i>	To enhance Merton's biodiversity.
9. <i>Built environment</i>	To enhance the built environment (including the architectural distinctiveness, townscape/landscape, and archaeological heritage) and ensure new buildings and spaces are well designed and enhance local character.
10. <i>Energy and carbon reduction</i>	Ensure specific measures to improve energy efficiency and reduce greenhouse gas emissions in new developments.

11. <i>Open space</i>	Ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space (including play and recreation areas).
12. <i>Waste</i>	Promote waste minimisation by re-use and recycling in line with reducing net carbon emissions and the waste hierarchy; and to recover the maximum value from residual waste by increasing energy derived from residual waste.
<b>Social Objectives</b>	
13. <i>Housing</i>	Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.
14. <i>Access to culture, leisure and social activities</i>	Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.
15. <i>Social deprivation and poverty</i>	To contribute to reducing poverty and encouraging social inclusion.
16. <i>Health and wellbeing</i>	Improve the health and wellbeing of residents and reduce health inequalities.
17. <i>Services and community facilities</i>	Ensure accessibility to essential services and facilities.
18. <i>Crime</i>	To reduce crime and the fear of crime.
<b>Economic Objectives</b>	
19. <i>Economic growth and business development</i>	Support local economic growth
20. <i>Employment and unemployment</i>	Increase local employment and skills

Figure 5: Key sustainability issues

Sustainability objectives	Key issues
<b>1. Climate change</b>	Climate change is a threat to the lifestyles of Merton residents, to wildlife, cultural heritage and material assets. It is predicted that higher temperatures and lower rainfall may be experienced in the south east. In addition to drinking water shortages, falling groundwater levels could lead to increased risk of subsidence and, where heavy rain falls on a parched ground in late summer the risk of flooding could increase. Green roofs, rain water harvesting, water storage, sustainable drainage and passive cooling are measures that can all contribute to climate change mitigation.
<b>2. Energy and carbon reduction</b>	The London Plan seeks exemplary approaches to waste, energy and water use, management and provision. Merton has been in the forefront for developing strategy for carbon reduction through what was known as the 'Merton Rule' and is eager to build on this progress by focussing on carbon reduction from new developments and also from other energy saving initiatives via Merton's Climate Change strategy. Design measures introduced to address climate change will also help improve energy efficiency energy from waste schemes can also help to reduce carbon.
<b>3. Biodiversity</b>	Merton has a rich wealth of habitats and species that should be protected from adverse impacts of development, climate change and enhanced where possible. The London Plan seeks improved quality of the public realm and to see the creation a new regional park that integrates and contributes to the regeneration of the Wandle Valley Development Corridor.
<b>4. Access to nature and open space</b>	Merton enjoys an excellent provision to open space especially existing commons and along the River Wandle but there is scope for increasing the opportunity for contact with nature and open space and improving the quality of the public realm. The creation of the Wandle Valley Regional Park within London's Green Grid will help improve access to nature and open space as well as create recreation opportunities.
<b>5. Natural resources</b>	There is a finite level of resources that need to be distributed over a larger population and housing level.
<b>6. Waste</b>	There is a need to identify new facilities to accommodate a move away from land filling waste. The South London Waste Plan, with its aim to divert 100% of waste from landfill, will make a major contribution to this. Managing waste sustainably via energy from waste will also contribute to mitigating against climate change and energy and carbon reduction.

<b>7. Water quality and resources</b>	Climate change, population growth and lifestyle choices are increasing the amount of water used and affecting the quality of the River Wandle, Beverly Brook and their tributaries.
<b>8. Flooding</b>	Merton experiences flooding from a number of sources especially fluvial flooding from the River Wandle, Beverly Brook and their tributaries. Surface water flooding is also an issue in some isolated parts of the borough.
<b>9 Air quality</b>	Air quality is improving but there is further scope to reduce atmospheric pollution across the borough by supporting public

XX. As with other Sustainability Appraisals and Strategic Environment Assessment carried out on Merton’s development planning documents officers consulted with other officers and teams for example conservation and heritage officers, environmental officers/teams, arboriculture officers and biodiversity officers to name a few.

**Summary of influence of appraisal on the Plan**

XXI. The findings of this appraisal will influence and help to ensure the most sustainable Plan in terms of where more housing and economic growth will occur; the most sustainable ways in which to pursue this growth on the estates and surrounding area, and to guide the vision of the Plan thus ensuring sustainable development is at the heart of decisions relating to the individual estates.

XXII. As with other Sustainability Appraisals and Strategic Environment Assessment carried out for Local Plan development documents for example Core Planning Strategy and Sites and Policies Plan, planning officers consulted with for example conservation and heritage officers, environmental and biodiversity officers and arboriculture officers.

