



East Cambridgeshire
District Council

**Sustainability
Appraisal and
Strategic
Environmental
Assessment of the
Local Plan to 2036**

Proposed Submission
Local Plan

Addendum Report

August 2018

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1 Introduction

1.1 On 30 July 2018, the examining Inspector issued 'Initial Findings' (ref ED031) in respect of the East Cambridgeshire Local Plan.

1.2 One such finding was as follows:

Sustainability Appraisal

I have carefully considered the Sustainability Appraisal (SA) that accompanied the submission plan. However, the SA has not tested sites which benefit from planning permission and have been subsequently allocated within the development plan. Whilst I understand that such sites could be developed and have been considered as appropriate for development, in the interests of completeness these should be the subject of sustainability appraisal.

In addition, I share the concerns raised by Historic England relating to the limited evidence which has been used to inform the SA of sites at both Kennett and Swaffham Prior. As such, the Council should provide further clarification as to how the historic evidence has been used to inform their sustainability appraisal.

1.3 As a consequence of the above finding, the Council has prepared this addendum report, to address the matters raised above. Ultimately, the final SA Report which the Council will publish, post adoption of the Local Plan, will merge the information in part 2 of this Report into the November 2017 full SA Report (ref CD11A). However, for ease of addressing (and demonstrating how we have addressed) the Inspector's request, it was deemed appropriate to prepare this addendum report rather than attempt to republish a full and updated SA Report at this point in time.

1.4 For a comprehensive explanation of the SA process and how the SA has been undertaken, please refer to the main November 2017 SA Report. However, for ease of reference, Tables 3 and 4 of the November 2017 report are set out on the following two pages, as these are particularly useful in interpreting the information set out in this addendum report.

Table 3 - Sustainability Framework (as extracted from the November 2017 SA Report – ref CD11A)

SA Topic	SA Objective	Decision-making Criteria
1 Land and water resources	1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings	<ul style="list-style-type: none"> • Will it use land that has been previously developed? • Will it use land efficiently? • Will it protect and enhance the best and most versatile agricultural land?
	1.2 Reduce the use of non-renewable resources including energy sources	<ul style="list-style-type: none"> • Will it reduce energy consumption? • Will it increase the proportion of energy needs being met from renewable sources?
	1.3 Limit water consumption to levels supportable by natural processes and storage systems	<ul style="list-style-type: none"> • Will it reduce water consumption? • Will it conserve ground water resources?
2 Biodiversity and geodiversity	2.1 Avoid damage to designated statutory and non statutory sites and protected species	<ul style="list-style-type: none"> • Will it protect sites designated for nature conservation interest? • Will it mitigate against any harm caused by proposed development?
	2.2 Maintain and enhance the range and viability of characteristic habitats and species	<ul style="list-style-type: none"> • Will it conserve species, reverse declines, help to enhance diversity? • Will it reduce habitat fragmentation? • Will it help achieve Biodiversity Action Plan targets?
	2.3 Improve opportunities for people to access and appreciate wildlife and wild places	<ul style="list-style-type: none"> • Will it improve access to wildlife, and wild places? • Will it maintain or increase the area of high-quality green space? • Will it promote understanding and appreciation of wildlife?
3 Landscape, townscape and heritage assets	3.1 Avoid damage to areas and sites designated for their historic interest, and protect their settings	<ul style="list-style-type: none"> • Will it protect or enhance sites, features of areas of historical, archaeological, or cultural interest and their settings?
	3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character	<ul style="list-style-type: none"> • Will it maintain and enhance the diversity and distinctiveness of landscape and townscape character? • Will it protect and enhance open spaces of amenity and recreational value? • Will it maintain and enhance the character of settlements?
	3.3 Create places, spaces and buildings that work well, wear well and look good	<ul style="list-style-type: none"> • Will it improve the satisfaction of people with their neighbourhoods as places to live? • Will it lead to developments built to a high standard of design?
4 Climate change and pollution	4.1 Reduce emissions of greenhouse gases and other pollutants (including air, water, soil, noise, vibration and light)	<ul style="list-style-type: none"> • Will it reduce emissions of greenhouse gases? • Will it improve air quality? • Will it reduce traffic volumes? • Will it support travel by means other than the car? • Will it reduce levels of noise? • Will it reduce or minimise light pollution? • Will it reduce water pollution?
	4.2 Minimise waste production and support the recycling of waste products	<ul style="list-style-type: none"> • Will it reduce household waste? • Will it increase waste recovery and recycling? • Will it reduce waste from other sources?
	4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)	<ul style="list-style-type: none"> • Will it minimise risk to people and property from flooding, storm events or subsidence? • Will it improve the adaptability of buildings to changing temperatures?
5 Healthy communities	5.1 Maintain and enhance human health	<ul style="list-style-type: none"> • Will it reduce death rates? • Will it encourage healthy lifestyles?
	5.2 Reduce and prevent crime, and reduce the fear of crime	<ul style="list-style-type: none"> • Will it reduce actual levels of crime? • Will it reduce fear of crime?
	5.3 Improve the quantity and quality of publicly accessible open space	<ul style="list-style-type: none"> • Will it increase the quantity and quality of publicly accessible open space?

