



East Cambridgeshire  
District Council

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**Sustainability  
Appraisal and  
Strategic  
Environmental  
Assessment of the  
Local Plan to 2031**

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Local Plan Single Issue  
Review - Sustainability  
Appraisal

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December 2021

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# 1. Non-technical summary

## 1.1 Introduction

- 1.1.1 This report forms the Sustainability Appraisal (SA) undertaken for the second consultation version of the Single Issue Review of the East Cambridgeshire Local Plan adopted in 2015.
- 1.1.2 The report has been produced alongside the council's emerging Single Issue Review Local Plan and is being published for consultation at the same time. This is to provide the public and statutory bodies with an opportunity to express their opinions on the SA report, which can also be used as a reference point in commenting on the Local Plan.
- 1.1.3 The deadline for comments on the Local Plan and this SA report is 7th February 2022. Full details about the consultation process are available on the Council's website at <http://www.eastcambs.gov.uk/local-development-framework/local-plan-review>.

## 1.2 East Cambridgeshire Local Plan - Single Issue Review (of its 2015 Local Plan)

- 1.2.1 East Cambridgeshire District Council is undertaking a narrowly focused Single Issue Review (SIR) of its adopted Local Plan. This document outlines the scope of the review, the proposals and how you can be involved in helping us with this SIR.
- 1.2.2 The purpose of the SIR is to partially replace a very small part of the Local Plan adopted in April 2015. The intention is for the vast majority of the Local Plan (2015) to remain unaltered and remain part of the development plan for East Cambridgeshire.
- 1.2.3 Earlier in 2021, consultation took place on the initial proposal of the Local Plan. After giving due consideration to the comments made, revised version of document was produced for this second round consultation. This SA is to appraise this version of the emerging SIR.

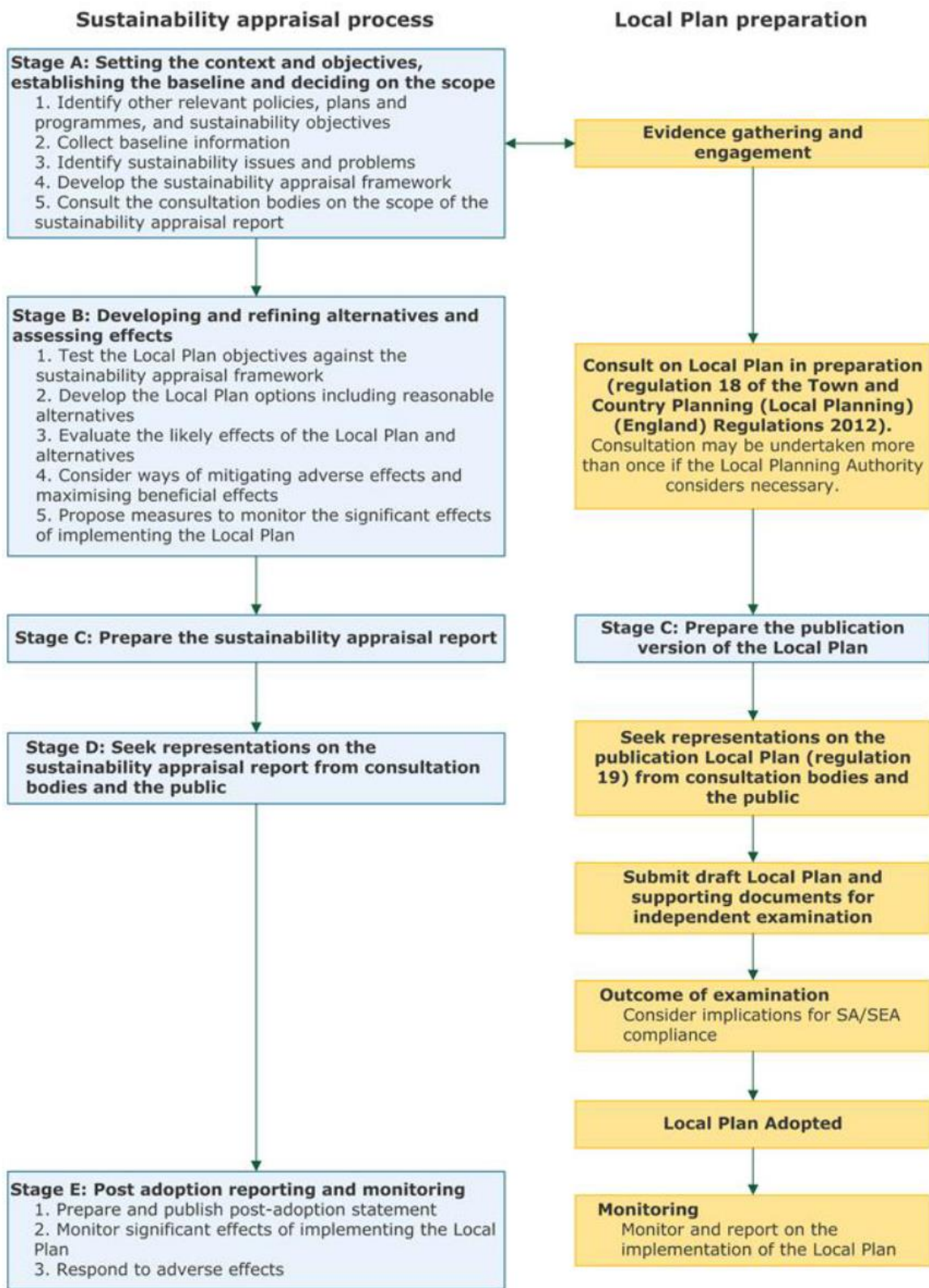
## 1.3 The Sustainability Appraisal

- 1.3.1 European Directive 2001/42/EC requires that a 'Strategic Environmental Assessment' (SEA) is carried out on plans and programmes which are likely to have significant effects on the environment. Therefore, a SEA is required on the Local Plan. The purpose is to consider environmental effects and look at how to mitigate adverse impacts.
- 1.3.2 A 'Sustainability Appraisal' (SA) is also required by the Planning Act 2004. The purpose of Sustainability appraisal is to promote sustainable development through the plan-making process. It involves appraising the social, environmental and economic effects of plans, strategies and policies. It is therefore wider than the SEA process, as it looks at social and economic impacts too. Provided it is carried out in accordance with Government guidance, the Sustainability Appraisal process fully incorporates the requirements of the SEA Directive.

### Sustainability Appraisal Stages

- 1.3.3 The SA process is broken down into 5 stages which occur in parallel with the production of a Local Plan document – this integration is fundamental to sound plan-making. These stages are summarised in the table below.

**Table 1: The Sustainability Appraisal Process in Local Plan Preparation from National Planning Practice Guidance (March 2014)<sup>1</sup>. This Document is the final output for Stage A**



<sup>1</sup> Source: <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

- 1.3.4 **Stage A** involves establishing the framework for undertaking a Sustainability Appraisal. It involves producing a set of objectives against which the document can be assessed – together with the evidence base for the appraisal. The framework and evidence base for the Local Plan were set out in a ‘Scoping Report’ which was published for consultation in 2020. A ‘Final Scoping Report’, incorporating changes, was published in December 2020. The full version of the Scoping Report can be viewed on the District Council’s website at <http://www.eastcambs.gov.uk/local-development-framework/local-plan-review>
- 1.3.5 **Stage B** focuses on the appraisal of the options (or alternatives). This is the current stage in the process. Sustainability considerations have been, and will continue to be, considered throughout the preparation of the Local Plan. Sustainability issues specific to East Cambridgeshire have been identified and consulted on at the SA Scoping Report stage and the alternative policy options have been assessed and will be consulted on through this SA report (December 2021 to February 2022).
- 1.3.6 **Stage C** involves preparing an updated version of the SA report. All policies and any reasonable alternatives (including site allocations if any sites are selected) will be appraised against the SA framework. The likely significant effects in terms of environment, economy and society will be identified and where appropriate any measures to prevent or reduce any significant adverse effects will be identified. This stage will be consulted upon in draft, in late 2022.
- 1.3.7 **Stage D** is the stage where we consult on the Local Plan (final version as far as the Council is concerned) and the final version of the SA report. This is likely to take place in late 2022.
- 1.3.8 The final stage of the process (**Stage E**) involves publishing the final SA and monitoring the significant effects of the Plan. This takes place via the Authorities Monitoring Report, which sets out indicators and targets for monitoring the progress of the Local Plan. The final version of the SA report will include the indicators to monitor the Local Plan.