**Monitoring**

XXIII. In line with the National Planning Policy Guidance (NPPG), the Plan must emphasise the importance of monitoring the effects of implementing the plan. In particular, monitoring will help to identify problems that may arise during implementation of a Plan; thereby making a more accurate prediction of effects in future and may add to or inform the accumulation of baseline information for future use.

**Recommendations and conclusion**

XXIV. As part of any Sustainability Appraisal it is not only necessary but essential to identify key sustainable issues. The role of the Plan is to take abroad the key sustainability issues in a manner that maximises the benefits to sustainability and avoids adverse sustainable impacts, not only for estates residents but also the surrounding area that could be also impacted by any development that occurs.

- XXV. The findings and recommendations of this SA will influence, inform and help to define the most sustainable Plan in terms of where housing and economic growth will occur. The most sustainable ways in which to pursue this growth and to guide the vision of the Plan thus; ensuring sustainable development is at the heart of the Plan.
- XXVI. The Plan has taken abroad the key sustainability issues in a manner that maximises the benefits of sustainability and avoids adverse sustainable impacts; not only for the residents on the estates but also the surrounding area (residential and commercial) and the environment both physical and natural. The Plan needs to have a balanced approach in terms for example housing, built environment and historic assets, businesses and the local economy, open space, built environment, heritage assets, community facilities, flooding and transport.
- XXVII. As with other documents within Merton Local Plan it is essential that the Estates Local Plan has a positive impact and aims to minimise and/or improve the inequalities including health and well-being in the borough especially in the east of the borough. The 2015 Indices of Multiple Deprivation (IMD) shows that Merton ranks 'very low' in terms of overall social deprivation compared to other London boroughs. However a number of pockets of deprivation exist within Merton. These pockets are mainly in the eastern wards (such as Figge's Marsh, Cricket Green, Lavender, Graveney and Ravensbury) and some smaller pockets in the western wards (Trinity, Abbey and Hillside). The three estates are within identified areas of deprivation according to the IMD.
- XXVIII. Furthermore and importantly the Plan and any submitted development proposals must create mixed and inclusive communities and avoid housing segregation of the estates population by housing tenure, design and layout and truly create inclusive communities.
- XXIX. The Plan and any submitted development proposals needs to ensure it adopts inclusive environment design principles following engagement with relevant user groups, the principles of inclusive design, including the specific needs of older person, disabled and the health and well-being (including mental health), people with reduced mobility people and demonstrated how these have been integrated into any proposals.
- XXX. As stated earlier in this report the Plan gives effect to the Merton Local Plan. The Plan is statutory required to be in conformity with Merton's Local Plan as well the NPPF, NPPG, the London Plan and supporting documents for the fore mentioned documents for example Supplementary Planning Guidance/Documents (SPG/SPD). The aim of the Plan is provide a statutory planning development framework which informs any development proposals on the three estates. The main objective of the Plan is to contribute to the delivery of Merton's Local Plan Strategic Objectives (found in Core Planning Strategy).
- XXXI. Once adoption the Plan will become part of Merton's Local Plan and will be part of the statutory development plan to guide any development proposals on the three estates alongside Merton's Core Planning Strategy 2011; Sites and Policies Plan 2014 and the Mayor's London Plan 2015. All of the afore mentioned planning documents have all been subjected to a full SA/SEA and other assessment for example Habitat Regulation Assessment (HRA) and public examination before adoption.



# Sustainability Appraisal Technical report

## 1 Introduction

- 1.1 This Sustainability Appraisal (SA) is for the stage2 consultation draft of the Estates Plan for the following estates High Path (South Wimbledon), Eastfields (Mitcham) , and Ravensbury <sup>4</sup>(Morden) herein referred to as ‘the Plan’. This SA incorporates the requirements for a Strategic Environmental Assessment (SEA). The council has undertaken a SA Scoping Report in September 2014 and Issus and Option SA (October – November 2014), in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004. These can be viewed on the council’s website [www.merton.gov.uk/estatesplan](http://www.merton.gov.uk/estatesplan)

## 2 Purpose of Sustainability Appraisal and Strategic Environment Assessment (SEA)

- 2.1 The EU Strategic Environmental Assessment Directive 2001/42/EC (SEA Directive), implemented in the UK by the SEA Regulations 2004, requires environmental assessment to be undertaken on all plans and programmes where they are likely to have significant environmental impacts.
- 2.2 The purpose of Sustainability Appraisal (incorporating SEA) is to promote sustainable development by integrating social, economic, and environmental considerations into the preparation of new or revised plans and strategies. It is imperative to commence SEA at the early stages of plan making to identify the key sustainability issues likely affected by the implementation of the plan; it assists with creating development options and assesses any significant effects of the proposed development. SA/SEA’s are an important tool for developing sound planning policies and planning development plans which are consistent with the Government’s sustainable development agenda and achieving the aspirations of local communities.
- 2.3 The purpose of this SA report is to:
- Ensure compliance with the SEA Directive, SEA Regulations and guidance on SEA/SA;
  - Review the Local Plan’s relationship with other sectorial plan’s, and plans operating at a national, regional and more local level with regard to their policies and programmes;
  - Establish the baseline environmental, social and economic characteristics of the area;
  - Identify any current environmental constraints, issues and problems;

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<sup>4</sup> Ravensbury Estate should not be confused with current development proposals for Ravensbury Terrace in north Wimbledon



- Help develop viable options and alternatives; and,
- Review the sustainability impacts of the options.

