

# Cabinet Report Appendix 3

## CALDERDALE LOCAL PLAN

### SUSTAINABILITY APPRAISAL OF LOCAL PLAN MAIN MODIFICATIONS

Calderdale Metropolitan Borough Council

2022



## Local Plan: Main Modifications Sustainability Appraisal

### 1. Background

1.1 This document is the Sustainability Appraisal of the Local Plan Main Modifications. The Inspector confirmed in their letter of the 21<sup>st</sup> March that she considered that the submitted Local Plan was, subject to main modifications, the Plan is likely to be capable of being found legally compliant and sound.

1.2 The Calderdale Local Plan ('CLP') was submitted to government for examination in January 2019. Due to a number of factors, including the coronavirus pandemic, the Examination in Public took place over the next 3 years, with a number of different hearing stages.

1.3 During the EiP, a number of proposed Main Modifications were proposed by the Inspector and the Council, to ensure the plan was legally sound.

1.4 A Sustainability Appraisal has been carried out on the Main Modifications and will be submitted for public consultation alongside the other Local Plan Main Modifications documents. The SA of the Main Modifications has been carried out using the same methodology applied by the council for the previous stages of the Local Plan preparation.

1.5 This latest SA also includes a section on the previous work of the SA in Appendix 1, which allows the reader to follow the process of SA which has been an iterative process ongoing through the various stages of the Local Plan preparation.

### 2 SA of the CLP Main Modifications

2.1 The purpose of this SA Report is to clearly set out the method and findings of further SA work carried out on the proposed CLP Main Modifications.

2.2 The SA of the CLP Main Modifications has been carried out in accordance with the SEA regulations and the National Planning Policy Framework.

2.3 The report consists of the following sections:

- Section 3 summarises the previous SA work carried out
- Section 4 explains the methodology for carrying out SA
- Section 5 summarises the finding of the SA of the CLP Main Modifications
- Section 6 sets out a concluding summary and the next steps for the CLP and the SA
- Section 7 Appendices

### 3. Previous SA Work

3.1 This section presents an audit trail on the earlier stages of the Sustainability Appraisal (Incorporating Strategic Environmental Assessment) carried out on the CLP.

3.2 As previously set out in earlier SA documents, the majority of the Local Plan policy options and Spatial options commenced as part of the now abandoned Local Development Framework

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approach, which would have resulted in two separate documents; a 'Core Strategy' which would have set out the strategic policy, and a separate document, the 'Land Allocations Development Plan document', which would have included site allocations and Development Management policies. A full listing of SA documents is presented in Appendix 1.

3.3 The table in Appendix 2 provides an audit trail of all of the policies in the Local Plan as to where they were first proposed, and at which stage they were subject to SA. The majority of the policies were developed from the Local Development Framework Options, and the SA Summary and reasons for rejecting or pursuing the policies are available to view in the Reasons for Policies document.

3.4 A number of policies emerged later in the Local Plan process and the second part of the table lists these policies and under which SA it was considered.

3.5 There are a number of documents that form the SA of the Local Plan which for ease of reference are listed below with the relevant Examination Library reference:

- For policies the documents are:
  - Core Strategy Sustainability Appraisal Report 2012 (PC02.3)
  - Core Strategy 'Reasons for Policies' 2012 (PC02.4)
  - Sustainability Appraisal of Local Plan Initial Draft 2017 (SD03.1)
  - Sustainability Appraisal of Local Plan Publication Draft 2018 (SD03.2)
  - Sustainability Appraisal Update – Additional Housing Supply 2019 (CC33)
  
- For sites the documents are:
  - Sustainability Appraisal of Local Plan Initial Draft 2017 (SD03.1)
  - Sustainability Appraisal of Local Plan Publication Draft 2018 (SD03.2)
  - Sustainability Appraisal Update – Additional Housing Supply 2019 (CC33)
  - Sustainability Appraisal of Filtered Sites 2021 (CC146)

3.6 At the end of the hearing sessions, the Inspector requested the council clarify which reasonable alternative policy options (aside from housing requirement/distribution options) were appraised and reasons for rejected options not being taken forward.

3.7 In relation to the early SA work on the policy options, the Council published a document entitled the 'Core Strategy Refined issues and Options' which was subsequently appraised by the SA. The 'Core Strategy Reasons for Policies' document included a SA summary of that work, and the reasons for not taking some policy and spatial options forward.

3.8 The reasonable strategic Policy Options that have been appraised are as follows:

- Town Centre Strategy (SA of CS RI&O) - Core Strategy Sustainability Appraisal Report 2012 (PC02.3)
- Pepper Potting or Garden Suburbs - Sustainability Appraisal of Local Plan Publication Draft 2018 (SD03.2)
- Spatial Strategy and Distribution - Sustainability Appraisal of Local Plan Initial Draft 2017 (SD03.1)

- Additional Housing Requirement and Supply Options - Sustainability Appraisal Update 2019 (CC33)

### **Town Centre Strategy**

3.9 In relation to the Town Centre Strategy policy options, the Core Strategy Reasons for Policies Document (Document reference PC02.4, 2012) sets out that Policy Options that were put forward in relation to the future retail hierarchy for Calderdale, within the context of retail needs the two options put forward were as follows:

- Option 1 to 'maintain and strengthen the current role of all existing centres', or
- Option 2 to 'enhance or decrease the role of a specific centre in relation to the current retail hierarchy'.