## 1.4 Habitat Regulation Assessment

- 1.4.1 European Directive 92/43/EEC also requires that a ‘Habitats Regulations Assessment’ (HRA) is carried out to look at the effects of plans on sites of European importance for nature conservation. In East Cambridgeshire there are several such sites, including the Ouse Washes, Wicken Fen and Devils Dyke Special Areas of Conservation (SACs).
- 1.4.2 The first stage of the HRA involves screening, to identify any ‘likely significant effects’ on a European designated site. If such effects are anticipated, a full assessment (termed an ‘appropriate assessment’) needs to be carried out to look at the impact, and identify whether any alternative measures can be adopted to avoid adverse effects.
- 1.4.3 The council will undertake a screening assessment on the SIR after this next round of early consultation. However, as it stands, the SIR is not allocating any new land for development, nor promoting any additional growth than already has consent. It therefore seems extremely unlikely that the SIR, as it progresses, will need to undertake a full HRA. The expectation is that the HRA will ‘screen out’ the need for the SIR to undertake a full HRA.

## 3 The scoping stages

### 3.1 Background

- 3.1.1 This chapter summarises the content of the SA Scoping Report to the Local Plan. The full Scoping Report can be viewed on the Council's website at <http://www.eastcambs.gov.uk/local-development-framework/local-plan-review>. The role of the Scoping Report is to set a framework for carrying out the Sustainability Appraisal process.
- 3.1.2 Consultation with key environmental bodies was carried out on a draft of the SA Scoping Report in 2020. A number of comments were received and relevant changes were made. The final Scoping Report was approved by the Council in December 2020.

### 3.2 Review of relevant plans and programmes

- 3.2.1 The first part of the Scoping process involves reviewing plans, policies, programmes and strategies that are relevant to the Local Plan. This allows identification of key sustainability issues, and potential objectives which should be reflected in the SA.
- 3.2.2 A policy, plan or programme (PPP) may be influenced in various ways by other policies, plans or programmes, or by external sustainability objectives such as those laid down in policies or legislation. Identifying and reviewing these PPPs is an important element of the SA process, helping to shape the objectives against which emerging policies should be appraised, as well as indicating particular issues and problems that need to be addressed. Full details of the assessment of plans and programmes is set out in Appendix A of the Scoping Report itself.

### 3.3 Baseline information

- 3.3.1 'Baseline information' is information on the current state of the environment and current issues. It helps to identify sustainability problems and potential responses/solutions. It also provides the basis for predicting and monitoring the effects of the Local Plan.
- 3.3.2 Comprehensive baseline information is contained in Appendix B of the Scoping Report. It looks at the key issues and potential responses, and also includes baseline data with indicators and regional/national comparators.

### 3.4 Key sustainability issues

- 3.4.1 The review of plans and programmes, and baseline information (as detailed in sections 3.2 and 3.3 above) has led to the identification of a number of key sustainability issues. These are identified in full in the Scoping Report, and are summarised in the table below.

**Table 2: A review of the key issues arising from the baseline data and implications for the review**

Summary of Objectives and Sustainability Requirements	Implications for the Local Plan
<b>Land and Water Resources</b>	
<p><i>Land Resources:</i> UK government objectives include the use of previously developed land where possible.</p> <p><i>Water Resources:</i> National water policies are primarily driven by the aims of the EC Water Framework Directive. Key objectives include improving the quality of rivers and waterbodies to 'good ecological status' by 2015; considering flood risk at all stages of the planning process in order to reduce future damage to property and loss of life; and incorporating water efficiency measures into new developments. At a local level, a Strategic Flood Risk Assessment and Water Cycle Strategy have been carried out.</p>	<p>If, as anticipated, the review only focusses on updating the housing requirement figure of Policy GROWTH 1, with no new allocations, there will be no likely implications arising, but this will be closely monitored during plan preparation.</p>
<b>Biodiversity</b>	
<p>At EU level, in recognition that wild birds, many of which are migratory, are a shared heritage of the Member States and that their effective conservation required international co-operation</p> <p>The objectives of policies and plans at all levels focus on the conservation of biological diversity, including a reduction in the current rate of biodiversity loss and the protection and monitoring of endangered and vulnerable species and habitats. Emphasis is also placed on the ecological importance of brownfield sites, and geodiversity. The integration of biodiversity considerations into all environmental and socio-economic planning is strongly advocated.</p>	<p>If, as anticipated, the review only focusses on updating the housing requirement figure of Policy GROWTH 1, with no new allocations, there will be no likely implications arising, but this will be closely monitored during plan preparation.</p>
<b>Landscape, Townscape and Archaeology</b>	
<p>At the EU level, emphasis is placed on the protection of landscape as an essential component of people's surroundings.</p> <p>Cultural heritage priorities from international to local level include protecting designated and non-designated heritage assets and their settings; establishing mechanisms for their protection against inappropriate development; recognising the potential value of unknown and undesignated resources; and preserving sites and landscapes of archaeological and historic interest so that they may be enjoyed by future generations. Areas where there is likely to be further significant loss or erosion of landscape//townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it. Traffic congestion, air quality, noise pollution and other problems affecting the historic environment.</p>	<p>If, as anticipated, the review only focusses on updating the housing requirement figure of Policy GROWTH 1, with no new allocations, there will be no likely implications arising, but this will be closely monitored during plan preparation.</p>
<b>Environment and Pollution</b>	
<p><i>Climate Change:</i> PPPs focus on mitigating the causes of climate change and adapting to its effects. Commitments to reducing greenhouse gas emissions range from the international level to the regional level. PPPs combine both demand management (reduced energy consumption and increased efficiency of use) and supply side measures (low carbon options and renewables). Adaptation measures proposed include a presumption against development in high flood risk areas, appropriate design of new development and promotion of new infrastructure such as SUDs.</p> <p><i>Air Quality:</i> Poor air quality can have negative impacts on health and the environment, as well as having economic implications.</p> <p><i>Waste:</i> Reduce the volumes of waste generated and the quantities going to disposal, and give preference to waste recovery and recycling. Related objectives include the protection of health and the environment against harmful effects caused by dumping of waste. Need for reduction in landfill waste and priority is given to recycling waste as much as possible. Reduce, reuse and recycle is the main objectives for waste.</p>	<p>If, as anticipated, the review only focusses on updating the housing requirement figure of Policy GROWTH 1, with no new allocations, there will be no likely implications arising, but this will be closely monitored during plan preparation.</p>