2.4 The criteria for determining the significance of effects are taken from schedule 19(2) (a) and 10(4) (a) of the Environmental Assessment of Plans and Programmes Regulations 2004 and are redefined in Appendix 1. These split into criteria related to:

- i. the scope and influence of the document
- ii. the type of impact and area likely affected

2.5 The regulations apply to a wide range of plans and programmes from local to regional level, including Local Plan documents.

2.6 At the conclusion of plan preparation, the final SA/SEA report should show how the final plan has addressed the sustainability agenda and the choices made between alternative policies and proposals. The Inspector will consider this when determining the soundness of the plan at the Public Examination stage.

### 3 Stage B: Developing and refining options and assessing effects

#### **Testing the development plan document objectives against the Sustainability appraisal framework (Task B1)**

3.1 The National Planning Policy Guidance (NPPG) emphasises the importance of securing compatibility between plan objectives and sustainability principles. Therefore, testing Plan's objectives and policies against the sustainability objectives is one of the ways of achieving this and will help to eliminate conflict between them.

#### **Developing the Development Plan Document options (Task B2)**

3.2 The NPPG gives detailed advice on the development of options to achieve sustainable planning objectives. Development planning documents must improve the situation that would otherwise exist if there was no plan and improve the effects.

3.3 The NPPG recommends that broad, strategic options are considered and that the findings of sustainability appraisal and consultation will inform the selection, alteration and publication of preferred options. As each option is refined commentary on sustainability issues and problems must be prepared and may include recommendations for the improvement of the options. Some options may be dropped from further consideration in the light the of sustainability appraisals, compliance with national planning policy. However, the sustainability appraisal report must show this process.

### **Predicting the effects of the development plan document (Task B3)**

- 3.4 The NPPG states the need to predict the potential sustainability effects of the plan and its options in relation to the baseline situation. Predicting the effects of development planning documents will help to demonstrate its deliverability and potential impediments which need to be addressed.

### **Evaluating the effects of the development plan document (Task B4)**

- 3.5 Once the effects of the Plan have been predicted, an evaluation of their significance needs to be made in line with the NPPG guidance.

### **Considering ways of mitigating adverse effects and maximising beneficial effects (Task B5)**

- 3.6 Sustainability appraisal report must include measures to prevent, reduce or offset significant adverse effects of implementing the plan. The measures may include proactive avoidance of adverse effects. Ideas for the mitigation of adverse effects and maximisation of benefits are given.

### **Proposing measures to monitor the significant effects of implementing the DPD (Task B6)**

- 3.7 In line with guidance, the development plan must emphasise the importance of monitoring the effects of implementing the plan. In particular, monitoring will help to identify problems that may arise during implementation of a Plan; thereby making a more accurate prediction of effects in future and may add to or inform the accumulation of baseline information for future use.

## **4 Compliance with the Habitats Regulations Assessment Regulation 48**

- 4.1 The EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna) passed in to domestic law by way of the Habitats Regulations (Conservation (Habitats &c) Regulations, 1994). As a consequence any development proposal that is not part of a specific management prescription that might have a significant effect on a Natural 2000 sites (also known as European sites) must be subject to Appropriate Assessment (AA).
- 4.2 Regulation 48 of the Habitats Regulations responds to the provisions of Article 6 (3) and (4) of the Directive which sets out provisions for determining whether the plan is likely to have a significant effect on the integrity of a Natural 2000 Site, including Special Protection Area, Ramsar sites (Wetlands sites) and Special Areas of Conservation.

## Habitats Regulations Assessment Screening

- 4.3 The Habitats Regulations identifies Merton Council as the 'Competent Authority' which is responsible for deciding whether adverse effects are likely. The council has consulted with Natural England which is the Government's advisor in this respect. A consideration has been made of the objectives and proposals of the Plan against the conservation objectives for European sites. Whilst the screening process has determined that it is not likely that the Plan would lead to any adverse impact on the integrity of European sites, emerging issues have informed sustainability appraisal:
- Wimbledon Common Special Area of Conservation and Sites of Special Scientific Interest (SSSI) 1.5km to the north west of Wimbledon town centre has been designated primarily to protect the Stag Beetle *Lucanus cervus*. It is also an important example of two habitats: Northern Atlantic wet heath with *Erica Tetralix* and European dry heaths
  - Richmond Park Special Area of Conservation, west of Wimbledon is also designated to protect the Stag Beetle. The Royal Park is closed every night at dusk;
  - Air pollution can have an adverse impact on the habitats and/or the stag beetle;
  - Recreation can have an adverse impact on the habitats and/or stag beetle.

