

APPENDIX 3 Appraisal of policies against sustainability objectives

Strongly positive	Positive	Neutral	Negative	Strongly negative	Unknown/ Uncertain
++	+	-	x	xx	?

Note policies SB1, SB2, HN2, HN3, BE2.1, BE3 and DB1 are assessed in the main report as they have strategic alternatives.

1) Landscape - To conserve and enhance the high quality landscape character of the parish

On balance the policies in the plan are likely to have a positive effect on this objective; however, there are some policies that could have a negative effect.

Several policies could have a significant positive effect on this objective. Unsurprisingly these are mostly in the landscape, heritage and ecology sections of the plan. However, there is also a design policy (DE1) that could affect this. This is because one of the criteria in the policy seeks to ensure that the development makes a positive contribution to landscape character. Policy DB2 is also considered to have a positive effect on landscape due to the potential for improving the character of the area.

The housing policies have the potential to negatively affect this objective. Even though housing development will largely be focused within the settlement boundary there is still the potential that this could affect the wider landscape in locations where the existing boundary is open to the wider countryside. Exception sites could have a negative effect because these would be outside the settlement boundary. However, policy HN5 does seek to ensure that the scale and location of the development relates well to the existing settlement and that it has been through a sustainability appraisal. This policy could be strengthened by adding the need for a landscape character assessment to the tests in the policy. This is also the case with Policy HN6 for infill or redevelopment within the settlement boundary. Although policy HN7 relates to housing in the countryside its impact on this objective would be neutral as

it makes reference to the landscape policies in the Neighbourhood Plan. Similarly, policy HN8 has been assessed as neutral because the Orchard Close site is in the countryside and there are potential landscape impacts, but this is covered by a criterion in the policy. Policy BE2.2 has also been assessed as neutral because the site has an extant consent for a care home. There are opportunities for an alternative scheme to improve the landscape impact compared to the consented scheme, but this cannot be assumed at this stage.

Other negative effects could arise from policy BE1 as this allows development of business and employment uses outside the settlement boundary which could impact on the local landscape. SS2 has potential for a negative effect as it seeks to encourage visitors and appropriate signage. This is offset by the wording in the policy which relates to sensitively sited signage.

Some policies, such as SS1 and HN6 have the potential for a negative effect but take a balanced approach in the policy by ensuring that landscape factors are taken into account.

Policies	HN1	HN4	HN5	HN6	HN7	HN8	BE1	BE2.2	ST1	ST2	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	X	X	X	-	-	-	X	-	-	-	X	-	-	++	++	-	+
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	SS2	PO1	DE1	IDC1	DB2		
Appraisal	++	++	-	-	+	-	+	-	+	-	X	-	++	+	++		

2) Biodiversity - To protect and enhance the fauna, flora and habitats in the parish

Several of the policies in the landscape, heritage and ecology section are significantly positive in relation to this objective. Policy DE1 is positive as this suggests that design and layout should respect green corridors and the use of landscaping should contribute to biodiversity. IDC1 is also positive as green space and ecological enhancement are mentioned as priorities for infrastructure priorities. PO1 is positive because pollution has a significant impact on biodiversity.

There is one opportunity to enhance the plan. Policy SS2 refers to the use of appropriate Sustainable Urban Drainage Systems. These systems reduce flood risk but can also increase opportunities for biodiversity. This aspect could be mentioned in the plan.

The negative effects from the housing policies on this objective are in relation to windfall, exception sites and housing in the countryside (HN4, HN5 and HN7). As the location of such sites is not yet determined there is the potential for a negative effect in relation to this objective as the biodiversity designations are outside the settlement boundary. This is most likely for HN5 which refers to exception sites outside the settlement boundary. HN8 also has negative effects due its countryside location and onsite biodiversity assets. Nevertheless, other policies in the Plan (and higher level Plans) mean that the effect is likely to be minimal and no mitigation measures are suggested.