Summary of Objectives and Sustainability Requirements	Implications for the Local Plan
<b>Healthy Communities</b>	
<p>National and regional health-related PPPs focus on improving rates of infant mortality and life expectancy; reducing work-related illness and accidents; increasing participation in sport and physical activity; supporting the public to make healthier and more informed choices; improving accessibility to healthcare facilities; and reducing health inequalities.</p> <p><i>Open space:</i> National, regional and local level policies advocate the provision of open space and green networks as opportunities for sport and recreation, creating healthier communities, reducing the impact of noise and air pollution and limiting the risk of flooding.</p>	<p>If, as anticipated, the review only focusses on updating the housing requirement figure of Policy GROWTH 1, with no new allocations, there will be no likely implications arising, but this will be closely monitored during plan preparation.</p>
<b>Inclusive Communities</b>	
<p>A wide range of objectives exists from a European to a local level with regards to the creation of inclusive communities. In particular these focus on improving social inclusion; reducing poverty; improving housing quality and affordability; preventing crime and anti-social behaviour; improving skill levels and employability and regenerating communities.</p> <p><i>Housing:</i> Government objectives include improvements in housing affordability; high quality housing; a more stable housing market; improved choice; location of housing supply which supports accessibility and economic development; an adequate supply of publicly-funded housing for those who need it.</p>	<p>If, as anticipated, the review only focusses on updating the housing requirement figure of Policy GROWTH 1, with no new allocations, there will be no likely implications arising, but this will be closely monitored during plan preparation.</p>
<b>Economic Activity</b>	
<p>The improvement and maintenance of high and stable levels of economic growth and employment are key aims of the strategies at UK and European levels. At a regional and local level, emphasis is placed on attracting the research and technology sectors; addressing training and skills issues; supporting appropriate farm diversification; investing in infrastructure; promoting sustainable tourism and supporting Cambridge as a sub-regional centre.</p>	<p>If, as anticipated, the review only focusses on updating the housing requirement figure of Policy GROWTH 1, with no new allocations, there will be no likely implications arising, but this will be closely monitored during plan preparation.</p>

### 3.5 Sustainability Appraisal Framework

- 3.5.1 The SA framework provides the means by which the sustainability effects of the Local Plan can be measured, compared and analysed. The SA framework in Table 3 below is taken from the Scoping Report 2020. It sets out 22 SA objectives, along with sub-objectives/decision-making criteria. The same objectives are selected for the emerging Local Plan Review.
- 3.5.2 Undertaking the sustainability appraisal involves appraising the options and policies against the SA framework, using a scoring system. This scoring system is detailed in Table 4 below. The scoring system defines the impact on each objective, ranging from a 'strong and significant beneficial impact', to 'strong and significant adverse impact.' The assessment also allows for situations where there is insufficient information to make an assessment or where the impact is uncertain to predict at that stage.

**Table 3: Sustainability Appraisal Objectives and Key Questions**

<b>SA topic</b>	<b>SA Objective</b>	<b>Key Questions</b>
1 Land and water resources	<b>1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings</b>	<ul style="list-style-type: none"> <li>• Will it optimise the use of previously developed land, buildings and existing infrastructure?</li> <li>• Will it use land efficiently?</li> <li>• Will it protect and enhance the best and most versatile agricultural land?</li> </ul>
	<b>1.2 Reduce the use of non-renewable resources including energy sources and increase the use of renewable energy</b>	<ul style="list-style-type: none"> <li>• Will it reduce energy consumption?</li> <li>• Will it increase the proportion of energy needs being met from renewable sources?</li> </ul>
	<b>1.3 Limit water consumption to levels supportable by natural processes and storage systems</b>	<ul style="list-style-type: none"> <li>• Will it reduce water consumption?</li> <li>• Will it conserve ground water resources?</li> </ul>
2 Biodiversity	<b>2.1 Avoid damage to designated statutory and non-statutory sites and protected species</b>	<ul style="list-style-type: none"> <li>• Will it protect sites designated for nature conservation interest?</li> <li>• Will it mitigate against any harm caused by proposed development?</li> </ul>
	<b>2.2 Maintain and enhance the range and viability of characteristic habitats and species</b>	<ul style="list-style-type: none"> <li>• Will it conserve species, reverse declines, and help to enhance diversity?</li> <li>• Will it reduce habitat fragmentation?</li> <li>• Will it help achieve Biodiversity Action Plan targets?</li> </ul>
	<b>2.3 Improve opportunities for people to access and appreciate wildlife and wild places</b>	<ul style="list-style-type: none"> <li>• Will it improve access to wildlife, and wild places?</li> <li>• Will it maintain or increase the area of high-quality green space?</li> <li>• Will it promote understanding and appreciation of wildlife?</li> </ul>
3 Landscape, townscape and archaeology	<b>3.1 Conserve, sustain and enhance the historic environment including the significance of designated and non-designated heritage assets (and any contribution made to that significance by setting)</b>	<ul style="list-style-type: none"> <li>• Will it protect or enhance sites, features or areas of historical, archaeological, or cultural interest and their settings?</li> <li>• Will it foster heritage-led sustainable tourism?</li> </ul>
	<b>3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character</b>	<ul style="list-style-type: none"> <li>• Will it maintain and enhance the diversity and distinctiveness of landscape and townscape character?</li> <li>• Will it protect and enhance open spaces of amenity and recreational value?</li> <li>• Will it maintain and enhance the character of settlements?</li> </ul>
	<b>3.3 Create places, spaces and buildings that work well, wear well and look good</b>	<ul style="list-style-type: none"> <li>• Will it improve the satisfaction of people with their neighbourhoods as places to live?</li> <li>• Will it lead to developments built to a high standard of design?</li> </ul>
4 Environment and pollution	<b>4.1 Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light)</b>	<ul style="list-style-type: none"> <li>• Will it reduce emissions of greenhouse gases?</li> <li>• Will it improve air quality?</li> <li>• Will it reduce traffic volumes?</li> <li>• Will it support travel by means other than the car?</li> <li>• Will it reduce levels of noise?</li> <li>• Will it reduce or minimise light pollution?</li> <li>• Will it reduce water pollution?</li> </ul>

SA topic	SA Objective	Key Questions
	<b>4.2 Minimise waste production and support the recycling of waste products</b>	<ul style="list-style-type: none"> <li>• Will it reduce household waste?</li> <li>• Will it increase waste reuse and recycling?</li> <li>• Will it reduce waste from other sources?</li> </ul>
	<b>4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)</b>	<ul style="list-style-type: none"> <li>• Will it minimise risk to people and property from flooding, storm events or subsidence?</li> <li>• Will it improve the adaptability of buildings to changing temperatures?</li> <li>• Will it reduce waste from other sources?</li> <li>• Will it reduce carbon footprint?</li> </ul>
	<b>4.4 Environment</b>	<ul style="list-style-type: none"> <li>• Will it protect, enhance and manage the character and appearance of landscape/townscape, maintaining and strengthening local distinctiveness and sense of place?</li> <li>• Will it protect, manage and improve local environmental quality and help towards 'doubling nature' in Cambridgeshire?</li> <li>• Will it achieve high quality sustainable design for buildings, spaces and the public realm?</li> </ul>
5 Healthy communities	<b>5.1 Maintain and enhance human health</b>	<ul style="list-style-type: none"> <li>• Will it reduce death rates?</li> <li>• Will it encourage healthy lifestyles?</li> </ul>
	<b>5.2 Reduce and prevent crime, and reduce the fear of crime</b>	<ul style="list-style-type: none"> <li>• Will it reduce actual levels of crime?</li> <li>• Will it reduce fear of crime?</li> </ul>
	<b>5.3 Improve the quantity and quality of publicly accessible open space</b>	<ul style="list-style-type: none"> <li>• Will it increase the quantity and quality of publicly accessible open space?</li> </ul>
6 Inclusive communities	<b>6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)</b>	<ul style="list-style-type: none"> <li>• Will it improve accessibility to key local services and facilities?</li> <li>• Will it improve accessibility by means other than the car?</li> <li>• Will it support and improve community and public transport?</li> <li>• Will it improve and broaden access to the local historic environment?</li> </ul>
	<b>6.2 Redress inequalities related to age, gender, disability, race, faith, location and income</b>	<ul style="list-style-type: none"> <li>• Will it improve relations between people from different backgrounds or social groups?</li> <li>• Will it reduce poverty and social exclusion in those areas most affected?</li> <li>• Will it promote accessibility for all members of society?</li> </ul>
	<b>6.3 Ensure all groups have access to decent, appropriate and affordable housing</b>	<ul style="list-style-type: none"> <li>• Will it support the provision of a range of housing types and sizes to meet the identified needs of all sectors of the community?</li> <li>• Will it reduce the number of unfit homes?</li> <li>• Will it meet the needs of the travelling community?</li> </ul>
	<b>6.4 Encourage and enable the active involvement of local people in community activities</b>	<ul style="list-style-type: none"> <li>• Will it increase the ability of people to influence decisions?</li> <li>• Will it provide better opportunities for people to understand local heritage, buildings and to participate in cultural and leisure activities?</li> </ul>
7 Economic activity	<b>7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence</b>	<ul style="list-style-type: none"> <li>• Will it encourage business development?</li> <li>• Will it improve the range of employment opportunities?</li> <li>• Will it improve access to employment / access to employment by means other than the car?</li> <li>• Will it encourage the rural economy and diversification?</li> </ul>