## 5 Equalities Impact Assessment (EqIA)

- 5.1 The Equality Act 2010 replaces previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection; and sets out the different ways in which it's unlawful to treat someone. Before, the Act came into force there were several pieces of legislation to cover discrimination, including:
- Sex Discrimination Act 1975
  - Race Relations Act 1976
  - Disability Discrimination Act 1995
- 5.2 At the decision making stage local authorities are required to assess how changes to policies and service delivery will affect different people. In 2011, the Act extended protection against discrimination to nine 'Protected Characteristics'- which includes the following:
- Age
  - Disability
  - Sex/Gender
  - Race or belief
  - Religion
  - Sexual Orientation
  - Gender Reassignment
  - Marriage and Civil Partnership
  - Pregnancy and Maternity
- 5.3 As with the SA/SEA the EqIA will inform and influence the development of the Plan towards adoption.

## 6 Health impact assessment (HIA)

- 6.1 Although not a statutory requirement Merton Council is carrying out a Rapid Health Impact Assessment in accordance with the Mayor of London's Social Infrastructure Supplementary Planning Guidance, London Healthy Urban Development Unit (HUDU) planning checklist and Rapid HIA tool. The London Plan policy 3.2 Improving health and addressing health inequalities (part c) states that:

*'New development should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce inequalities.'*

- 6.2 The purpose of a HIA is to promote sustainable development by integrating health and well-being (including mental health) considerations into the preparation of plans or strategies; by identifying the key health and wellbeing issues and the groups that are likely to be affected by the implementation of the Plan in accordance with the aforementioned London Plan policy.
- 6.3 The HIA will be used to assess each stage of the Plan's making process and make recommendations to mitigate identified negative impacts, to enhance the proposals or to secure a positive impact. The final HIA report would show how the final draft of the Plan will secure health and wellbeing benefits; and how identified adverse impacts in the earlier drafts of the Plan have been avoided or minimised.

## 7 Monitoring

- 7.1 The National Planning Policy Guidance (NPPG) states that local planning authorities should not need to undertake comprehensive assessment exercises more frequently than every five years although they should be updated regularly, looking at the short-term changes in housing and economic market conditions. Merton will be monitoring this Plan against the same indicators in Merton's Local Plan and will report and publish by way of the annual Authority Monitoring Report which is available on Merton's website each year.

# Appraisal of Estates Plan

## 8 Background to the Estates Plan

8.1 The policies within the Plan (stage 2 consultation), have been developed and informed by the comments from residents, businesses, key stakeholders, environmental groups and other interested groups from the previous round of consultation (Issues and Options stage); further evidence and existing planning policies (national, regional and local). The Plan gives effect to the Merton Local Plan strategic and development management policies, vision and strategic objectives. The Plan is statutory required to be in conformity with the Local Plan as well as national and regional planning policies and guidance.

8.2 In accordance with the NPPG para 152 states that

*'Local Plans should be aspirational but realistic'. It continues to state that '...Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where'.*

8.3 Thus the aim of the Plan in conjunction with Merton's Local Plan is provide a statutory planning development framework which informs potential development on the three estates which, will contribute to sustainable development and contribute to the delivery of Merton's Local Plan strategic objectives.

8.4 Once adopted the Plan will become part of Merton's Local Plan and will be a major consideration in any development proposals on each estate as well as other national, regional and local planning policies and guidance.

## 9 Sustainability Appraisal of the Plan

9.1 A high level and robust approach to the appraisal of the Plan has been adopted. It focuses on the principal themes into which the individual Plan policies are arranged, density and building heights, new homes, public realm, more connected areas, local economic and social opportunities; delivery and implementation and how these perform against the sustainability objectives (Figure 6).

9.2 It should be noted that this SA is only appraising polices within in this Plan and it is those polices that are under review. This SA is not appraising other adopted planning documents within Merton's Local Plan all of which were subjected to a full SA/SEA at all stages towards adoption.

Figure 6: Sustainability Appraisal Objectives.