3.10 The majority of responses received from the consultation process preferred Option 1, also it was considered that Option 1 aligned closer to the aims of the Sustainable Community Strategy and Local Area Agreement to 'create and support dynamic and vibrant town centres' in that all centres will at least be maintained, if not strengthened, as opposed to Option 2. The SA was generally more positive about Option 1.

3.11 The SA identified that there could be potential negative effects arising from option 2 on objectives SA3, to create and retain healthy vibrant and inclusive communities, SA4, 'To Encourage Increased Participation in Cultural, Leisure and Recreation Activities' and SA5 'To Improve Accessibility to Essential Services, Facilities and Employment' as decreasing a role of a centre could impact on these by increasing social exclusion and lack of accessibility to services, whilst there was also a negative effect on SA 17 'Enhance the Viability and Vitality of the Town Centres'. Therefore Option 1 was the preferred SA option.

### **Garden Suburb vs Pepper Potting Approach**

3.12 The consideration of the spatial distribution of housing development for the Local Plan has been the relative merits of a larger number of more modest allocations 'pepper-potted' throughout the district versus a smaller number of large strategic allocations, the 'Garden Suburb' approach.

3.13 The SA of both approaches is documented in the SA of Local Plan Publication Draft (2018, SD03.2). The conclusion in the SA in respect of the approaches is overall, the strategy of pursuing a garden suburb approach resulted in a greater number of positive effects on the SA objectives compared to the pepper potting approach.

3.14 The positive effects were recorded across social, environmental, and economic themes. Focusing development on a smaller number of strategic allocations is considered to offer a particular opportunity for sustainable development because such sites are of sufficient scale to provide a planned 'garden village' layout with enhanced local facilities and infrastructure. In this sense it is possible to manage and mitigate impacts in a more holistic manner.

3.15 Adopting an approach that delivered a pepper potting approach would risk a dispersed pattern of development that would risk the coordinated delivery of infrastructure requirements resulting from the cumulative impact of a large number of smaller sites.

3.16 It is also true that the SA has reinforced the desire to avoid placing increased pressure on the upper valley, which lessens the potential increased flood risk resulting from development in this area.

3.17 It is acknowledged that whichever approach is adopted, the landscape and Green Belt will be impacted. In addition, the effect of traffic on the environment will increase, at least in the short term. However, in securing transport related infrastructure through a critical mass of development, this could mitigate the impacts over the medium to long term.

3.18 The SA drew a number of conclusions in relation to the two approaches and the impacts of both; both were seen to record negative impacts on SA8 and reducing the effect of traffic on the environment and SA11 and landscape. However, in relation to the Garden Suburb approach, it was considered that mitigation of these would be easier to achieve through the transport improvements to be delivered along key travel corridors in south east Calderdale; whilst Masterplanning can secure an efficient use of the land in terms of a mix of uses and deliver a number of facilities (e.g. Schools, community facilities) that also reduce the need to travel. Achieving a co-ordinated mitigation approach to the negative impacts on the SA Objectives would be much harder to deliver compared to the critical mass that would be delivered through the Garden Suburbs.

### **Spatial Strategy and Distribution**

3.19 The Spatial Strategy and Distribution options were subject to SA in the 2017 document, the SA of Local Plan Initial Draft 2017 (SD03.1). A number of 'Notional Distributions' were assessed in the preparation of the Initial Draft of the Local Plan and these were as follows:

- Notional Distribution A - Numerically the same in all towns as the Preferred Options, although the residual of the Local Plan housing requirement is allocated to Brighouse;
- Notional Distribution B - Based on the percentage of proposed dwellings allocated to each area in 2012 Preferred Options Distribution and applying this percentage to the Local Plan housing requirement, with the residual of the requirement again allocated to Brighouse;
- Notional Distribution C - Numerically the same in all towns as the Preferred Options, apart from Halifax where the allocation was based on the size of the existing settlement in terms of dwelling numbers, with the remainder of the Local Plan housing requirement allocated to Brighouse;
- Notional Distribution D - Todmorden, Sowerby Bridge, and Hebden Bridge are allocated in line with the land available in the relevant settlements, the remaining settlements apart from Brighouse are allocated dwellings based on the percentage of the Preferred Options distribution applied to the updated Local Plan requirement, with any residual dwellings allocated to Brighouse;
- Notional Distribution E - This option is based on the proportion of the Borough's existing dwellings in each settlement, and applying this to the Local Plan housing requirement apart from Todmorden, Sowerby Bridge, and Hebden Bridge which are allocated in line with the Preferred Options, the residual dwellings are again allocated to Brighouse;

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- Notional Distribution F - Again Todmorden, Sowerby Bridge, and Hebden Bridge are allocated the same number of dwellings as the Preferred Options, the Halifax allocation is based on the distribution of existing dwellings by settlement, whilst the remaining areas (Ryburn Valley, Northowram / Shelf, Mytholmroyd / Luddenden and Elland) apart from Brighouse are allocated dwellings based on their relevant percentage in the Preferred Options and applied to the Local Plan housing requirement, with the remainder of the requirement allocated to Brighouse.