SA topic	SA Objective	Key Questions
	<b>7.2 Support appropriate investment in people, places, communications and other infrastructure</b>	<ul style="list-style-type: none"> <li>• Will it improve the level of investment in key community services and infrastructure?</li> <li>• Will it support provision of key infrastructure?</li> <li>• Will it improve access to education and training, and support provision of skilled employees?</li> <li>• Will it foster heritage-led regeneration and address heritage at risk?</li> </ul>
	<b>7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy</b>	<ul style="list-style-type: none"> <li>• Will it improve business development and enhance competitiveness?</li> <li>• Will it support Cambridgeshire's lead role in research and technology-based industries, higher education and research?</li> <li>• Will it support sustainable tourism?</li> <li>• Will it protect the shopping hierarchy, supporting vitality and viability?</li> <li>• Will it support the sustainable use of historic farmsteads?</li> </ul>

**Table 4 – Key to appraisal symbols**

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

## Single Issue Review (SIR) of the 2015 Local Plan

- 4.1 The Council's Local Plan remains its 2015 version.
- 4.2 The adopted Local Plan being greater than five years old it is necessary (by law) to regularly review its content to determine how 'up to date' it is. The Council undertook, and published, its last formal Review in April 2020. That Review, in summary, concluded that the:

*"...Local Plan 2015 does require to be revised, but only partially and only in respect of its strategic housing policies. Of those policies, Policy GROWTH1 needs to be revised, because it has an out of date housing requirement. Other strategic housing policies may also be updated during the course of updating GROWTH1, should that be necessary.*

*The rest of the Local Plan is considered to not, at the present time, be in need of updating, therefore a full update of the Local Plan is not considered necessary.*

*However, whilst only one policy has been identified in need of updating, this does not prevent the council from commencing preparation of a new Local Plan, in whole or part, on matters as it sees fit."*

- 4.3 The Council agreed in October 2020 to commence preparation of a limited update of the Local Plan, focussing on the matters identified in the Review, namely GROWTH1 and its *housing requirement*, and possibly, consequentially, other policies if strictly necessary. The options to 'do nothing' or undertake a more comprehensive Local Plan update (including new allocations) were rejected by the Council.
- 4.4 The update of Policy Growth 1 and the *housing requirement* figure it contains is somewhat a factual update. This is because national policy stipulates the rules in terms of what the starting point should be for *housing need* for a local area (known as the 'local housing need' (LHN) for an area) and the method for working it out (the national 'standard method'). The variables and data used in the standard method are all based on nationally published formula and statistics, so there is no scope to arrive at any nationally derived local *housing need* figure other than one derived by the standard formula using government published data. Theoretically, a local area could set its *housing requirement* figure (i.e. the target number of homes it actually is to be tested against) as being different from the nationally derived local *housing need* figure, but in reality, the vast majority of councils simply use the nationally derived local *housing need* figure as their *housing requirement* figure.
- 4.5 The district benefits from an attractive rural environment, and has a good level of overall prosperity. However, a number of specific issues need to be addressed. These are mainly related to the challenges of managing high levels of growth and the effects of population increase.
- 4.6 A first round (of three) consultation took place in March-May 2021, and generated a relatively small number of responses. A summary of these responses, and the officer recommended position, is available on Council's website (<https://www.eastcamb.gov.uk/local-development-framework/local-plan-review>). Unsurprisingly, considering the very limited and technical update of the Local Plan, the responses were primarily from the development industry.
- 4.7 Whilst the responses have been carefully considered, it was proposed SIR not to be fundamentally amended in approach than that set out in the first round consultation document. For example, it was considered there was no reason to meet some representor requests to: extend the plan period; undertake wider policy update; or include new site allocations in the updated Plan. These are all matters which can await a full review of the Local Plan.

## 5 Sustainability Appraisal of the Local Plan

5.1 The purpose of this stage of the SA is to test reasonable alternative options for the Local Plan, and identify and evaluate their sustainability effects. This chapter sets out how the options/alternatives were selected; and the results of the sustainability appraisal assessment. This is in line with the SEA Directive which requires that the SA report identifies:

- The reasons for selecting the alternatives tested in light of the others available; and
- The likely significant effects on the environment of the reasonable alternatives

### 5.2 Testing the Local Plan objectives

5.2.1 The objectives of the Local Plan set out what the District Council is trying to achieve in spatial planning terms, and sets the context for the options and preferred options. It is therefore important to ensure that the objectives are in accordance with the principles of sustainability. As the spatial objectives are the same as the sustainability appraisal objectives there is, therefore, no need to appraise these.

### 5.3 Developing the Local Plan options

5.3.1 By testing each emerging policy in the Local Plan against the sustainability objectives, (using the defined decision making criteria in section 3), this ensures that all policies are compatible with the SA objectives and by extension meet the sustainability principles identified in the Local Plan. .

5.3.2 The SA process requires assessment of all 'reasonable alternatives.' For some policy areas there are limited or no alternative options. For example, many of the environmental policies such as protection of nature conservation sites, and historical assets – where strategy is dictated by national planning policy. The number of options has been kept manageable and has focused on those aspects where real choices have to be made.

### 5.4 Evaluate the likely effects of the Local Plan and alternatives

5.4.1 The significant effects of each of the options have been considered in full (see Appendix B) against each of the sustainability criteria and scored using the scoring system described in section 3 in particular tables 3 and 4. The SA guidance requires policy options to be compared with the likely growth of East Cambridgeshire without the Local Plan. The SA Scoping Report assesses the likely effect of not producing a new Plan. Most of the policy options tested also fulfil this requirement as they either carry over the existing policy or test the scenario of not having a policy and relying on national policy in the form of NPPF.

5.4.2 The effects considered have included secondary, cumulative, synergistic, short, medium, long-term, permanent, temporary, positive and negative effects. Any judgements made through the assessment of policy options have been explained including any assumptions, in order to make the SA process as transparent as possible (see Appendices A and B).

### 5.5 Consider ways of mitigating adverse effects and maximising potential effects

5.5.1 Deductions on the sustainability strengths and weaknesses of each option have been recorded in this SA Report (Appendix A), together with any recommendations for improving the positive effects and reducing (mitigating) potential negative effects. Reasons for eliminating other options have also been recorded. In many instances however it is likely that it will not be possible to quantify the effects of the Plan, especially given that the Local Plan will be only one influence on what actually happens on the ground. It is intended that sufficient flexibility is built into the Plan in order to respond to changing circumstances (such as economic upturns/downturns).

### 5.6 Propose measures to monitor the significant effects of implementing the Local Plan

5.6.1 The SA report lists a series of indicators (see Appendix C) which will help to develop a monitoring framework with which to monitor the effects of the adopted Plan. Most if not all of the anticipated effects are currently monitored through some existing mechanism, however through consultation on the SA and the emerging Local Plan policies it may become apparent that some additional monitoring mechanisms may be required. The implementation and monitoring framework will be set out in the final version of the SA report. The effects for all policies will be monitored through the council's AMR.