SA Topic	SA Objective	Decision-making Criteria
6 Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	<ul style="list-style-type: none"> • Will it improve accessibility to key local services and facilities? • Will it improve accessibility by means other than the car? • Will it support and improve community and public transport?
	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	<ul style="list-style-type: none"> • Will it improve relations between people from different backgrounds or social groups? • Will it reduce poverty and social exclusion in those areas most affected? • Will it promote accessibility for all members of society?
	6.3 Ensure all groups have access to decent, appropriate and affordable housing	<ul style="list-style-type: none"> • Will it support the provision of a range of housing types and sizes to meet the identified needs of all sectors of the community? • Will it reduce the number of unfit homes? • Will it meet the needs of the travelling community?
	6.4 Encourage and enable the active involvement of local people in community activities	<ul style="list-style-type: none"> • Will it increase the ability of people to influence decisions? • Will it encourage community engagement?
7 Economic activity	7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence	<ul style="list-style-type: none"> • Will it encourage business development? • Will it improve the range of employment opportunities? • Will it improve access to employment / access to employment by means other than the car? • Will it encourage the rural economy and diversification?
	7.2 Support appropriate investment in people, places, communications and other infrastructure	<ul style="list-style-type: none"> • Will it improve the level of investment in key community services and infrastructure? • Will it support provision of key infrastructure? • Will it improve access to education and training, and support provision of skilled employees?
	7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy	<ul style="list-style-type: none"> • Will it improve business development and enhance competitiveness? • Will it support Cambridgeshire's lead role in research and technology based industries, higher education and research? • Will it support sustainable tourism? • Will it protect the shopping hierarchy, supporting vitality and viability?

Table 4 – Key to appraisal symbols (as extracted from the November 2017 SA Report – ref CD11A)

Symbol	Likely effect upon the SA Objective
+++	Strong and significant beneficial impact
++	Potentially significant beneficial impact
+	Policy or proposal supports this objective although it may only have a minor beneficial impact
~	Policy or proposal has no impact or effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the assessment at this stage
-	Policy or proposal appears to conflict with the objective and may result in adverse impacts
--	Potentially significant adverse impact
---	Strong and significant adverse impact

2.0 Evaluate the likely effects of settlement policies and the sites submitted for allocation

2.1 Appendix C of the November 2017 report assessed how each of the sites put forward as 'suggested sites' perform against the sustainability criteria.

2.2 However, what that Appendix C did not do was SA any site with planning permission. It did not do so because, as explained at paragraph 4.4 of that Report:

4.4. Where sites are already 'committed' (e.g. with planning permission) these have not been appraised as the assumption is that such sites will be delivered irrespective of what the new Local Plan will state, and that they have already been appraised and found suitable, from a sustainability perspective, by the decision maker which has subsequently resulted in the site being 'committed'. It would not be a reasonable or practical measure to undertake further appraisal of such sites.

2.3 Subsequently, the Inspector has disagreed with this stance. Instead, the Inspector is seeking such committed sites to be SA'd in exactly the same way as non-committed sites. The above paragraph will therefore need amending in the final SA Report (post plan adoption).

2.4 The following part of this report undertakes the task sought by the Inspector. All sites have been grouped by their settlement. Maps showing the locations of each site in are included in the Site Assessment Evidence Report which is available for view on our website.