<b>SA/SEA Topic area</b>	
<b><i>Environmental Objectives</i></b>	
1. <i>Land use.</i>	To ensure development optimises the use of land to benefit residents, businesses, other occupiers and the surrounding area.
2. <i>Climate change</i>	Address the causes of climate change through reducing greenhouse gas emissions.
3. <i>Water infrastructure and water consumption</i>	Adapting to the long-term effects of climate change. Reduce water pollution and improve water quality and resources in the river Wandle and Beverly Brook; improve the biological and chemical status of the River Wandle and Beverly Brook to good by 2027 (Environment Agency).  Reduce water consumption and ensure water saving measures is incorporated in developments.
4. <i>Soil</i>	Ensure adequate water and wastewater infrastructure supports new development. To maintain and improve water quality in the soil and to remediate existing soil contamination, resulting in an overall improvement in soil quality.
5. <i>Air quality and air pollution</i>	To ensure the risks of air pollution to human health and environment are reduced.
6. <i>Transport</i>	To reduce road congestion and air pollution levels by improving travel choices (promoting public transport, walking and cycling), and reducing the need to travel by private vehicle.
7. <i>Flooding</i>	Reduce the flood risk to people and property from all sources of flooding including surface water flooding.
8. <i>Biodiversity</i>	Compliance with and Flood and Water Management Act 2010. To enhance Merton's biodiversity.
9. <i>Built environment</i>	To enhance the built environment (including the architectural distinctiveness, townscape/landscape, and archaeological heritage) and ensure new buildings and spaces are well designed and enhance local character.
10. <i>Energy and carbon reduction</i>	Ensure specific measures to improve energy efficiency and reduce greenhouse gas emissions in new developments.
11. <i>Open space</i>	Ensure the provision of sufficient well-designed, accessible private amenity, communal and public open space (including play and recreation areas).

12. <i>Waste</i>	Promote waste minimisation by re-use and recycling in line with reducing net carbon emissions and the waste hierarchy; and to recover the maximum value from residual waste by increasing energy derived from residual waste.
<b>Social Objectives</b>	
13. <i>Housing</i>	Contribute to meeting Merton's housing needs, increasing the opportunity for people to live in a decent and affordable home.
14. <i>Access to culture, leisure and social activities</i>	Enhance opportunities for culture, leisure and social activities within the estate and / or by improving access to facilities.
15. <i>Social deprivation and poverty</i>	To contribute to reducing poverty and encouraging social inclusion.
16. <i>Health and wellbeing</i>	Improve the health and wellbeing of residents and reduce health inequalities.
17. <i>Services and community facilities</i>	Ensure accessibility to essential services and facilities.
18. <i>Crime</i>	To reduce crime and the fear of crime.
<b>Economic Objectives</b>	
19. <i>Economic growth and business development</i>	Support local economic growth
20. <i>Employment and unemployment</i>	Increase local employment and skills

9.3 As mentioned earlier in this report the NPPG states that Sustainability Appraisals should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan. As the Plan is required to be in conformity with Merton's Local Plan including the strategic objectives and spatial aims, which have all been subjected to SA/SEA at various stages towards adoption, bearing this in mind and the recommendation of the NPPG this SA has focused mainly on the likely significant impacts.

Figure 7: Key to Symbols Used in the Appraisal

Symbol	Meaning
++	Significant positive effect on Sustainability Objective (normally direct)
+	Minor positive effect on Sustainability Objective (normally indirect)
0	Neutral effect on Sustainability Objective
-	Minor negative effect on Sustainability Objective (normally indirect)
--	Significant negative effect on Sustainability Objective (normally direct)
?	Uncertain effect on Sustainability Objective

- 9.4 It should be noted that a score of *'Uncertain effect on sustainability objective'* does not necessary mean that the impact is judged to have an negative impact – it could mean that at the time of the SA being undertaken, its is not known what the impact could be due to either, a lack of evidence or further evidence is required or robust evidence was not available at the time the SA was undertaken. It should also be noted the policies with in the Plan are estates specific (those named in para 1.1) and that any development(s) will need to have consideration to of Merton Local Plan policies. The policies within the Plan do not duplicate other existing planning policies but do give extra estate specific policy requirements and guidance of what is expected on the each estate in terms of future development proposals.
- 9.5 As stated earlier in this report this SA assessment is only focusing on the Stage 2 consultation draft of the Estates Local Plan not any other planning documents within Merton's Local Plan.



# Sustainability Appraisal Assessment: Eastfields Estate

## ***E1 Townscape***

- 10.1 The policy aims to ensure that any development creates a neighbourhood that is easier to get around and understand, open and inviting and visually attractive both for residents and visitors to the area. The policy seeks to create better relationships with the surrounding area. At presents the way the estate was laid out when it was built is somewhat cut off form surrounding streets and neighbourhoods. The policy, as required by the NPPF, seeks to secure high quality design and good standard of amenity for all existing and future occupants of land and buildings.

## ***E2 Street network***

- 10.2 With policy EP E1 the policy seeks to make the estate feel more open and connected to the surrounding streets and neighbourhood. It aims to ensure that a new development would feel easy and safe for residents and visitors to find their way around, it has a positive effect on social objectives as well as travel and transport.

## ***E3 Movement and access***

- 10.3 The policy seeks to improve the movement and access by providing better links for all travel modes across the estate and surrounding streets. The policy outlines a number of requirements such as wider streets and upgrading of footways for example to provide better accessibility for local residents and improve links around the estate and to the surrounding area.