## **5.7 Stage C: Preparing the Sustainability Appraisal Report (see Table 1)**

5.7.1 This SA report shows in detail the SA process which has been undertaken, along with the results of the appraisal of the policy options of the Local Plan (Appendix B). It includes an overall assessment of the sustainability effects of the Local Plan policies on each of the SA/Plan objectives. The SA report will be consulted on and amended accordingly at each stage of the Local Plan preparation process. The final report structure is subject to change following consultation on the SA and the emerging Local Plan.

## **5.8 Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public**

5.8.1 The final SA Report for the Local Plan will be consulted on for a statutory minimum six-week period alongside the Local Plan as part of the proposed submission public consultation stage (expected late 2022). Consultation will need to comply with the Statement of Community Involvement and the requirements of the SEA Directive. Should any significant changes be made to the Local Plan as a result of public consultation, additional appraisal work may need to be carried out and the SA may need to be amended to reflect the results.

## **5.9 Stage E: Post adoption reporting and monitoring**

5.9.1 This stage will come into effect upon adoption of the new Local Plan. The SEA Directive and the SA Guidance require Sustainability Appraisal Reports to include details of the Local Plan monitoring framework, showing for each policy, which indicators will be used to measure it, what the targets are and who will be responsible for recording the information. The outcomes of this monitoring will be reported annually in the council's AMR.

# **6 Sustainability Appraisal Framework**

6.1 The SA Framework (as established through the SA Scoping Report) provides a simple and recognised way in which the anticipated social, environmental and economic effects of a plan can be examined and the alternative options can be compared.

6.2 The anticipated effect of each policy has been assessed in relation to the SA objective, using a standard SA scoring system as set out below. The scoring ranges from strong significant beneficial impact to strong significant adverse impact (see table 4).

6.3 The aim of the SA scoring system is to provide transparency in the appraisal process, enabling a clear and consistent approach to the appraisal. It is important to note that the SA process is only an assessment tool. It does not make any decisions, but is intended to ensure that the full sustainability issues are considered with all options and choices made, so that ultimately the final decision about what policies to include in the document can take these into account.

6.4 The policies of the Local Plan and all reasonable alternatives have been fully appraised using the above scoring system (see Appendix B). Table 3 explains the criteria used to assess if a policy scores a significant positive or significant negative effect.

## 7 Sustainability Appraisal of the Single Issue Review (SIR) of the 2015 Local Plan

- 7.1 As explained in paragraph 5.2.1, normally the first stage in the Sustainability Appraisal of the Local Plan is the assessment of the objectives of the Plan against the objectives of the SA Framework; this is to test the compatibility of the objectives and to identify any potential conflicts. However, as the SA objectives and Local Plan objectives have been designed to match, there is no need to compare the objectives. Appraisal of reasonable alternatives considered at this Consultation Stage.
- 7.2.1 For clarity, the review is not seeking views on any other aspect of the 2015 Local Plan, and not seeking any suggested new allocation sites. Any suggested sites for allocation in the Local Plan will not be considered, as they are unnecessary. If at any stage, either for this SIR or a future Local Plan, new allocations become necessary, it will be essential to undertake a specific ‘call for sites’ process to do so. No such call for sites process is presently forecast.
- 7.2.2 In line with April 2020 formal review of the Local Plan, the changes arising from the SIR to section 3.2 (Level of Growth) and 3.5 (Delivery of Growth) of the 2015 Local Plan, and specifically:
- Paragraphs 3.2.3 – 3.2.5, under the sub-heading ‘Level of housing growth’;
  - Policy Growth 1, but limited to the first bullet point of Growth 1 only (which relates to the housing requirement for the district); and
  - Paragraphs 3.5.5 – 3.5.7, under the sub-heading ‘Housing delivery’, this being necessary as a consequence of updating the above.
- 7.2.3 The following boxes identify the precise changes being proposed to the Local Plan, using a series of crossed out text and bold italics new text.

Proposed Change ref:	Local Plan Text (as proposed to be amended)
1	<p>Front Cover amended by addition of the following under “April 2015”:</p> <p><i>(as amended [add date of adoption])</i></p>
2	<p>Text Box at top of Page 1 amended as follows:</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>This East Cambridgeshire Local Plan Development Plan Document was adopted at a full meeting of East Cambridgeshire District Council on 21 April 2015, <b><i>with the exception of Policy GROWTH 1 and its supporting text, which has been updated and adopted at a full meeting of the Council on xx xxxx 20xx.</i></b></p> </div>
	<p>Add new text after para 1.2.7 as follows:</p> <p><b><i>1.2.8 Following consultation and independent examination over the period 2021-2023, a very limited updating of the Local Plan took place, which had the primary effect of updating the housing requirement figure in Policy GROWTH 1.</i></b></p> <p><b><i>1.2.9 Those limited updates were formally adopted by the Council on [add date of adoption], and incorporated into the Local Plan accordingly. For the avoidance of doubt, other than Policy GROWTH 1, no other Policy was updated and no new site allocations made.</i></b></p>



Amend the supporting text 3.2.3-3.2.5 as follows:

### **Level of housing growth**

3.2.3 Following the abolition of Regional Spatial Strategies, the District Council is **was** responsible for identifying a housing 'target' in the **2015** Local Plan. The right level of housing can help to support economic growth, meet local housing needs, and facilitate the delivery of infrastructure. Having a housing target also allows a local authority to work with service providers and other organisations to ensure suitable infrastructure is provided to meet the needs of new development.

3.2.4 The housing requirement for East Cambridgeshire **for the 2015 Local Plan needed needs to** be justified and based on an objective assessment of need (paragraph 47 in **2012** National Planning Policy Framework). ~~This involves looking at housing needs and demands (including demographic evidence, affordability levels, jobs growth) – but also taking account of supply, delivery and strategic matters which may have an impact (including land availability, infrastructure capacity and market deliverability). It also involves co-ordination with the strategy of neighbouring authorities, and working together to ensure the needs of the housing market area are met.~~ The District's Council's housing requirement has been informed by the following key evidence documents:

- ~~'Technical Report on Population, Housing and Employment' (May 2013) – commissioned jointly by Cambridgeshire authorities and Peterborough and undertaken by Cambridgeshire County Council.~~
- A new 'All Homes' chapter in the Strategic Housing Market Assessment (SHMA) (May 2013) – looking at objectively assessed need across the Cambridge Housing Market Area. The work was jointly commissioned by the Housing Board and the Strategic Planning Unit for Cambridgeshire and Peterborough.

3.2.5 The SHMA identifies a need for 13,000 dwellings in East Cambridgeshire between 2011 and 2031. However, under the 'duty to cooperate' the District Council has reached agreement with other Cambridgeshire authorities and Peterborough Council to deliver a total of 11,500 dwellings between 2011 and 2031. This agreement, involving a redistribution of housing between some of the authorities, is set out in the 'Memorandum of Cooperation between Cambridgeshire and Peterborough authorities' (May 2013). The Memorandum concludes that the target for East Cambridgeshire should be lower than 13,000 dwellings as the Council has 'made considerable progress to date with [its] local plan reviews, and therefore have established a good understanding of their areas' development opportunities and constraints. They have also taken account of the July 2012 joint statement by Peterborough and Cambridgeshire authorities which confirmed that the strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough, and to other main centres of employment, whilst avoiding dispersed development.' The agreed target of 11,500 dwellings for East Cambridgeshire represents an annual rate of 575 dwellings per year. This rate is more than the previous Regional Strategy target for the district (430 per year) and is suitably challenging given the recent economic downturn and altered market conditions. Details regarding delivery are set out in Policy GROWTH 4 below. In summary, the evidence indicates that this level of housing growth:

- ~~Will be sufficient to meet East Cambridgeshire's own housing needs, and is a coherent strategy in the context of neighbouring local authorities emerging Plans.~~
- ~~Is a sustainable level of housing which should help to support the Council's strategic aim to provide a better balance between housing and employment and reduce levels of out-~~