3.20 These notional distribution scenarios helped in establishing the strategic issues associated with differing levels of development in each of the Local Plan Areas. These strategic issues can be summarised as:

- All Notions of Distribution would provide significant benefits with regards to additional housing and employment land;
- All Notions of Distribution record a positive impact against the SA Objectives concerned with housing provision (SA1), efficient use of land (SA13), providing good employment opportunities for all (SA15), and achieving business success and sustainable economic growth (SA16);
- All Notions of Distribution will have the potential to create significant effects on biodiversity (SA9), the character of the landscape and settlements (SA11), as well as the impacts on the transport network and associated levels of pollution (SA8);
- Focus on the eastern part of the Borough could have negative impacts on the western areas, for example access to housing and employment opportunities;
- Focus on the eastern part of the Borough would lessen the potential pressures on the SPA / SAC and associated SSSI's arising from an increased population (SA9, SA11) , although there may be potential impacts from development within the Halifax area on protected areas in the northern part of the Borough;
- Focus on the eastern part of the Borough would provide opportunities to mitigate adverse effects through master planning and coordinating development with transport improvements (SA8);
- There is a degree of uncertainty that would only be resolved by assessing individual sites and policies.

3.21 The full SA of the above is presented in Appendix 7 of the SA of the Initial Draft of the Local Plan (2017, Document reference SD03.1).

3.22 In summary, the Local Plan Initial Draft distribution focused development on the eastern part of the Borough, with significant levels of growth allocated in Brighouse, Halifax, Elland and the Northowram / Shelf Local Plan areas.

3.23 With regards to the SA, these areas reduce the potential negative impacts on the internationally designated SPA /SAC, whilst also being accessible and offering opportunities to result in positive impacts on the economic and social SA Objectives. In terms of mitigating the effects of the scale of development proposed in these areas, the Local Plan will need to enforce specific and appropriate requirements to secure benefits for existing and new residents. The SA assessment of individual sites provides the opportunity for the SA to establish the potential impacts at a more localised level.

3.24 In terms of the SA conclusion on the above notions, those which promoted a higher level of development in the east result in a more positive approach in relation to mitigating issues of flood risk (SA7) pressure on the SPA /SAC (SA9) and provide a more coordinated approach to mitigate transport impacts (SA8) and landscape impacts (SA11). The strategic nature of the Notions of

Distribution meant that there were a number of uncertainties at the time of the assessment; however, the SA reinforced that higher levels of development in the east of Calderdale could be mitigated more positively than implementing a higher level of development in the smaller settlements and constrained Ryburn and Upper Calder Valley's.

### **SA of Housing Requirement Update and Supply**

3.25 As part of the SA of Main Modifications the Inspector requested that the council include a conclusion on the housing supply options presented as part of the Housing Requirement Update paper (CC39 in the Examination Library). The options were as follows:

- Option 1) Maintain the housing requirement at 840dpa and reduce expected economic growth to below the existing baseline figure (6,441 additional jobs);
- Option 2) Increase the housing requirement to 910dpa and reduce expected economic growth to the baseline figure (7,791 additional jobs);
- Option 3) Increase the housing requirement to 1,040dpa and maintain expected economic growth at the current policy-on plus transport level (10,318 additional jobs).
- Option 4) Increase the housing requirement to (on average) 997dpa which supports the 'policy-on with transport' economic growth aspirations and also takes into account the uncertainty in assumptions built into the forecasting model.

3.26 The SA demonstrated the council's Preferred Option was option 4. Option 1 would deliver the least number of new homes and Affordable Housing. The same option would also have resulted in additional in commuting if the economic ambition of the plan were not reduced, and the SA identified this approach would undermine economic growth and efforts to reduce economic inequality.

3.27 Option 2 was considered to offer an increase in housing delivery compared to option 1, however there would still be an undersupply. This option would enable less potential for investment in sustainable transport in comparison to options 3 and 4, there would however be a greater traffic impact than option 1. As with option 1, should this option be pursued and if existing in-commuting patterns are maintained this would undermine economic growth and efforts to reduce economic inequality.

3.28 Option 3 would have delivered the highest number of new homes and therefore scored strongly in terms of the relevant SA Objectives. The increased level of growth would also support greater investment in transport infrastructure. In relation to the economic objectives, the option would have the strongest positive impact in relation to supporting economic growth and therefore the creation of jobs, which would reduce economic inequality and poverty. In addition, this option would maintain existing commuting patterns.