Settlement: Burwell**Sites with Consent**

SA Objective	Local Plan		
	BUR.H1 (05/04) Land at Newmarket Rd	BUR.PH1 (05/10) Stanford Park, Weirs Rd	BUR.M1 (05/06) Former DS site, Reach Rd
1.1 Undeveloped land	--	--	++
1.2 Energy use	?	?	?
1.3 Water consumption	~	~	~
2.1 Nature sites and species	~	~	~
2.2 Biodiversity	~	~	~
2.3 Access to wildlife	~	~	+
3.1 Historical assets	--	?	-
3.2 Landscape / townscape character	-	-	-
3.3 Design and layout	+	+	+
4.1 Pollutants	?	?	?
4.2 Waste production	~	~	~
4.3 Climate change	~	~	-
5.1 Health	++	~	~
5.2 Crime	?	?	?
5.3 Open space	+	+	+
6.1 Accessibility	+	-	+
6.2 Inequalities	~	~	~
6.3 Housing need	+++	+++	++
6.4 Community involvement	~	~	~
7.1 Access to work	~	~	++
7.2 Investment	+	+	+
7.3 Local economy	+	+	+

Commentary

Sites BUR.H1, BUR.PH1 and BUR.M1 all have consent. Site BUR.H1 is a greenfield site and although there are no historic assets on site there is a grade II listed Mill to the west of the site. Development on this site will need to protect and enhance the listed building and its settings and should be of high quality design. The site will provide a range of housing to meet local needs and a sport hub will be created on site and this will provide health benefits to local community. BUR.PH1 will cater for local residents that seek caravan accommodation although it is located outside the settlement on a greenfield site. Mixed-use site (BUR.M1) will provide housing and employment opportunities for residents and would use brownfield site. However, there are County Wildlife Site and Archaeological assets on site which will need to be mitigated against.

Settlement: Cheveley**Sites with Consent**

	Local Plan	
SA Objective	CHV.H1 (06/02)	
1.1 Undeveloped land	--	
1.2 Energy use	?	
1.3 Water consumption	~	
2.1 Nature sites and species	~	
2.2 Biodiversity	~	
2.3 Access to wildlife	~	
3.1 Historical assets	--	
3.2 Landscape / townscape character	~	
3.3 Design and layout	?	
4.1 Pollutants	?	
4.2 Waste production	~	
4.3 Climate change	~	
5.1 Health	~	
5.2 Crime	?	
5.3 Open space	~	
6.1 Accessibility	-	
6.2 Inequalities	~	
6.3 Housing need	++	
6.4 Community involvement	~	
7.1 Access to work	-	
7.2 Investment	+	
7.3 Local economy	+	

Commentary

Site CHV.H1 has consent. The greenfield site will provide homes for local residents although on a greenfield site. There are some historic assets on site that will require mitigation. The site is away from some services and from employment. However new housing will help to maintain local services and provide investment.

Settlement: Ely

Local Plan				
SA Objective	ELY.H1 10/30,	ELY.H2 10/31	ELY.H3 10/32	ELY.L1 10/20
1.1 Undeveloped land	--	++	++	+
1.2 Energy use	?	?	?	?
1.3 Water consumption	~	~	~	~
2.1 Nature sites and species	~	~	~	~
2.2 Biodiversity	~	~	~	~
2.3 Access to wildlife	~	~	~	~
3.1 Historical assets	?	~	~	~
3.2 Landscape / townscape character	-	~	~	-
3.3 Design and layout	?	?	?	?
4.1 Pollutants	?	?	?	?
4.2 Waste production	~	~	~	~
4.3 Climate change	~	~	~	~
5.1 Health	~	~	~	++
5.2 Crime	?	?	?	?
5.3 Open space	~	~	~	~
6.1 Accessibility	-	+	+	-
6.2 Inequalities	~	~	~	~
6.3 Housing need	++	++	++	~
6.4 Community involvement	~	~	~	~
7.1 Access to work	-	+	~	+
7.2 Investment	+	+	+	+
7.3 Local economy	+	+	+	+

Commentary

Sites ELY.H1-3 and Ely.L1 have consent. Site ELY.H1 is located adjacent to the City on undeveloped land. Housing will be provided and this also will help the economy. A slightly remote location will make it more difficult to access services and employment. ELY.H2 is a brownfield site located within Ely. Facilities are accessible from the site and employment is nearby. Brownfield site ELY.H3 is under construction as a retirement home complex. Facilities and employment are near to the site. The leisure facility (ELY.L1) on a brownfield site will provide health and employment benefits for local residents. However, it could have negative impact on the setting of the City.