Policies	HN1	HN4	HN5	HN6	HN7	HN8	BE1	BE2.2	ST1	ST2	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	-	X	X	-	X	X	-	-	+	-	X	-	-	+	-	-	++
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	SS2	PO1	DE1	IDC1	DB2		
Appraisal	++	++	-	-	-	-	-	?	-	-	-	++	++	+	-		

3) Heritage assets and archaeology - To protect, maintain and enhance the historic environment and archaeological assets of the parish

The effect of the policies on this objective is predominantly neutral. The most positive policy is LHE3 which directly relates to the protection of historical and archaeological assets. Policy LHE2 is indirectly positive by seeking to ensure that development contributes to the special character of the village. This is also the case with policy DE1 which seeks to ensure that development has high quality design appropriate to its location. Policy DB2 have positive effects due to the opportunity to improve the impact of the Staceys Garage site on the Conservation Area and nearby Listed Buildings. Policy HN6 recognises the need to preserve and enhance the Conservation Area. Policy BE3 seeks to control development at Twyford Preparatory School as part of the site lies within the Conservation Area and states that any Master Plan for the site should include a strategy for the historic fabric and for archaeology. Finally, Policy IDC1 is positive because it identifies heritage protection as an infrastructure priority. This policy could be enhanced by identifying assets that could benefit from enhancements and not just protection.

Several of the housing policies have the potential to negatively affect heritage assets. Policies HN4 and HN5 relate to windfall and exception sites and HN8 relates to development of elderly persons facilities. All of these policies could have a negative effect on this objective as heritage assets and archaeology are located within and outside the settlement boundary. The other negative effects could be from MA2 and SS1. The former seeks to provide additional parking in the village centre which is near the Conservation Area and SD1 supports renewable energy which can have a negative impact on historic assets. The latter

policy, however, seeks to ensure that such schemes do not detract from the historic character of the surrounding area. As there are other policies in the Plan which would restrict the potential negative effect from the policies identified here no mitigation measures are proposed.

Policies	HN1	HN4	HN5	HN6	HN7	HN8	BE1	BE2.2	ST1	ST2	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	-	x	x	+	-	x	-	-	-	-	-	-	-	-	+	++	-
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	SS2	PO1	DE1	IDC1	DB2		
Appraisal	-	-	-	-	-	x	-	?	-	x	+	-	+	+	++		

4) Housing and the built environment - To provide new affordable smaller homes to meet the parishes housing need and to ensure that the design of new development respects the high quality built environment of Twyford and the rural areas of the parish

Overall there are numerous potential positive effects in relation to this objective, as well as a few negative effects. Unsurprisingly the housing policies in the Plan would be strongly positive in relation to this objective. Policies B2.2 and DB2 are uncertain because they may allow housing development but also facilitate alternative uses. Other positive policies relate to design. Policy DE1 seeks to ensure high quality design and layout for new development which would be positive in terms of the built environment. Whilst SS1 and SS2 support renewable energy and energy efficient design but alongside this seek to ensure that neither of these aims are detrimental to the quality of the built environment; making these neutral in terms of this objective.

Most of the landscape, heritage and ecology policies are negative in terms of this objective as protecting these environmental assets could restrict sites for housing. Whilst policy ST1 could have a negative effect because encouraging the provision of visitor accommodation could reduce the housing stock in the village and surrounding parish. This also applies to policy CP1 which seeks to ensure that open space is provided as part of development schemes, again potentially restricting the number of house that could be provided. Finally, policy WE1 restricts development in areas at risk of flooding. Land both outside and within the settlement boundary is within Flood Zone 3 so restricting development on such land could negatively affect the provision of new housing.

No enhancements or mitigation measures are proposed to the policies in light of the potential negative effects on this objective. The negative effects are predominantly due to restricting housing development sites to ensure that the high quality of environment of the parish is protected and enhanced whilst also protecting new development from flooding. The Plan is, therefore, seeking to provide a balanced approach to development in the parish which provides appropriate housing and protects the high quality environment.

Policies	HN1	HN4	HN5	HN6	HN7	HN8	BE1	BE2.2	ST1	ST2	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	++	++	++	++	++	++	-	?	x	-	x	-	-	x	-	x	x
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	SS2	PO1	DE1	IDC1	DB2		
Appraisal	x	x	x	-	-	-	-	-	-	-	-	-	++	-	?		