	<p>commuting.</p> <ul style="list-style-type: none"> <li>● <del>Will support the predicted growth in the local economy up to 2031.</del></li> <li>● <del>Can be accommodated on sufficient, suitable available sites within the district.</del></li> <li>● <del>Is deliverable, in terms of market supply and capacity. Will help to deliver the Council's strategic aims of regenerating and expanding the district's market towns, and supporting the maintenance and sustainability of villages (in the context of a declining and ageing population).</del></li> <li>● <del>Is consistent with the strategy for the Cambridge Sub-region (as set out in the Joint Planning Statement).</del></li> <li>● <del>Will be supported by appropriate levels of new infrastructure and services; and,</del></li> <li>● Will help to facilitate the delivery of appropriate levels of affordable housing to meet local needs over the Plan period.</li> </ul> <p><b>3.2.5 However, through periodic updates of the NPPF (latest version at time of writing is July 2021), Government has removed the requirement for a local planning authority to establish an 'objectively assessed need' for housing, and instead put in place a national standard method to determine a 'local housing need'. Applying that standard method for East Cambridgeshire, for the period 2021-2031, it is determined that the local housing need for East Cambridgeshire is 6,157 dwellings. Following consultation and testing of this figure, it has been determined that 6,157 also becomes the housing requirement for East Cambridgeshire, for the period 2021-31 (i.e. no adjustment was necessary in translating the identified housing need into the housing requirement figure). In order to complete the housing requirement for the full plan period 2011-2031, the housing requirement for 2011-2021 is, in accordance with national guidance, determined as being the housing delivered in that period. 3,018 (net) homes were delivered in East Cambridgeshire between 2011-21, therefore that becomes the housing requirement for that same period. Overall, therefore, the total housing requirement for the plan period, as updated by the single issue review of the Local Plan which concluded in [2022 or 2023 – TBC], is 9,175 new dwellings for the plan period 2011-31.</b></p>
	<p>Amend Policy GROWTH 1 as follows:</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p><u>Policy GROWTH 1: Levels of housing, employment and retail growth</u></p> <p>In the period 2011 to 2031, the District Council will:</p> <ul style="list-style-type: none"> <li>● Make provision for the delivery of <del>11,500</del> <b>9,175</b> dwellings in East Cambridgeshire, <b>comprised of a dwelling requirement of:</b> <ul style="list-style-type: none"> <li>- <b>3,018 dwellings, for the ten year period 2011-2021</b></li> <li>- <b>6,157 dwellings for the ten year period 2021-2031</b></li> </ul> </li> <li>● Maximise opportunities for jobs growth in the district, with the aim of achieving a minimum of 9,200 additional jobs in East Cambridgeshire. Part of this strategy will involve making provision for a deliverable supply of at least 179 ha of employment land for B1/B2/B8 uses, and providing for home working.</li> </ul> <p>In the period 2012 to 2031, the District Council will:</p> <ul style="list-style-type: none"> <li>● Make provision for at least an additional 3,000m<sup>2</sup> (net) of convenience and 10,000m<sup>2</sup> (net) of comparison retail floorspace in the district.</li> </ul> </div>

Para 3.5.6 will be consequentially updated as follows:

3.5.6 Table 3.2 summarises how and where housing is likely to be delivered in East Cambridgeshire over the Plan period. It identifies there will be sufficient overall supply of land to meet the district’s housing requirement of ~~11,500~~ **9,175** dwellings, as set out in Policy GROWTH 1. The latest projections (as at ~~October 2021~~ **September 2014**) indicate that ~~an estimated 12,000~~ **over 11,000** additional dwellings could come forward between 2011 and 2031, **with a further identifiable supply of over 2,000 dwellings beyond the plan period**. ~~It is estimated that approximately 6,500 of these dwellings will be on new allocations, mainly on the edge of existing towns and villages. The table also includes~~ **excludes** reference to **(or any assumed supply from)** ‘broad locations’, which are identified in the key diagrams below. The diagrams are indicative only and identify broad areas on the edge of Soham and Littleport which were identified as ‘phase 2’ sites in the Soham and Littleport Masterplans, and could be developed in the future. The supply from this source is not anticipated to be required in strategic terms until the later part of the Plan period, **if at all**. Therefore the locations are broadly identified at this stage – and it is intended that the specific site boundaries will be identified through the next Local Plan review. ~~There is sufficient identified capacity on the edge of Soham and Littleport to enable this source of supply to be realised. The table also shows that the distribution of development accords with the locational strategy in Policy GROWTH 2, with significant new land allocations proposed on the edge of Ely, Soham and Littleport, and smaller amounts on the edge of villages where this is supported by the local community. A full list of allocation sites is set out in Policy GROWTH 4 (with site-specific policies contained in Part 2 of this Local Plan).~~

Para 3.5.7, and table 3.2, will be consequentially updated as follows:

3.5.7 Further details of the various sources of housing **delivered, housing** supply, the breakdown by settlement, and predicted levels of supply year on year throughout the Plan period (the ‘housing trajectory’) is set out in the **annual Authorities Annual Monitoring Report and the regularly updated (at least once a year) Five Year Housing Land Supply Report, both of which are available on the Council’s website**. ~~[until the Local Plan is adopted, the latest housing trajectory for the Local Plan will be contained in a separate Background Paper on ‘Housing Supply’—see the Council’s website]. The housing trajectory in the Council’s ‘Housing Supply Paper’ September 2014 demonstrates that a five-year supply of specific deliverable sites incorporating an additional buffer of 5% can be identified in the district as required by Government. Further information on the tenure and type of dwellings is set out in Chapter 4 of this Local Plan.~~

Table 3.2 – Summary of estimated housing supply 2011-31

Location	Completions 2011/12	Outstanding commitments	Large potential	Small windfall	Specific rural	Allocations	TOTAL

	- 2012/13	ments as at 1.4.13	al-sites	sites	sites		
Market towns	458	950	315	241	0	5849	7782
Ely	95	145	56	68	0	3679	4043
Soham	260	256	40	114	0	1620	2290
Littleport	103	549	188	59	0	550	1449
Villages	200	321	276	421	70	659	1947
Rural windfall estimate	-	-	-	471	-	-	471
Broad locations	-	-	-	-	-	-	1,800
TOTAL	658	1271	560	1133	70	6508	12,000

**Table 3.2 – Summary of estimated housing supply 2011-31**

<b>Site Status at 01 April 2021</b>		<b>Total Delivered 2011-2021</b>	<b>Total Supply 2021-2026</b>	<b>Total Supply 2026-2031</b>	<b>Total Supply 2021-31</b>	<b>Total Supply Post 2031</b>
<b>Planning permission</b>		<b>3,018</b>	<b>3,930</b>	<b>1,760</b>	<b>5,690</b>	<b>698</b>
<b>Dwellings allocated in development plan, without consent at April 2021</b>			<b>346</b>	<b>641</b>	<b>987</b>	<b>115</b>
<b>Dwellings on unallocated sites and without consent at April 2021</b>			<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>Other supply</b>	<b>Dwellings with insufficient evidence that they will be delivered within five year period</b>		<b>0</b>	<b>1,004</b>	<b>1,004</b>	<b>1,195</b>

		<b>Windfall allowance</b>		<b>150</b>	<b>250</b>	<b>400</b>	<b>N/A</b>
		<b>Older people's accommodation (C2)</b>		<b>97</b>	<b>0</b>	<b>97</b>	<b>0</b>
		<b>Totals</b>	<b>3,018</b>	<b>4,524</b>	<b>3,655</b>	<b>8,179</b>	<b>2,008</b>
		<b>Grand Totals</b>	<b>11,197</b> <b>(Housing Supply 2011-2031)</b>				<b>2,008</b> <b>(Housing Supply Post 2031)</b>

7.2 A full appraisal of the review policy along with all reasonable alternatives can be found in Appendix B. Table 5 below provides the SA scores for the policy.