Settlement: Fordham

Local Plan		
SA Objective	FRD.H3 Land off Station Rd	
	11/28	
1.1 Undeveloped land	--	
1.2 Energy use	?	
1.3 Water consumption	~	
2.1 Nature sites and species	~	
2.2 Biodiversity	~	
2.3 Access to wildlife	~	
3.1 Historical assets	?	
3.2 Landscape / townscape character	-	
3.3 Design and layout	?	
4.1 Pollutants	?	
4.2 Waste production	~	
4.3 Climate change	~	
5.1 Health	~	
5.2 Crime	?	
5.3 Open space	~	
6.1 Accessibility	-	
6.2 Inequalities	~	
6.3 Housing need	++	
6.4 Community involvement	~	
7.1 Access to work	+	
7.2 Investment	+	
7.3 Local economy	+	

Commentary

Site FRD.H3 has consent. The site is located on greenfield site on the edge of a village but next to an employment site. Housing needs of the village will be provided along with investment in the local economy.

Settlement: Isleham

Local Plan			
SA Objective	13/09	ISL.H2 5a Fordham Rd	13/07
			ISL.H3 Hall Barn Rd
1.1 Undeveloped land		--	--
1.2 Energy use		?	?
1.3 Water consumption		~	~
2.1 Nature sites and species		~	~
2.2 Biodiversity		~	~
2.3 Access to wildlife		~	~
3.1 Historical assets		?	?
3.2 Landscape / townscape character		-	-
3.3 Design and layout		?	?
4.1 Pollutants		?	?
4.2 Waste production		~	~
4.3 Climate change		~	~
5.1 Health		~	~
5.2 Crime		?	?
5.3 Open space		~	~
6.1 Accessibility		+	+
6.2 Inequalities		~	~
6.3 Housing need		++	++
6.4 Community involvement		~	~
7.1 Access to work		-	-
7.2 Investment		+	+
7.3 Local economy		+	+

Commentary

Sites ISL.H2 and ISL.H3 have consent.

ISL.H2 is a greenfield site on the edge of the village within walking distance of local services. Housing need and investment provided for the local community but as it is on the edge of the village it could impact on the landscape or townscape setting. ISL.H3 is a vacant greenfield site on the approach to the village with facilities within walking distance. Housing need and investment provided for the local community but as it is on the edge of the village it could impact on the landscape or townscape setting. .

Settlement: Little Thetford

Local Plan		
SA Objective	LTT.H2 Caravan Park Two Acres (17/04)	
1.1 Undeveloped land	--	
1.2 Energy use	?	
1.3 Water consumption	~	
2.1 Nature sites and species	~	
2.2 Biodiversity	~	
2.3 Access to wildlife	~	
3.1 Historical assets	?	
3.2 Landscape / townscape character	-	
3.3 Design and layout	?	
4.1 Pollutants	?	
4.2 Waste production	~	
4.3 Climate change	~	
5.1 Health	~	
5.2 Crime	?	
5.3 Open space	+	
6.1 Accessibility	-	
6.2 Inequalities	~	
6.3 Housing need	++	
6.4 Community involvement	~	
7.1 Access to work	-	
7.2 Investment	+	
7.3 Local economy	+	

Commentary

Site LTT.H2 has consent. This is a greenfield site is next to existing caravan site on the edge of the village. It could have an impact on the landscape due to its location and would have limited employment opportunity nearby.