3.29 Option 4 would deliver the housing requirement and would leave only a very minimal affordable housing shortfall. The level of development would also support potential investment in transport infrastructure. The approach would have a strong positive impact in relation to supporting economic growth and therefore the creation of jobs, which would reduce economic inequality and poverty. This approach would maintain existing commuting patterns.

3.30 As with all the options, there were some potential negative impacts in relation to some of the environmental objectives; however, the Local Plan policies ensure that issues around such

elements as flood risk and biodiversity are addressed through the site-specific considerations and the impacts are mitigated.

3.31 In conclusion, options 1 and 2 would result in an undersupply of housing, and limit the opportunities to invest in sustainable travel, in commuting levels would also preclude economic growth. option 3 results in the stronger positive effects against the SA objectives compared to the options 1 and 2. In relation to social and economic objectives, option 3 promotes increased housing choice, social inclusion, economic growth, investment in transport and although the option would have a greater impact in terms of Green Belt, the additional sites required compared to the other options have been subject to SA and this will have identified any necessary mitigation measures. In terms of option 4, again this results in a positive impact on social and economic objectives, although as is the case with option 3, this would have a greater impact on the Green Belt but slightly less of an impact than option 3.

3.32 There was a further SA carried out of the approach to supply required to facilitate 997dpa, which supports the 'policy-on with transport' economic growth aspirations and also takes into account the uncertainty in assumptions built into the forecasting model.

### **Housing Supply**

3.33 In relation to housing supply the Cabinet Paper dated October 2019 presented two options;

1) The first option was to extend the application of the existing site allocations methodology to the identification of additional housing supply. This was described as 'Standard Option' (Option A).

2) The second option requires the Council to revisit a number of assumptions in a manner that requires greater ambition and optimism. This approach was described as the 'Sustainable Option' (Option B).

### **SA Summary**

3.34 The two options were subjected to SA and a summary of the outcomes is presented below, based on the three distinct elements of the SA assessment, which are social, environmental and economic impacts.

### **Social**

3.35 Both options that were subject to assessment were considered to have a positive social impact, primarily due to both approaches involving the supply of land to deliver the Borough's housing need within the lifetime of the plan. The implementation of both options would result in a marginal shortfall of 121 units on affordable housing requirements and subsequently help to ensure that a higher proportion of the Borough's population would be in the right type and tenure of housing, increase housing choice, and contribute to reducing social exclusion. Notably, there is less certainty with Option B – 'Sustainable Option in terms of the delivery of affordable housing due to the higher costs associated with the development of brownfield sites.

3.36 While the differences between the two options would not affect the overall result, the increased capacities on town centre, mixed-use allocations in Option B, would result in a more positive outcome due to a greater access to essential services, facilities and employment opportunities. Further, Option B has a slightly greater scope to support the delivery of public

transport infrastructure through the delivery of higher densities in central locations close to public transport hubs.

3.37 In terms of employment opportunity, there is a positive impact as both options aim to meet the revised local housing need, which is a significant factor in attracting and retaining a skilled workforce. The options would have a strong positive impact in relation to supporting economic growth and therefore the creation of jobs, which would reduce economic inequality and poverty. Option B would result in a slightly more positive outcome due to the higher level of employment opportunities available in town centre locations.

### **Environmental**

3.38 In relation to the environmental impacts of the two options, while the overall outcome in terms of scoring would be the same, there would be slightly different impacts when the various objectives were looked at in further detail.

3.39 Option A – ‘Standard Option would have a greater impact on the Green Belt and the natural and semi-natural landscape. There would also be a potentially greater effect on biodiversity, flood risk and traffic related impacts such as air quality and congestion, although the site assessment process and SA assessment will have identified the necessary mitigation measures to ensure any possible impacts are minimised.

3.40 Option B would support sustainable travel choices to a greater extent and therefore have a more positive impact on congestion, air quality and climate change. It would also be more beneficial with regard to the reduction of derelict and degraded land and the use of previously developed sites within and around town centres. By increasing densities in central locations, close to public transport hubs, approach 2 also provides a greater scope to support the delivery of public transport infrastructure, increasing opportunity for sustainable travel modes for prospective residents.

### **Economic**

3.41 The assessment indicates that both options would have a positive impact on the economic objectives of the SA. The level of housing and economic growth proposed by both options would result in a strong positive impact in relation to supporting economic growth and therefore the creation of new jobs, and as a result reduce economic inequality and poverty. Increased local populations will help ensure there is a larger local labour supply for local firms, and also result in additional spending in local shops and town centres.

3.42 Option B however would have the strongest positive impact due to the development of derelict land contributing to the regeneration of town centres and ensuring prospective residents have good access to a range of employment opportunities.

### **Conclusion of SA**

3.43 Overall, it is considered that Option B results in the stronger positive effects against the SA objectives compared to the other approach. In relation to social, environmental and economic objectives, Option B promotes increased housing choice, social inclusion, economic growth, sustainable travel choices and facilitates the reuse of derelict land in and around town centre locations. Although both approaches would have an impact on the Green Belt, Option B would have a lesser impact on this, and other environmental factors such as biodiversity and the protection of natural and semi-natural landscapes.