**Table 5 – Summary of Preferred Options SA Results**

SA Topic	1 Land and Water Resources			2 Biodiversity			3 Landscape, townscape and archaeology			4 Climate change and pollution			5 Healthy Communities			6 Inclusive communities			7 Economic activity			
	1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings	1.2 Reduce the use of non-renewable resources including energy sources	1.3 Limit water consumption to levels supportable by natural process and storage systems	2.1 Avoid damage to designated statutory and non-statutory sites and protected species	2.2 Maintain and enhance the range and viability of characteristic habitats and species	2.3 Improve opportunities for people to access and appreciate wildlife and wild places	3.1 Conserve, sustain and enhance the historic environment including the significance of designated and non-designated heritage assets (and any	3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape	3.3 Create places, spaces and buildings that work well, wear well and look good	4.1 Reduce emissions of greenhouse gases and other pollutants (including air, water, soil, noise, vibration and light)	4.2 Minimise waste production and support the recycling of waste products	4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)	5.1 Maintain and enhance human health	5.2 Reduce and prevent crime, and reduce the fear of crime	5.3 Improve the quantity and quality of publicly accessible open space	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training and leisure opportunities)	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	6.3 Ensure all groups have access to decent, appropriate and affordable housing	6.4 Encourage and enable the active involvement of local people in community facilities	7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence	7.2 Support appropriate investment in people, places, communications and other infrastructure	7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy
SA Framework																						
Option 1. Housing Requirement derived from Government Standard method. Consequently, no new allocations or additional growth arising.	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~
Option 2. No Policy, rely on national policy	?	?	?	?	?	~	~	~	~	~	~	~	~	~	~	?	?	~	~	~	~	~
Option 3. Provide for a higher level of growth than the Government's standard method, likely meaning new allocations and additional growth arising.	--	-	-	?	?	?	?	?	~	-	~	~	~	~	~	++	++	~	+	++	~	~
Option 4. Provide for a lower growth than the Government's standard method. Consequently, no new allocations or additional growth arising.	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~



## 8. Summary of findings

- 8.1 The findings of the SA for the GROWTH1 policy and alternatives options considered are summarised in Appendix B. It should be noted that this SA report has not been used to select the proposed option, rather, it satisfies the requirements of Government guidance on SA and the SEA Directive to identify the likely significant sustainability effects of implementing the Plan, and has assisted in the selection of the wording for the revised policy.
- 8.2 Table 5 records the SA result of the all options considered. As shown in the table, the preferred approach does not always have the most positive impact than other options considered in particular higher growth (option 3). Higher growth could produce some positive benefit in that it will provide greater choice in housing, investment and create more employment opportunities. But higher growth also has more negative impact on the environmental objectives such as more greenfield sites will have to be used. There are also more uncertainties with higher growth than the preferred option. Overall, it is considered the policy (option1) will have no negative impact, as well as being the most aligned to national policy. Options 2 and 4 are unlikely to pass the test of being in accordance with national policy, and in any effect, do not perform materially better than the preferred option. Many of the effects of the options are unclear at this stage. This is because of the strategic nature of the Local Plan objectives and policies, and therefore there are uncertainties surrounding their implementation and outcomes in practice. Implementation of some of the proposed policy may be reliant on more detail on, for example, decisions made through the Development Management process. For the broader objectives and policies, the appraisal process has had to concentrate on whether, in principle, the proposed policy is compatible with the SA objectives and to avoid trying to consider every eventuality.
- 8.3 Appendix A provides a brief summary of the options considered for the policy and discuss the preferred option and justification for selecting the option when compared with the alternatives.
- 8.4 In summary, the outcomes of the SA show that the preferred policy option contained in this version of the SIR of the Local Plan will have a neutral effect. This is because it will not result in any new growth than committed already, nor will it harm any growth coming forward that is already committed.

### Recommendations

- 8.5 The findings of the SA for the SIR of the Local Plan are summarised in Table 5 above, with the full appraisal of the policy, along with corresponding reasonable alternatives, found at Appendix B, the preferred policy does not result in any negative impacts. It is acknowledged that the Local Plan review is at an early stage and therefore further iterations of this SA will be necessary.



## Appendix A. Preferred Policy and other Options Considered

### Policy GROWTH 1 - Level of Growth

- 1.1 The SIR consultation document describes the rationale for the proposed approach, explaining how it fits with national policy.
- 1.2 The alternative options considered for this policy are:

Options Considered	
1	Growth delivered in accordance with the Government's standard method
2	No Policy, rely on national policy
3	Provide for a higher level of growth than the Government's standard method
4	Provide for a lower growth than the Government's standard method

### Preferred Policy Option

Option 1 brings the policy up to date, but in effect has no impact on the level of growth coming forward or sites being allocated. It therefore has a neutral impact.

### Other Options Considered

Although option 3 scored positively on some aspects compared with option 1, due to providing greater choice in housing for example, this option would generally have negative effects on the environment and resources especially on undeveloped land. It is more difficult to predict the outcome of option 2 as some housing will be provided using national policy, but it may well be speculative and uncontrolled, leading to potential harm. More importantly, it is unlikely to pass wider soundness tests, as Government requires a housing requirement to be stipulated in a Local Plan. Option 4 would be identical to option 1. Whilst the overall housing requirement would be lower, it would not have the ability to 'stop' already committed growth, and such growth would exceed that low housing requirement 'target'.

### Justification

Option 1 and 4 provides an equal outcome. Options 2 and 3 are more uncertain, and with a mix of negative, positive and uncertain outcomes. Option 1 is preferred as this is more closely aligned to national policy than the other options.

Appendix B. Evaluate the likely effects of the GROWTH 1 policy and alternatives

<b>GROWTH 1- Level of Growth</b>				
<b>SA Objective</b>	<b>Option 1 Growth delivered in accordance with the Government's standard method</b>	<b>Option 2 No Policy, rely on national policy</b>	<b>Option 3 Provide for a higher level of growth than Government's standard method</b>	<b>Option 4 Provide for a lower growth than the Government's standard method</b>
1.1 Undeveloped land	~	?	-	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	Difficult to predict the impact of this option as quantum of growth is unknown.	This option would have negative effect as it is most likely that majority of the growth will have to be located on undeveloped land.	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
1.2 Energy use	~	?	-	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	At this stage it is unclear what impact this policy option will have on energy use.	Higher growth would generate the need for more energy mostly from non-renewable sources.	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development.
1.3 Water consumption	~	?	-	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	At this stage it is unclear what impact this policy option will have on water consumption.	Higher growth would generate the need for more water and increased consumption.	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
2.1 Nature sites and species	~	?	?	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	At this stage it is unclear what impact this policy option will have on nature sites and species.	At this stage it is unclear what impact this policy option will have on nature sites and species.	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
2.2 Biodiversity	~	~	~	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	Policy option is not relevant to this objective.	Policy option is not relevant to this objective.	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development.
2.3 Access to wildlife	~	~	~	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	Policy option is not relevant to this objective.	Policy option is not relevant to this objective.	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development.
3.1 Historical assets	~	~	~	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	Policy option is not relevant to this objective.	Policy option is not relevant to this objective.	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development.
3.2 Landscape / townscape character	~	~	~	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	Policy option is not relevant to this objective	Policy option is not relevant to this objective	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
3.3 Design and layout	~	~	~	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	Policy option is not relevant to this objective	Policy option is not relevant to this objective	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development