## ***EP E4 Land use***

- 10.4 The policy seeks to ensure that the land use is used effectively to meet the needs of local residents in sustainable way by firstly ensuring that predominant land use is residential.

## ***E5 Open space***

- 10.5 The policy seeks to ensure that open space is provided to the same or greater extent than that which currently exists. The policy supports the Mayor of London's requirement for suitably designed play space for all ages. The policy seeks to enhance residents' quality of life through the provision of open spaces, retaining existing mature trees and planting more, recreation areas, green corridors, biodiversity and climate change. This will also supports the council's strategies to improve local health and well-being.

### ***E6 Environmental protection***

- 10.6 The policy seeks to ensure that environmental issues such as drainage and managing flood risk are central to the layout of any development proposal. The Plan recognises that there has been surface water flooding issue on the estate and states that there is a requirement for flood mitigation measures to be adopted on the estate by way of design and layout.
- 10.7 The policy seeks to create opportunities for the use of sustainable urban drainage systems and other mitigation measures which offer a number of benefits such as improving water quality management, reducing pollution and create better amenity and places for people. As with EP E5 the policy also makes requirements for the existing trees to be retained and highlights the important role they play in biodiversity and flood risk mitigation.

### ***E7 Landscape***

- 10.8 The policy seeks to improve the views and physical links on the estate and surrounding area by firstly recognising and taking into account the existing local character and the roles it can play in creating a sustainable development, softening the landscape and creating visual links around the estate. With policy EP E6, the policy seeks to keep existing mature trees, plant new trees and ensure a high quality, landscaped open spaces. The policy has strongly supports sustainability objectives relating to the environment and health and wellbeing.

### ***E8 building heights***

- 10.9 The policy seeks to ensure that the existing environment in and around Eastfields (for example existing mature trees, the views of the estate from the surrounding neighbourhood is a major consideration in regard to building heights. The policy states that building heights should be between 2-4 storey high and provides guidance on building heights that will enhance the suburban character of the estate location and neighbouring streets. This policy supports objectives on the built environment and also social objectives which relate to the way the estate could look and feel.

Figure 8: Eastfields SA assessment

SA Objectives	Policy							
	EP 1	EP 2	EP 3	EP 4	EP 5	EP 6	EP 7	EP 8
<b>Environmental Objectives</b>								
1. Land use.	++	++	+	++	++	+	++	++
2. Climate change	0	0	0	0	++	+	+	0
3. Water infrastructure and water consumption	0	0	0	0	+	++	+	0
4. Soil	+	+	0	0	+	++	++	0
5. Air quality and air pollution	0	0	+	0	++	+	++	0
6. Transport	+	++	++	0	0	0	0	0
7. Flooding	0	0	0	0	+	++	+	0
8. Biodiversity	0	0	+	0	+	++	++	+
9. Built environment	+	+	0	+	+	+	+	+
Energy and carbon reduction	0	0	0	0	+	0	0	0
11. Open space	+	0	+	0	++	+	++	0
12. Waste	0	0	0	0	0	0	0	0
<b>Social Objectives</b>								
13. Housing		+	0	++	0	0	0	++
14. Access to culture, leisure and social	+	+	+	0	+	+	+	0

activities								
15. Social deprivation and poverty	+	+	+	+	+	+	+	+
16. Health and wellbeing	+	+	+	+	++	++	++	+
17. Services and community facilities	+	0	+	0	+	+	0	0
18. Crime	+	+	+	0	0	+	+	+
<b>Economic Objectives</b>								
	0	0	+	+	0	0	0	0
19. Economic growth and business development								

## 10 Sustainability Appraisal assessment and summary High Path

### ***EP HP 1 Townscape***

- 11.1 The policy aims to ensure that new development creates a neighbourhood that is easier to get around and find where you are going both for the residents and visitors to the area, with clear and unobstructed views through the design and layout. The policy, as required by the NPPF, seeks to secure high quality design and good standard of amenity for all existing and future occupants of land and buildings.
- 11.2 The policy is influence and informed by the existing surrounding streets and aims to integrate the surrounding streets form and layout throughout the estate. The policy seeks transform the current layout and feel of the estate such as the feeling of the estate being a bit cut off from the surrounding streets/neighbourhood, and therefore assists in creating a more inclusive neighbourhood with the neighbouring streets.
- 11.3 The policy also considers that it is very important for any developer to engage with Transport for London (TfL) due to the location of the estate (close to South Wimbledon underground station) and the possible tram link extension from South Wimbledon station to Morden Road tram stop and on to Sutton.

### ***HP 2 Street network***

- 11.4 As with HP1, this policy seeks to ensure that any development proposal creates a neighbourhood around the historic street pattern, creating stronger north-south and east-west links to make it easier to understand the area and find their way around.. The policy also considers how areas outside the draft Plan boundary such as Rodney Place, Merton High Street and Merantum Way, could relate to the estate.