3.44 The full SA of the housing requirement options update and the conclusions can be found in Appendix 3.

3.45 The additional housing sites proposed in CC39 which were all subject to a full SA and can be viewed in Appendix 4C to this report and also in the Examination Library in the document entitled ‘Sustainability Appraisal Update – Additional Housing Supply’ (December 2019) CC33.

#### 4 SA Methodology

4.1 The Methodology for carrying out the SA of the Main Modifications was the same as the SA approach to the previous stages of the Local Plan. The SA Framework was developed through a number of SA stages, and this was used to consider the potential impacts of the changes that would occur through the Main Modifications.

4.2 The following table is the SA Framework that was applied to the previous versions of the Local Plan and applied again in carrying out the SA of the Main Modifications. Each SA Objective is supported by a number of Decision-Making Criteria, which are a series of questions used to establish the potential impacts of the Local Plan's Objectives, policy and site options. Alongside the Decision-Making Criteria, each SA Objective has a number of relevant indicators, which will be used as the plan progresses to monitor the plan's impacts across the district.

Table 10.1 Sustainability Appraisal Framework	
SA Objective	
1. TO ENSURE QUALITY HOUSING IS AVAILABLE TO EVERYONE	<b>Decision Making Criteria For Local Plan</b>
	<ul style="list-style-type: none"> <li>• Will it reduce homelessness?</li> <li>• Will it increase the range and affordability of housing for all social groups?</li> <li>• Will proposal affect opportunities to live in good quality and affordable housing?</li> <li>• Will it reduce the number of unfit homes?</li> </ul>
	<b>Indicators</b>
	<ul style="list-style-type: none"> <li>• Delivery                             <ul style="list-style-type: none"> <li>○ Annual net increase to housing stock;</li> <li>○ Housing Trajectory (completions in relation to dwelling requirement);</li> <li>○ Evidence of deliverable 5 year housing land supply;</li> <li>○ Number of housing completions per annum by type and size;</li> <li>○ Number of net additional Gypsy and traveller pitches</li> <li>○ Gross Affordable Housing Completions per annum;</li> <li>○ Number of affordable homes on rural exception sites;</li> </ul> </li> <li>• Quality                             <ul style="list-style-type: none"> <li>○ % of households with no central heating</li> <li>○ % of households experiencing fuel poverty (under the Low income high costs indicator)</li> <li>○ Number of dwellings built to Lifetime Homes Standards;</li> <li>○ Number of unfit homes per 1000 dwellings.</li> </ul> </li> <li>• Tenure                             <ul style="list-style-type: none"> <li>○ % of private rented</li> <li>○ % of social housing</li> <li>○ Number of households on Housing Register;</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>○ Number of households unintentionally homeless and in priority need;</li> <li>○ % of households owner occupied. (Owned outright, with mortgage/loan, shared ownership)</li> <li>● Affordability             <ul style="list-style-type: none"> <li>○ Median average house price</li> <li>○ House price to income ratio (Based on Householders Aged 20-39 &amp; 2-3 Bedroom House).</li> </ul> </li> </ul> <p><b>Targets</b></p> <ul style="list-style-type: none"> <li>● As per Housing Requirement Figure</li> <li>● Number of Affordable Homes as per SHMA;</li> <li>● Provision of sufficient pitches to meet need identified in GTAA</li> </ul>
<p><b>2. TO IMPROVE SAFETY AND SECURITY FOR PEOPLE AND PROPERTY</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>● Will it reduce levels of crime?</li> <li>● Will proposal affect personal / community safety (including protection from antisocial behaviour), fear of crime, or crime rates?</li> <li>● Will it reduce the fear of crime?</li> </ul>
	<p><b>Indicators</b></p>
	<ul style="list-style-type: none"> <li>● Offences per 1000 population – against British Crime Survey seven key offences comparator</li> <li>● Violence against the person per 1000 population</li> <li>● Burglary offences per 1000 population</li> <li>● Theft of a vehicle per 1000 population</li> <li>● Theft from a vehicle per 1000 population</li> <li>● Number of cyclist road accident casualties</li> <li>● Number of pedestrian road accident casualties</li> <li>● Number of people killed or seriously injured in road traffic accidents</li> </ul>
<p><b>Targets</b></p>	
<ul style="list-style-type: none"> <li>● Reduction in the number of people Killed or seriously injured in road traffic accidents;</li> <li>● Others to be established</li> </ul>	
<p><b>3. TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>● Will it foster inclusive communities?</li> <li>● Will proposal affect people’s sense of belonging, social support, and social interaction?</li> <li>● Will proposal affect people’s opportunities to adopt healthy lifestyles, seek employment, access community organisations?</li> <li>● Will proposal increase access to unhealthy food (e.g. take-aways)</li> <li>● Will it reduce health inequalities?</li> <li>● Will proposal ensure a sustainable impact on wellbeing and health, and on tackling inequalities?</li> </ul>
	<p><b>Indicators</b></p>
	<ul style="list-style-type: none"> <li>● Population Growth / Change</li> <li>● Infant mortality rate: deaths up to 1 year per 1,000 live births.</li> <li>● Standardised all age all cause mortality rate;</li> </ul>