5) Accessibility - To increase the number of journeys by cycling, walking and public transport and to improve safety for pedestrians in Twyford

Several policies would make a positive contribution to this objective. The Plan has a specific section on accessibility which includes promoting sustainable forms of transport that require additional infrastructure; for example, cycle routes and cycle parking (MA1 and LHE4). It also seeks to address traffic congestion in Twyford village. This is mainly caused by traffic and non-residents accessing Twyford School and Northfields Farm/Hazeley Enterprise Park with the addition of heavy goods vehicles visiting the latter site. Policy MA4 proposes a new access road to the Enterprise Park which would divert heavy goods vehicles away from the village centre. Policy CP2 and CP3 support measures to improve the access at St Mary's Primary School.

Congestion in the village centre is also exacerbated by on street parking due to the existing car parking reaching over capacity. Policy MA4 seeks to provide additional parking spaces in the village centre as well as ensuring that existing parking is retained and full provision is made in new development. The latter is also reiterated in policy HN6.

There are only three policies that are likely to have a negative effect on this objective. These are policies which allow development outside the settlement boundary which could add to the existing traffic congestion and pressure for off street parking (HN2, HN8 ST1 and CP1). Nevertheless, where policies allow development outside the settlement boundary there are strong controls to limit the amount of development which means that there are likely to be few developments that will not be accessible to Twyford or add significantly to the congestion in the village. Hence, no mitigation measures are suggested for any of the policies in relation to this objective.

Policies	HN1	HN4	HN5	HN6	HN7	HN8	BE1	BE2.2	ST1	ST2	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	-	-	X	+	-	X	+	-	X	-	X	++	++	-	-	-	++
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	SS2	PO1	DE1	IDC1	DB2		
Appraisal	-	-	-	-	++	++	++	+	++	-	-	-	-	+	-		

6) Community - To support a vibrant and thriving community

Positive contributions to this objective are interwoven throughout the Plan and there are no policies that are likely to have negative effects. The housing policies are generally indirectly supportive of the community objective as sufficient housing, and specifically affordable housing, is essential to a vibrant and thriving community. Housing development outside the settlement boundary should benefit the local community. The same is true for the policies relating to the economy. Opportunities for employment support a vibrant and thriving community. However, the plan does not seek to provide additional employment opportunities because the present employment sites in the village currently predominantly draw people into the village rather than generating local employment which brings additional pressures such as traffic congestion to Twyford. The Plan acknowledges the community benefits that sustainable tourism can bring.

Policies CP1, CP2 and CP3 directly relate to the provision of community facilities and, therefore, support this objective. CP1 seeks to retain existing provision and to provide new facilities and open space. CP2 and CP3 relate to St Mary's Primary School and support improvements to the school; particularly improved access which is currently poor which results in traffic congestion.

Although the landscape policies primarily relate to the environmental objectives of the SA some of them also support the community objective. Policy LHE1 seeks to prevent the coalescence of Twyford with neighbouring settlements which supports the community identity and cohesion of the village. In addition, policy LHE4 protects Local Greenspaces for community use and acknowledges the importance of other informal open spaces to the community.

The policies on mobility and accessibility are indirectly positive to this objective as they seek to reduce traffic congestion, reduce the impact of traffic on the community and provide parking for the village centre to assist access to community facilities in this location. Finally, the design and infrastructure policies are likely to be positive. DE1 is indirectly positive in seeking to create high quality public realm and IDC1 lists community facilities amongst the priorities to receive finance from the Community Infrastructure Levy. Policy PO1 supports this objective due to the health benefits of reduced pollution.

As none of the policies are negative in terms of this objective no mitigation measures are proposed and no changes to the policies are required to enhance the Plan.