### ***HP 3 Movement and access***

- 11.5 The policy seeks to create safe, attractive and sociable streets, improving the movement and access by providing better links to the surrounding area and better understanding of the streets layouts - which will help to addresses localised congestion both through the estate and the surrounding road network. The policy encourages on-street parking and improvements to pedestrian and cycle links.

### ***HP 4 Land use***

- 11.6 The policy makes it clear that the main land use should be residential; that residential development should be in line with London Plan densities, that denser development should be closer to the transport interchange at South Wimbledon. This policy also

influences creating safe and sociable neighbourhoods and those new homes should have private (defensible) space between the street and front door and to ensure that homes have doors and windows facing onto the streets (active frontages). This policy has positive effects for the build environment and creating a sense of community safety and sociability.

***HP5 Open space***

- 11.7 The policy seeks to enhance the quality of life through the provision of open spaces, recreation areas, green corridors, biodiversity and climate change. It will also supports the council's strategies to improve local health and well-being. It has positive effects on many environmental and some social objectives.

***HP 6 Environmental protection***

- 11.8 The policy seeks to ensure that environmental issues such managing flood risk through sustainable drainage systems and retaining existing mature trees are central to the layout of any development proposal. The policy also meets social objectives by supporting an attractive local environment and assessment of combined heat and power.

***HP7 Landscape***

- 11.9 The policy seeks to improve the views and physical links on the estate and surrounding area, and takes into account of the existing environmental character namely the existing mature tree that are on the estate and the role they can play in creating a sustainable development and softening the landscape. With HP 6, this policy requires high quality landscaping throughout the estate to make an attractive estate for residents that has additional benefits such as reducing air pollution and flood mitigation.

***HP 8 building heights***

- 11.10 The policy has been influenced by the existing character both on the estate and surrounding areas, such as Merton High Street. This policy of creating some consistency in building heights influences the way the new estate would look and feel.

Figure 9: High Path SA assessment

SA Objectives	Policy							
	HP 1	HP 2	HP 3	HP 4	HP 5	HP 6	HP 7	HP 8
<b>Environmental Objectives</b>								
1. Land use.	++	++	+	++	+	+	+	++
2. Climate change	0	+	+	0	+	++	+	0
3. Water infrastructure and water consumption	0	0	0	0	0	++	+	0
4. Soil	0	+	0	+	+	+	+	0
5. Air quality and air pollution	0	+	0	0	+	+	+	0
6. Transport	+	+	++	+	0	0	0	0
7. Flooding	0	+	+	0	+	++	+	0
8. Biodiversity	0	+	+	0	+	+	+	0
9. Built environment	++	+	+	0	+	+	+	++
10. Energy and carbon reduction	0	0		0	0	++	+	0
11. Open space	0	0	0	0	++	+	+	0
12. Waste								
<b>Social Objectives</b>								
13. Housing	+	0	0	++	0	0	0	+
14. Access to culture,	+	0	+	0	+	+	+	0

leisure and social activities								
15. Social deprivation and poverty	+	+	0	0	+	+	+	+
16. Health and wellbeing	+	0	+	+	+	+	+	+
17. Services and community facilities								
18. Crime	+	+	+	+	0	0	+	0
<b>Economic Objectives</b>								
19. Economic growth and business development	0	0	0	0	0	0	0	0



## 11 Sustainability Appraisal Assessment and summary Ravensbury Estate

### ***R1 Townscape***

- 12.1 The policy aims to ensure that any development creates a neighbourhood that is influenced by the surrounding historic, green and built environment such as the National Trust Park, the Ravensbury Park and Ravensbury Mill. The policy seeks to ensure that any development has a sensitive relationship with the character of the area and retains the feeling of a quiet residential neighbourhood in a green setting. This policy supports health and wellbeing objectives as well as those relating to the built environment.

### ***R2 Street network***

- 12.2 As with R1, this policy seeks to ensure that any submitted development proposal respects the historic, green and built environment. The policy seeks to create better links between these features to and from the estate and that any development should create clear views between the attractive parks, homes and historical assets and retain and enhance such features.

### ***R3 Movement and access***

- 12.3 The policy seeks to improve the movement and access by providing better links and access to the surrounding built/green environment such as the parks. Furthermore the policy provides opportunities for public realm improvements along the River Wandle which would provide better access between the estate, Morden Hall Park and Ravensbury Park for example. The policy seeks to ensure the estate feels easy and safe to move around, improves pedestrian and cycle links. This policy supports several social and environmental objectives.

### ***R4 Land use***

- 12.4 The policy sets out the development requirement type for the estate and the requirement for the community hall to be re-provided. This policy has positive effects for the built environment, access to social activities and creating a sense of community safety and sociability.