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	<ul style="list-style-type: none"> <li>• % of population experiencing bad or very bad health;</li> <li>• Life expectancy at birth</li> <li>• School/Educational attainment</li> <li>• Healthy Life Expectancy</li> <li>• Smoking prevalence</li> <li>• Premature death due to air quality</li> <li>• Public Health Outcomes Framework Physical activity indicator</li> <li>• Indices of deprivation indicator</li> <li>• % of obese children (reception age);</li> <li>• % of obese children (year 6)</li> <li>• % of obese adults;</li> </ul>
	<p><b>Targets</b></p>
	<ul style="list-style-type: none"> <li>• To be established</li> <li>• No hot food takeaway to be provided within 400m of a secondary school</li> </ul>
<p><b>4. TO ENCOURAGE INCREASED PARTICIPATION IN CULTURAL, LEISURE, AND RECREATION ACTIVITIES.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>• Will it improve the accessibility and affordability of cultural, leisure and recreation facilities?</li> <li>• Will it safeguard, maintain and enhance existing community and cultural facilities?</li> <li>• Will proposal increase access to leisure / recreation facilities for those with the greatest needs?</li> <li>• Will it provide access to the countryside or green space for recreation and enjoyment?</li> <li>• Will proposal affect open / green space, places for play and social interaction, access to local countryside?</li> <li>• Will it lead to improved levels of green space?</li> <li>• Will it impact on accessibility to multi functional Green Infrastructure including Public Rights of Way, bridleways, cycle routes and footpaths?</li> <li>• Will it impact on the accessibility to National Trails?</li> </ul>
	<p><b>Indicators</b></p>
	<ul style="list-style-type: none"> <li>• Area of Playing Fields / Public Open Space lost to development.</li> <li>• No net loss of community or cultural facilities.</li> <li>• Total number of synthetic pitches (Per 1000 population)</li> <li>• Sports Hall Area (m2 per 1000 population)</li> <li>• % of households not within an area that meets the Access to Natural Green space Standards (ANGSt)</li> <li>• Number of parks awarded the Green Flag Award</li> <li>• % of adults doing 3 x 30 mins of sport per week</li> <li>• % of adults doing 1 x 30 mins of moderate intensity physical activity per week from Mixenden, Ovenden and Park Wards</li> <li>• Children &amp; Young people's satisfaction with parks and play areas</li> </ul>
	<p><b>Targets</b></p>
	<ul style="list-style-type: none"> <li>• Increase by 1% per year the % of adults doing 3 x 30 mins of sport per week</li> <li>• Increase of 4% over 3 years the % of adults doing 1 x 30 mins of moderate intensity physical activity per week from Mixenden, Ovenden and Park Wards.</li> <li>• All new publicly accessible greenspace should be delivered to meet an appropriate accessibility and quantity standard.</li> </ul>

<p><b>5. TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>• Will it ensure good quality accessibility to all the facilities and opportunities needed to support life and the quality of life?</li> <li>• Will the proposal affect access to services for those with greatest needs?</li> <li>• Will it affect demand for existing services?</li> <li>• Will it ensure better co location between place of residence and employment?</li> <li>• Will proposal affect access to food stores selling healthy and fresh produce?</li> <li>• Is the site within 400m of a bus stop?</li> <li>• Is the site within a 0-15 minute public transport journey of a Primary School?</li> <li>• Is the site within a 0-20 minute public transport journey of a Secondary School?</li> <li>• Is the site within a 0-20 minute public transport journey of a Primary Employment Area?</li> <li>• Is the site within a 0-15 minute public transport journey of a GP surgery?</li> <li>• Is the site within 0-15 minute public transport journey of a convenience store?</li> </ul>
	<p><b>Indicators</b></p>
	<ul style="list-style-type: none"> <li>• % of homes within 400m of a bus stop</li> <li>• % of residential properties within a 0-15 minute public transport journey of a Primary School</li> <li>• % of residential properties within a 0-20 minute public transport journey of a Secondary School</li> <li>• % of the resident population travelling over 20km to work</li> <li>• % of residential properties within a 0-20 minute public transport journey of a primary employment area.</li> <li>• % of residential properties within a 0-15 minute public transport journey of a doctors surgery;</li> <li>• % of residential properties within a 0-15 minute public transport journey of a convenience store.</li> </ul>
<p><b>Targets</b></p>	
<ul style="list-style-type: none"> <li>• To be established</li> </ul>	
<p><b>6. TO RETAIN, PROTECT AND CREATE A QUALITY, LOCALLY DISTINCTIVE BUILT AND HISTORIC ENVIRONMENT.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>• Will it lead to a high quality built environment and public realm?</li> <li>• Will it conserve those elements which contribute to the significance of area's heritage assets?</li> <li>• Would it reduce the numbers of designated heritage assets at risk in the Borough?</li> <li>• Will it affect the setting of a heritage asset?</li> </ul>
	<p><b>Indicators</b></p>
<ul style="list-style-type: none"> <li>• Number of historic parks and gardens;</li> <li>• Number of Scheduled Ancient Monuments, Conservation Areas, and Listed Buildings;</li> <li>• Number and percentage of the various types of designated heritage assets identified as being at risk;</li> <li>• Number of Class II sites of Special Archaeological Value;</li> <li>• Applications receiving national recognition of design best practice;</li> <li>• Applications subject to a design panel / design review.</li> </ul>	