Settlement: Littleport

SA Objective	Local Plan		
	LIT H2	LIT H3	LIT H4
1.1 Undeveloped land	++	--	--
1.2 Energy use	?	?	?
1.3 Water consumption	~	~	~
2.1 Nature sites & species	~	~	~
2.2 Biodiversity	~	~	~
2.3 Access to wildlife	~	~	~
3.1 Historical assets	?	?	?
3.2 Landscape / townscape character	~	~	~
3.3 Design and layout	?	?	?
4.1 Pollutants	-	?	?
4.2 Waste production	~	~	~
4.3 Climate change	~	~	~
5.1 Health	~	~	~
5.2 Crime	?	?	?
5.3 Open space	~	~	~
6.1 Accessibility	+	+	+
6.2 Inequalities	~	~	~
6.3 Housing need	++	++	++
6.4 Community involvement	~	~	~
7.1 Access to work	+	+	+
7.2 Investment	+	+	+
7.3 Local economy	+	+	+

Commentary

Sites LIT.H2-4 have consent.

LIT.H2 is a brownfield site (former goods yard) near the train station and so could be subject to noise pollution. The site would cater for housing needs with facilities nearby. Employment opportunity is available within the settlement and in other locations can be reached via train. A greenfield site (LIT.H3) not very far from centre of the settlement with a number of facilities. Employment opportunities are available within the settlement or nearby. LIT.H4 is a greenfield site not far from centre of the settlement where facilities are located. The site is mostly surrounded by residential development and employment opportunities are available nearby.

Settlement: Newmarket Fringe

Local Plan		
SA Objective	NFR.H1 (35/04) St John's Ave	
1.1 Undeveloped land	--	
1.2 Energy use	?	
1.3 Water consumption	~	
2.1 Nature sites and species	~	
2.2 Biodiversity	~	
2.3 Access to wildlife	~	
3.1 Historical assets	?	
3.2 Landscape / townscape character	-	
3.3 Design and layout	?	
4.1 Pollutants	?	
4.2 Waste production	~	
4.3 Climate change	~	
5.1 Health	~	
5.2 Crime	?	
5.3 Open space	~	
6.1 Accessibility	+	
6.2 Inequalities	~	
6.3 Housing need	++	
6.4 Community involvement	~	
7.1 Access to work	+	
7.2 Investment	+	
7.3 Local economy	+	

Commentary

Site NFR.H1 has consent. A greenfield site at Newmarket with facilities nearby. The site would cater the housing needs and provide investment. Employment facilities are nearby in Newmarket and other destination could be available via train station nearby.

Settlement: Soham

	Local Plan						
SA Objective	SOH.H3	SOH.H7	SOH H8	SOH.H12	SOH.H13	SOH.H14	SOH.H15
1.1 Undeveloped land	--	--	--	--	++	+-	--
1.2 Energy use	?	?	?	?	?	?	?
1.3 Water consumption	~	~	~	~	~	~	~
2.1 Nature sites and species	~	~	~	~	~	~	~
2.2 Biodiversity	~	~	~	~	~	~	~
2.3 Access to wildlife	~	~	~	~	~	~	~
3.1 Historical assets	-	-	?	-	?	-	?
3.2 Landscape / townscape character	~	~	~	~	~	~	~
3.3 Design and layout	-	?	?	?	?	?	?
4.1 Pollutants	?	?	?	?	?	?	?
4.2 Waste production	~	~	~	~	~	~	~
4.3 Climate change	~	~	~	~	~	~	~
5.1 Health	~	~	~	~	~	~	~
5.2 Crime	?	?	?	?	?	?	?
5.3 Open space	~	~	~	~	~	~	~
6.1 Accessibility	+	+	+	+	+	++	+
6.2 Inequalities	~	~	~	~	~	~	~
6.3 Housing need	++	++	++	++	++	++	++
6.4 Community involvement	~	~	~	~	~	~	~
7.1 Access to work	~	+	-	-	-	+	-
7.2 Investment	+	+	+	+	+	+	+
7.3 Local economy	+	+	+	+	+	+	+

Commentary

Sites SOH.H3, H7, H8, H12-15 have consent.