Policies	HN1	HN4	HN5	HN6	HN7	HN8	BE1	BE2.2	ST1	ST2	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	+	++	+	+	+	+	+	+	+	-	++	++	++	+	-	-	++
Alternative																	
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	SS2	PO1	DE1	IDC1	DB2		
Appraisal	-	-	-	-	+	+	+	-	-	-	-	+	+	++	-		

7) Water - To protect the area from flooding and the impact on water quality in the groundwater protection zone

The most significantly positive policies in terms of this objective are in the Water and Environment section. This section of the Plan could be strengthened by referring to the Groundwater Protection Zone which covers the whole parish (zone 1, 1c and 2).

All of the design and infrastructure policies are also positive (in some cases these are significantly positive) because they either seek to provide measures that reduce flood risk or do this indirectly through supporting renewable sources of energy which reduce greenhouse gas emissions which contribute to climate change. Climate change is likely to increase the flood risk in Twyford. The latter also applies to MA1 and MA5. These are indirectly positive as providing the infrastructure for walking and cycling would reduce greenhouse gas emissions. Policy PO1 is positive as reducing pollution would improve water quality.

HN5 is positive as it ensures that exception sites are subject to a site specific SA which is likely to include flood risk and flood protection. However, given the risk from flooding in the parish this policy could be strengthened by adding wording to the supporting text that flooding should be a part of the sustainability appraisal process.

LHE1 would have a positive effect on this objective as some of the protected gaps also fall within land designed by Flood Zone 3. Hence, this would provide a further restriction on development in this area. Likewise LHE4 would make a positive contribution as it promotes open spaces and green infrastructure which can assist with delaying and reducing surface water run-off. This indirect affect also applies to LHE6 which seeks to retain and enhance biodiversity.

Several of the policies could have a negative effect on this objective. However, none are likely to be significantly negative. HN1, HN2 and HN3 could have a negative effect on this objective as these make provision for additional housing which could either make the current flood risk in Twyford worse or, depending on the location, the new houses could be at risk of flooding.

Development outside the built up area boundary could affect water quality by impacting on the groundwater source protection zone. This relates to policies HN7, HN8, ST1 and BE1.

HN6 has a list of criteria for assessing infill or redevelopment within the settlement boundary. This could be mitigated by adding consideration of flood risk to the criteria or cross reference to WE1.

MA2 is negative as this seeks to provide additional parking which could not only encourage car use but also an increase in hard surfaces which if poorly located could increase flooding issues from surface water run-off. This could be mitigated by changes to the text or policy which makes reference to the use of permeable surface; depending on the location of the additional parking area.

Policies	HN1	HN4	HN5	HN6	HN7	HN8	BE1	BE2.2	ST1	ST2	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	x	x	+	x	x	x	x	-	x	-	-	-	-	+	-	-	+
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	SS2	PO1	DE1	IDC1	DB2		
Appraisal	-	+	++	++	+	x	-	?	+	+	++	++	+	++	-		

8) Economy - To promote the provision of local employment

Policies throughout the Plan are likely to have a positive effect in relation to this objective. Many of these are indirectly supportive. More housing with mixed tenure, including the provision of affordable housing, would support the local economy. Sustainable tourism (which is supported in policies ST1 and ST2) could provide local employment. Policies MA1, MA2 and MA5 seek to secure transport and infrastructure improvements (including additional parking). This would be indirectly positive towards this objective as such improvements could provide improved access for people living in the parish to access local employment.

The Business and Employment policies are slightly negative as these reflect the approach in the Plan to restrict current employment uses as most employees are not residents of the parish. This is causing additional pressure on the village from increased traffic. However, the policies do seek to retain existing employment. As the desire to restrict additional employment is a strategic aim of the Plan no mitigation measures are proposed. However, this aspect of the Plan would need to be monitored to ensure that restrictive approach is not being detrimental to the local economy. Policies B2.2 and DB2 are shown as uncertain because they could be retained as employment or could be redeveloped for alternative uses.

Policies	HN1	HN4	HN5	HN6	HN7	HN8	BE1	BE2.2	ST1	ST2	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	+	+	+	+	-	+	x	?	++	+	-	-	-	-	-	-	-
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	SS2	PO1	DE1	IDC1	DB2		
Appraisal	-	-	-	-	+	+	-	-	+	-	-	-	-	+	?		