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	<p><b>Targets</b></p> <ul style="list-style-type: none"> <li>• Reduction in the numbers of designated heritage assets identified as being at risk;</li> <li>• All consents affecting designated heritage assets to have an approved Conservation statement or Conservation Management Plan (where applicable).</li> </ul>
<p><b>7. TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p> <ul style="list-style-type: none"> <li>• Will it reduce the risk of flooding?</li> <li>• Will it prevent inappropriate development in flood risk areas?</li> <li>• Will it contribute to reduction of discharge into the Calder catchment and water retention in the uplands?</li> <li>• Will it reduce the potential to create washland in future?</li> </ul>
	<p><b>Indicators</b></p> <ul style="list-style-type: none"> <li>• Properties at risk of flooding as defined by the Environment Agency</li> <li>• Number of planning permissions granted contrary to the advice of the Environment Agency on flooding and water quality issues</li> <li>• Number of developments restricting surface water discharge to greenfield rates or better</li> </ul>
	<p><b>Targets</b></p>
	<ul style="list-style-type: none"> <li>• Zero planning permissions granted contrary to the advice of the Environment Agency on flood risk grounds</li> <li>• Zero enforcement cases under SUDS regulations</li> </ul>
<p><b>8. TO REDUCE THE EFFECT OF TRAFFIC ON THE ENVIRONMENT</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p> <ul style="list-style-type: none"> <li>• Will it reduce traffic volumes?</li> <li>• Will proposal affect how easy it is to access services by public transport, walking and cycling?</li> <li>• Will it lead to an increase of sustainable freight transport?</li> </ul>
	<p><b>Indicators</b></p> <ul style="list-style-type: none"> <li>• Estimated increase in traffic flows for cars (Million Vehicle KM)</li> <li>• Distances (miles) travelled per person per year by mode of transport;</li> <li>• Travel to work mode;</li> <li>• Bus passenger journeys (% of population);</li> <li>• Rail passenger journeys (% of population);</li> <li>• Levels of Rail Freight in the District</li> <li>• Growth in traffic levels;</li> <li>• Additional cycle / footpath creation;</li> <li>• Numbers of Active Travel Journeys;</li> <li>• Number of developments complying with Parking Standards.</li> <li>• The percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime.</li> <li>• The percentage of the population exposed to road, rail and air transport noise of 55dB(A) or more, during the night-time.</li> </ul>
	<p><b>Targets</b></p>
	<ul style="list-style-type: none"> <li>• 25% increase in bus journeys by 2026;</li> <li>• 50% increase in rail journeys by 2026;</li> </ul>

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	<ul style="list-style-type: none"> <li>• 50% increase in walking journeys by 2026;</li> <li>• 100% increase in cycling journeys by 2026.</li> <li>• Zero net growth in car trips by 2026 once trips generated by new development are accommodated.</li> </ul>
<p><b>9. TO PROTECT AND ENHANCE BIODIVERSITY AND GEODIVERSITY.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>• Will it protect, enhance and create diverse habitats for plants and animals to thrive in, including International, national and locally protected sites?</li> <li>• Will it impact on designated sites beyond the Borough boundary?</li> <li>• Will it protect and enhance European and nationally protected species and Biodiversity Action Plan species?</li> <li>• Will it protect existing patterns of wildlife movement or join up isolated areas of habitat or increase ecological connectivity within and across local authority boundaries?</li> <li>• Will it increase the vulnerability to climate change of a priority habitat or species?</li> </ul>
	<p><b>Indicators</b></p>
	<ul style="list-style-type: none"> <li>• Number, area and condition of SPA/SAC;</li> <li>• Number, area and condition of SSSI;</li> <li>• Number and area of Local Sites;</li> <li>• Change in areas of biodiversity importance;</li> <li>• % of Local Wildlife Sites where positive conservation management has taken place in the last 5 years;</li> <li>• Ancient Woodland cover;</li> <li>• Blanket Bog cover;</li> <li>• Upland Heathland cover;</li> <li>• Species Audit (through Calderdale Biodiversity Action Plan)</li> </ul>
<p><b>Targets</b></p>	
<ul style="list-style-type: none"> <li>• 95% of SSSI's to be in a 'favourable' or 'unfavourable but recovering' condition.</li> <li>• Meeting the targets for habitats and species established in the Local Biodiversity Action Plan.</li> <li>• No loss of ancient woodland or of veteran trees outside protected areas.</li> </ul>	
<p><b>10. TO REDUCE POLLUTION LEVELS AND CO2 EMISSIONS TO TARGET LEVELS.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>• Will it reduce greenhouse gas emissions in residential, business and transport sectors?</li> <li>• Will it improve the energy efficiency of buildings and services?</li> <li>• Will it increase renewable and low carbon energy use and / or generation?</li> <li>• Will it improve air quality?</li> <li>• Will it protect and seek to improve water quality?</li> <li>• Will proposal affect drinking water quality?</li> </ul>
	<p><b>Indicators</b></p>
<ul style="list-style-type: none"> <li>• Total district CO2 emissions (and for residential, business and transport sectors)</li> </ul>	