### ***R5 Open space***

- 12.5 The policy seeks to ensure that the existing open space is enhanced through landscaping and that links to all the surrounding open space is improved. Furthermore the policy requires well designed play space. This policy would benefit residents and visitors quality of life through the provision of open spaces, recreation areas, green corridors, biodiversity and climate change mitigation. In addition the aforementioned will also support the council's strategies to improve local health and well-being.

### ***R6 Environmental protection***

- 12.6 The policy seeks to ensure that environmental issues such as flooding are a consideration; this is essential due to the estate's location. The policy recognises that the area has been assessed as being at risk of fluvial flooding estate itself and states very clearly that mitigation measures are required as part of any proposed development by way of design and layout. The inclusion of Sustainable Drainage Systems creates opportunities for mitigation measures which, offer a number of benefits not only for the estate itself but for the green environment that surrounds the estate such as improving water management and reducing likelihood of pollution while maintaining an attractive environment.

### ***R7 Landscape***

- 12.7 With R5 and R6 this policy seeks to enhance the public realm on the estate with strong landscaping as a prominent feature within the public realm, linking the surrounding parks and green features. The policy seeks to encourage tree planting which will enhance the local area. The tree planting will also have the benefits of reducing pollution, create views to the park and be sympathetic to the existing built and green environment.

### ***R8 building heights***

- 12.8 The policy of setting a range of 2-4 storey buildings has been influenced by the attractive existing green character both on the estate and surrounding areas for example the existing building heights and the height of the existing mature trees on the estate and surrounding area.

Figure 10: Ravensbury SA assessment

SA Objectives	Policy							
	RP 1	RP 2	RP 3	RP 4	RP 5	RP 6	RP 7	RP 8
<b>Environmental Objectives</b>								
1. Land use.	++	++	+	++	+	+	0	+
2. Climate change	0	0	0	0	+	+	+	+
3. Water infrastructure and water consumption	0	0	0	0	+	+	+	0
4. Soil	0	0	0	0	+	+	+	0
5. Air quality and air pollution	0	0	0	0	+	+	+	0
6. Transport	0	0	++	0	0	0	0	0
7. Flooding	0	+	0	0	+	++	+	0
8. Biodiversity	0	+	+	0	+	+	+	+
9. Built environment	++	+	++	+	+	+	+	+
10. Energy and carbon reduction	0	0	0	0	0	0	0	0
11. Open space	+	+	++	0	++	+	+	+
12. Waste	0	0	0	0	0	0	0	0
<b>Social Objectives</b>								
13. Housing	0	0	0	++	0	0	0	0

14. Access to culture, leisure and social activities	+	+	++	+	+	+	+	+
15. Social deprivation and poverty	+	+	+	++	+	+	+	+
16. Health and wellbeing	+	+	+	+	+	+	+	+
17. Services and community facilities	+	+	0	+	+	0	0	0
18. Crime	+	0	+	+	0	0	+	+
<b>Economic Objectives</b>								
19. Economic growth and business development	0	0	0	0	0	0	0	0

## 12 Recommendations

- 13.1 The Plan and any submitted development proposals must create mixed and inclusive communities and avoid breaking up the estates population by housing tenure, design and layout in accordance with NPPF, the London Plan and Local Plan policies.
- 13.2 There is always a balance to be sought with housing, employment and community activities, including open space and the natural environment in regard to any development. Any submitted planning proposals will need to ensure it adopts inclusive environment design principles following engagement with relevant user groups, the principles of inclusive design, including the specific needs of older people, disabled and the health and well-being (including mental health), people with reduced mobility people and demonstrated how these have been integrated into any proposals in accordance with the Plan.

## 13 Conclusion

- 14.1 In general the draft Plan (February 2016) has been found to have a wide range of positive and significant positive effects on the objectives. The Plan has taken on broad the key sustainability issues in a manner that maximises the benefits of sustainability and avoids adverse sustainable impacts not only for the residents on the estates but also the surrounding area (residential and commercial) and the environment both physical and natural.
- 14.2 The Plan has site- specific policies that have been developed in consideration with the characteristic for each estate for example the existing green environment and surrounding street networks.
- 14.3 Furthermore the Plan re-affirms the government's strategy of achieving sustainable development. The United Nations General Assemble Resolution 42/187 defined sustainable development as:
- 'Meeting the needs of the present without compromising the ability of future generations to meet their own needs'*
- 14.4 The Plan is very clear in relation to addressing some of the key sustainability issues that have been identified, such as improving access and movement, housing height and densities and key issues for each estate. It has also been positively written and provides flexibility and seeks to ensure sustainable development in accordance with the NPPF.
- 14.5 The key characteristics of the natural environment, historic assets and sense of place are recognised throughout the Plan and in much of the supporting text to the policies. The Plan when read in its entirety has enough detail to ensure significant environmental and social issues or constraints must be taken into account.