**GROWTH 1- Level of Growth**

SA Objective	Option 1 Growth delivered in accordance with the Government's standard method	Option 2 No Policy, rely on national policy	Option 3 Provide for a higher level of growth than Government's standard method	Option 4 Provide for a lower growth than the Government's standard method
4.1 Pollutants	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	~ Policy option is not relevant to this objective	~ Policy option is not relevant to this objective	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
4.2 Waste production	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	~ Policy option is not relevant to this objective	~ Policy option is not relevant to this objective	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
4.3 Climate change	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	~ Policy option is not relevant to this objective	~ Policy option is not relevant to this objective	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
5.1 Health	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	~ Policy option is not relevant to this objective	~ Policy option is not relevant to this objective	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
5.2 Crime	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	~ Policy option is not relevant to this objective	~ Policy option is not relevant to this objective	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
5.3 Open space	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	~ Policy option is not relevant to this objective	~ Policy option is not relevant to this objective	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
6.1 Accessibility	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	~ Policy option is not relevant to this objective	~ Policy option is not relevant to this objective	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
6.2 Inequalities	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	? At this stage it is unclear what impact this policy option will have on inequality.	+++ Providing housing that more than meets the needs of all in the community will help to reduce inequality	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
6.3 Housing need	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	? At this stage it is unclear what impact this policy option will have on housing need.	+++ Providing housing that more than meets the needs of all in the community will help deliver local plan objectives.	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
6.4 Community involvement	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	~ Policy option is not relevant to this objective	~ Policy option is not relevant to this objective	~ Neutral effect, as the option would have no material affect on growth levels or sites allocated for development

**GROWTH 1- Level of Growth**

SA Objective	Option 1 Growth delivered in accordance with the Government's standard method	Option 2 No Policy, rely on national policy	Option 3 Provide for a higher level of growth than Government's standard method	Option 4 Provide for a lower growth than the Government's standard method
7.1 Access to work	~	?	+++	~
	. Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	At this stage it is unclear what impact this policy option will have on access to work.	Providing employment opportunities that more than meets the needs of all in the community will provide greater access to work.	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
7.2 Investment	~	~	++	~
	. Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	Policy option is not relevant to this objective.	Housing development will provide investment in including infrastructure and community facilities	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development
7.3 Local economy	~	~	~	~
	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development	Policy option is not relevant to this objective.	Policy option is not relevant to this objective.	Neutral effect, as the option would have no material affect on growth levels or sites allocated for development.

**Commentary**

*Summary of assessment* – As shown in the table, the preferred approach does not always have the most positive impact than other options considered in particular higher growth (option 3). Higher growth could produce some positive benefit in that it will provide greater choice in housing, investment and create more employment opportunities. But higher growth also has more negative impact on the environmental objectives such as more greenfield sites will have to be used. There are also more uncertainties with higher growth than the preferred option. Overall, it is considered the policy (option1) will have no negative impact, as well as being the most aligned to national policy. Options 2 and 4 are unlikely to pass the test of being in accordance with national policy, and in any effect, do not perform materially better than the preferred option. Many of the effects of the options are unclear at this stage. This is because of the strategic nature of the Local Plan objectives and policies, and therefore there are uncertainties surrounding their implementation and outcomes in practice.

*Summary of mitigation measures* – Need to ensure that new developments are accompanied by necessary improvements in infrastructure, community facilities and by local jobs growth. Need to ensure new developments are of high-quality design and minimise impact on the natural and built environment, and climate change.

**Preferred option – Option 1**

## Appendix C: Sustainability Objectives and Monitoring Indicators

Sustainability Appraisal Objective	Indicator
1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings	Percentage of dwellings completed on previously developed land
	Net density of dwellings
1.2 Reduce the use of non-renewable energy sources	Average Consumption of Domestic Gas (kwh)
	Average Consumption of Domestic Electric (kwh)
1.3 Limit water consumption to levels supportable by natural processes and storage systems	Water use per household
2.1 Avoid damage to designated statutory and non-statutory sites and protected species	Percentage of SSSIs in favourable or unfavourable recovering condition
2.2 Maintain and enhance the range and vitality of characteristic habitats and species	Total area designated as SSSI and CWS (ha)
2.3 Improve opportunities for people to access and appreciate wildlife and wild places	Percentage of rights of way that are easy to use
3.1 Avoid damage to areas and sites designated for their historic interest, and protect or enhance their settings	Number of listed buildings 'at risk'
	Percentage of conservation areas with a conservation area appraisal

<b>3.2 Create places, spaces and buildings that work well, wear well and look good</b>	Percentage of residents satisfied with their neighbourhood
	Percentage of new homes developed to Ecohomes good or excellent standard
<b>4.1 Reduce emissions of greenhouse gases and other pollutants (including air, water, soil, noise, vibration and light)</b>	Total CO <sub>2</sub> emissions per year (kilotonnes)
	Annual average concentration of nitrogen dioxide (µg/m <sup>3</sup> )
	Percentage of main rivers of good or fair quality (chemical and biological)
<b>4.2 Minimise waste production and support the recycling of waste products</b>	Household waste collected per person per annum (kg)
	Percentage of household waste which is recycled
<b>4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)</b>	Number of planning permissions granted contrary to Environment Agency advice
<b>5.1 Maintain and enhance human health</b>	Life expectancy at birth
<b>5.2 Reduce and prevent crime, and reduce the fear of crime</b>	Number of recorded crimes per 1,000 people
	Percentage of residents feeling 'safe' or 'fairly safe' outside in the local area after dark
<b>5.3 Improve the quantity and quality of publicly accessible open space</b>	Amount of strategic open space per 1,000 people (ha)
	Number of sports pitches available for public use
	Amount of informal open space (ha)

	Number of play areas
<b>6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, leisure opportunities)</b>	Proportion of new dwellings completed within 30 mins public transport of all key services <sup>1</sup>
<b>6.2 Redress inequalities related to age, gender, disability, race, faith, location and income</b>	Percentage of residents who feel that people from different backgrounds get on well together
	Index of multiple deprivation (rank - 1 is most deprived and 354 is least deprived)
<b>6.3 Ensure all groups have access to decent, appropriate and affordable housing</b>	Housing affordability (lower quartile affordability ratio)
	Percentage of dwellings completed that are affordable
<b>6.4 Encourage and enable the active involvement of local people in community activities</b>	Percentage of adults who feel they can influence decisions affecting their local area
	Percentage of adults who have given support to non-relations in the past year
<b>7.1 Help people gain access to satisfying work appropriate to their skills, potential and location</b>	Unemployment rate
<b>7.2 Support appropriate investment in people, places, communications and other infrastructure</b>	Percentage achieving 5+ GCSEs grades A*-C
<b>7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy</b>	Annual net change in VAT registered firms
	Economically active

<sup>1</sup> Includes employment area, town centre, GP surgery, hospital, primary school and secondary school

## Appendix D: Abbreviations used in this report

BAP	Biodiversity Action Plan
BREEAM	Building Research Establishment Environmental Assessment Methodology
CAMS	Catchment Abstraction Management Strategy
CHP	Combined Heat and Power
CIL	Community Infrastructure Levy
CO <sub>2</sub>	Carbon Dioxide
CPRE	Campaign to Protect Rural England
DCLG	Department of Communities and Local Government
DECC	Department of Energy and Climate Change
DPD	Development Plan Document
EA	Environment Agency
GCSE	General Certificate of Secondary Education
GI	Green Infrastructure
GTANA	Gypsy and Traveller Accommodation Needs Assessment
GVA	Gross Value Added
HMA	housing Market Area
IMD	Indices of Multiple Deprivation
kWh	kilowatt hour
kWp	kilowatt peak
LDS	Local Development Scheme
LED	Light Emitting Diode
LNR	Local Nature Reserve
LSOA	Lower Super Output Area
MWDF	Minerals and Waste Development Framework
MWh	Megawatt hour
NE	Natural England
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NVZ	Nitrate Vulnerable Zone
OAN	Objectively Assessed Need
ONS	Office of National Statistics
PCPA	Planning and Compulsory Purchase Act
RIGS	Regionally Important Geological and Geomorphological Site
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SINC	Site of Importance for Nature Conservation
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage Systems
WFD	Water Framework Directive