SOH.H3 is a greenfield site, not far from the centre of the settlement, with some employment facilities nearby. The site is within the conservation area and the development could potentially impact on the conservation area and its setting. SOH.H7 greenfield site is currently under construction on the edge of the settlement. Some facilities are nearby and other are within walking distance. Some employment opportunities are nearby. The site partly lies within the Mineral Safeguard Area and on the edge of the conservation area. SOH.H8 is a greenfield site located on the edge of the settlement with some facilities nearby. A range of housing will be provided on the site and this will help the local economy by creating new facilities or making the existing facilities more sustainable. Employment sites are not immediately nearby. SOH.12 site is totally surrounded by residential development, with conservation area and listed building nearby and their settings will need to be taken into consideration. Access to work is uncertain from this site although some employment opportunities may be available in the settlement. SOH.13 is a small brownfield site next to a primary school. Some facilities are nearby and others are within walking distance. SOH.H14 is a mixed site backing on to High Street. Most of the facilities are within walking distance and employment opportunity are nearby. The site is in the conservation area and there are listed buildings in the vicinity. SOH.H15 is a greenfield site located on the edge of the settlement with some facilities nearby. A range of housing will be provided on the site and this will help the local economy by creating new facilities or making the existing facilities more sustainable. Employment sites are not immediately nearby.

Settlement: Soham			
	Alternatives		
SA Objective	23/09	23/10	
1.1 Undeveloped land	(see SOH.H8)	(see SOH.H8)	
1.2 Energy use			
1.3 Water consumption			
2.1 Nature sites and species			
2.2 Biodiversity			
2.3 Access to wildlife			
3.1 Historical assets			
3.2 Landscape / townscape character			
3.3 Design and layout			
4.1 Pollutants			
4.2 Waste production			
4.3 Climate change			
5.1 Health			
5.2 Crime			
5.3 Open space			
6.1 Accessibility			
6.2 Inequalities			
6.3 Housing need			
6.4 Community involvement			
7.1 Access to work			
7.2 Investment			
7.3 Local economy			
Commentary			
See SOH.H8			

Settlement: Stretham

Settlement: Stretham		
	Alternatives	
SA Objective	25/04, 25/05, 25/06	
1.1 Undeveloped land	See STR.H1 (25/07) SA	
1.2 Energy use		
1.3 Water consumption		
2.1 Nature sites and species		
2.2 Biodiversity		
2.3 Access to wildlife		
3.1 Historical assets		
3.2 Landscape / townscape character		
3.3 Design and layout		
4.1 Pollutants		
4.2 Waste production		
4.3 Climate change		
5.1 Health		
5.2 Crime		
5.3 Open space		
6.1 Accessibility		
6.2 Inequalities		
6.3 Housing need		
6.4 Community involvement		
7.1 Access to work		
7.2 Investment		
7.3 Local economy		

Commentary

STR.H1 combines a number of sites (25/04-06), including existing consents and commenced development. The allocation seeks to provide a single, coherent allocation, and provides additional development. The development is a community-led scheme by the local Community Land Trust, and therefore scores highly positively for community involvement. Policy Stretham4 makes CLT development a policy requirement, improves accessibility and makes provision for a cemetery, thereby contributing to the village's infrastructure.

Settlement: Witcham

		Local Plan
SA Objective		WTM.H1 33/01
1.1 Undeveloped land		++
1.2 Energy use		?
1.3 Water consumption		~
2.1 Nature sites and species		~
2.2 Biodiversity		~
2.3 Access to wildlife		~
3.1 Historical assets		?
3.2 Landscape / townscape character		-
3.3 Design and layout		?
4.1 Pollutants		?
4.2 Waste production		~
4.3 Climate change		~
5.1 Health		~
5.2 Crime		?
5.3 Open space		~
6.1 Accessibility		-
6.2 Inequalities		~
6.3 Housing need		++
6.4 Community involvement		~
7.1 Access to work		-
7.2 Investment		+
7.3 Local economy		+

Commentary

Site WTM.H1 has consent. This is a brownfield site currently used for employment. The village has very limited facilities and employment opportunities but Ely is nearby. This development caters for local housing needs and uses brownfield site within the village boundary.

Settlement: Witchford

Local Plan			
SA Objective	WFD.H3	WFD.H4	34/09 (forms parts of WFD.H1)
1.1 Undeveloped land	- -	- -	See SA of site WFD.H1
1.2 Energy use	?	?	
1.3 Water consumption	~	~	
2.1 Nature sites and species	~	~	
2.2 Biodiversity	~	~	
2.3 Access to wildlife	~	~	
3.1 Historical assets	?	?	
3.2 Landscape / townscape character	-	-	
3.3 Design and layout	?	?	
4.1 Pollutants	?	?	
4.2 Waste production	~	~	
4.3 Climate change	~	~	
5.1 Health	~	~	
5.2 Crime	?	?	
5.3 Open space	~	~	
6.1 Accessibility	-	-	
6.2 Inequalities	~	~	
6.3 Housing need	++	++	
6.4 Community involvement	~	~	
7.1 Access to work	-	-	
7.2 Investment	+	+	
7.3 Local economy	+	+	

Commentary

Sites WFD.H3-4 have consent. The greenfield site WFD.H3 is located on the edge of the village with limited facilities nearby. A range of housing will be provided on the site and this will help the local economy by creating new facilities or making the existing facilities more sustainable. Employment sites are not immediately nearby and could involve commuting by car. Could have impact on the landscape. The site WFD.H4 is smaller site near WFD.H3 and has similar commentary as site WFD.H3.

Site 34/09 has consent. See commentary on WFD.H1, which is a slightly larger allocated site.

3.0 Further clarification as to how the historic evidence has been used to inform the sustainability appraisal of sites at both Kennett and Swaffham Prior

- 3.1 The historic evidence has been carefully considered for all sites proposed for allocation, including the two sites referred. A clear and consistent process was followed as part of assessing all sites, including the stage involving SA.
- 3.2 With specific reference to the historic environment (this being the matter requested by the Inspector), the process was as follows:
- 3.3. When a site was submitted as part of the 'Call for Sites' process, we subsequently consulted various bodies for their comment before deciding the suitability of the site. For historic environment, relevant authorities were:
 - East Cambridgeshire District Council's own Conservation Team
 - Cambridgeshire County Council; and
 - Historic England.
- 3.3 East Cambridgeshire Conservation Team provided local context for a site and its potential impact on the historic built environment such as conservation area, listed buildings, etc. Guidance was given on any mitigation measures needed to reduce or eliminate any adverse impact.
- 3.4 Information was provided by Cambridgeshire County Council, particularly in relation to archaeological matters for a site, but potentially other useful information.
- 3.5 Historic England provided useful information and commentary on historic environment matters for a large number of sites.
- 3.6 In addition, officers preparing the Local Plan visited all sites that were submitted. Photographs were taken to provide additional information on the site and its settings. Such visits helped to understand any historic environment comments made by other parties, and, potentially, could result in new issues which need investigating.
- 3.7 Sites at Kennett and Swaffham Prior were no exception to the approach described above (3.3-3.6).
- 3.8 All such information derived from the above process assisted in formulating the evidence as summarised in the Site Assessment Evidence Report (ref PE13), especially parts 7f and 7g of that Report.
- 3.9 All of this information, evidence and knowledge in relation to the historic environment subsequently informed the SA process for all sites, particularly when appraising each site against SA Objectives 3.1 to 3.3. i.e. the 'score' awarded to each site, under the SA process, was informed by such evidence, and potentially 'negative' scores were awarded to some sites because of the potential for harm to the historic environment.
- 3.10 The historic environment is but one of the key issues to be considered along with all other matters in determining whether a site should be allocated. Where a site is to be allocated, but there is the potential for harm to the historic environment (as highlighted by the SA and/or Site Evidence Report), then mitigation measures may be necessary, and, accordingly, policy requirements may need to be put in place to ensure necessary mitigation takes place in order to reduce to a satisfactory level, or remove completely, the impact of the development on the historic environment.
- 3.8 For Kennett and Swaffham Prior sites, impacts on the historic environment were identified in the SA. The Council's response to Q5, at Stage 1, is worth repeating here:

Kennett site (KEN.M1): the SA Report (p157) identifies this site as having a ‘-’ rating against Objective 3.1. As explained in table 4 on page 11, this notation is defined as “Potentially significant adverse impact.”

Thus, the SA is clearly flagging up a concern, in relation to the historic environment, for this site. The ‘commentary’ at the bottom of p157 reinforces this point: *“There are historic assets on site that would need to mitigate against.”*

However, the SA Report goes on to appraise Policy Kennett4, which is the detailed policy for the implementation of site KEN.M1. That policy is awarded a ‘+’ rating, which is defined on page 11 as meaning “Policy or proposal supports this objective although it may only have a minor beneficial impact”. The commentary notes that Policy Kennett4 “provides requirements to mitigate against potential effects on a range of designated sites”, which includes the designated scheduled monument.

The reason why Kennett4 is, appropriately, scored ‘positively’ is because of the explicit reference in the policy that development on the site should:

“1. Provide appropriate protection to Howe Hill Bowl Barrow Scheduled Monument in accordance with policy LP27 and national policy;”

Thus, the SA and the Local Plan have done what they are supposed to do: the SA has highlighted an issue with the historic environment, the policy wording in the plan has responded in order to mitigate the matter, and the SA acknowledges that mitigation.

Whilst here is not the place to debate the merits of whether the site should be allocated or not (on which, the impact on the historic environment, taking account of the mitigations set out, is only one of a number of factors to determine such a decision), there appears no question that a proper SA of the matter, in respect of the historic environment and site KEN.M1, has been undertaken.

Swaffham Prior site (SWP.H1): the SA Report (p207) identifies this site as having a ‘-’ rating against Objective 3.1. As explained in table 4 on page 11, this notation is defined as “Policy or proposal appears to conflict with the objective and may result in adverse impacts.”

Thus, the SA is clearly flagging up a concern, in relation to the historic environment, for this site. The ‘commentary’ at the bottom of p207 reinforces this point: *“SWP.H1 could have limited impact on the conservation area and views of the church nearby”.*

The SA Report goes on to appraise Policy Swaffham Prior5, which is the detailed policy for the implementation of site SWP.H1. It is here that an error in the SA might be apparent, because it continues to award the site a ‘-’ scoring, despite the commentary at the bottom of p207 stating “Policy Swaffham Prior5 mitigates issues arising”.

In terms of the historic environment, that commentary appears sound, because Policy Swaffham Prior5 includes the following bullet point:

“a. Have particular regard to the scale, height, design and massing of buildings, in order to preserve and where opportunities arise enhance the conservation area and the listed buildings nearby”

The above policy wording was included in the Local Plan as a direct response to the findings of the SA for this site (i.e. the ‘-’ rating). What the SA should then have done is identify a ‘+’ rating for policy Swaffham Prior5 under objective 3.1, and it should have done so because the policy makes a strong commitment to ensuring development on the site takes account of historic environment matters.

The Council apologise for this error in the SA, and proposes to rectify the scoring prior to the final

SA being published.

Notwithstanding this error, and putting aside a wider discussion about the merits of the site (on which, the impact on the historic environment, taking account of the mitigations set out, is only one of a number of factors to determine such a decision), the Council is confident that the ongoing SA preparation directly influenced plan content, as it should do so, and this is reflected in the policy wording of Swaffham Prior5.

- 3.9 Overall, it was considered that both sites could be sensitively developed if mitigation measures were in place to minimise the impact on the historic environment (or, potentially, enhance the historic environment). This is clearly and appropriately discussed in the SA report (CD 11A), and is clearly addressed in the policy requirements for those two sites.
- 3.9 Thus, to answer the specific question set by the Inspector (*'the Council should provide further clarification as to how the historic evidence has been used to inform their sustainability appraisal'*), this Addendum Report has provided such clarification by explaining:
- How evidence has been gathered;
 - How such evidence was collated, summarised and published;
 - How that evidence went on to inform the SA of the specific sites;
 - How the SA identified historic environment concerns;
 - How mitigations measures (i.e. policy wording) were subsequently prepared.
- 3.10 The Council does not, therefore, share the view that limited evidence was used to inform the SA of sites at both Kennett and Swaffham Prior. Rather, a good deal of evidence, on a proportionate basis, was used to inform both the SA and their site selection, and the published reports illustrate this very clearly.
- 3.11 Ultimately, it is a judgement matter, when taking evidence as a whole into account, as to whether a site should or should not be allocated; and if it is to be allocated, whether appropriate policy / mitigation measures are necessary. But that judgement is for a separate consideration – it is not for the SA Report to make that decision. From an SA perspective, the SA has been done entirely appropriately, and based on sound evidence gathering.