## SUSTAINABILITY APPRAISAL OF LOCAL PLAN MAIN MODIFICATIONS

	<ul style="list-style-type: none"> <li>• per capita carbon reduction trajectory in relation to local target</li> <li>• Monitored NOx levels (urban areas)</li> <li>• PM10 levels thousand tonnes</li> <li>• % of new development meeting the BREEAM 'Very Good' rating</li> <li>• Number of Air Quality Management Areas designated</li> <li>• % of river / canal length that is of good quality (Chemical)</li> <li>• % of river / canal length that is of good quality (Biological)</li> <li>• Number of Planning Permissions granted contrary to Health and Safety Executive (HSE) advice.</li> </ul>
	<p><b>Targets</b></p> <ul style="list-style-type: none"> <li>• Achieving a 40% reduction in CO2 emissions from a 2005 baseline;</li> <li>• The Climate Change Act (2008) contains a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, through actions both in the UK and overseas. The Act also requires a reduction in emissions of at least 34% by 2020.</li> <li>• Achieving reductions in emissions ahead of the national and local trajectories and targets.</li> <li>• Air Quality Action Plan Targets to be met.</li> <li>• 100% of water bodies to meet good ecological status or potential by 2027;</li> <li>• Nil planning permissions granted contrary to HSE advice</li> </ul>
<p><b>11. TO PROTECT AND ENHANCE THE NATURAL, SEMI NATURAL AND MAN MADE LANDSCAPE.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p> <ul style="list-style-type: none"> <li>• Will it protect and enhance the Green Belt / Area Around Todmorden?</li> <li>• Will it protect hedgerows?</li> <li>• Will it protect woodlands?</li> <li>• Will it protect upland heathland?</li> <li>• Will it protect blanket bog?</li> <li>• Will proposal affect the local production and availability of healthy and affordable food?</li> <li>• Will it protect unimproved grassland?</li> <li>• Will it protect rivers and streams?</li> <li>• Will it protect and enhance the landscape character of the district, including the objectives in relation to National Character Areas?</li> <li>• Will it protect good quality agricultural land (Grade 3)?</li> </ul> <p><b>Indicators</b></p> <ul style="list-style-type: none"> <li>• Green Belt Land Cover</li> <li>• Amount of Green Belt Land / Area Around Todmorden land developed</li> <li>• Area of species rich hedgerows</li> <li>• Ancient Woodland Cover</li> <li>• Area of Woodland Cover</li> <li>• Upland Heathland</li> <li>• Blanket Bog</li> <li>• Amount of agricultural Land (Grade 3) developed.</li> <li>• Area of unimproved grassland</li> <li>• % of peat bog and upland soils in favourable condition</li> </ul> <p><b>Targets</b></p> <ul style="list-style-type: none"> <li>• Biodiversity Action Plan (BAP) target is to Plant 10km of species rich hedgerows</li> <li>• BAP target is to ensure all native woodland wildlife sites are maintained in an ecologically favourable condition.</li> </ul>

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	<ul style="list-style-type: none"> <li>• BAP target to restore 5ha of upland oakwood, 150ha of lowland mixed deciduous woodland, and 5ha of wet woodland.</li> <li>• BAP target to create 20ha of upland oakwood, 40ha of lowland mixed deciduous woodland and 5ha of wet woodland.</li> <li>• BAP target to create or restore 200ha of Upland Heathland</li> <li>• BAP target to create or restore 100ha of blanket bog.</li> <li>• BAP target to restore 20ha and create 100ha of unimproved grassland.</li> <li>• Ensure all rivers, streams and wildlife sites e.g. SSSI, SEGIs or equivalent are maintained in an ecologically favourable condition.</li> <li>• BAP target to restore 5km of degraded river and stream habitat.</li> </ul>
<p><b>12. TO ENSURE PRUDENT AND EFFICIENT USE OF NATURAL RESOURCES AND ENERGY.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>• Will it ensure increased use of renewable and low carbon energy?</li> <li>• Will proposal utilise efficient / renewable sources of energy?</li> <li>• Will it reduce energy consumption and lead to energy efficient developments?</li> <li>• Will it reduce water consumption?</li> <li>• Will proposal make use of locally sourced and renewable materials?</li> <li>• Will it lead to a reduced use of primary aggregates and lead to recycling of materials?</li> </ul>
	<p><b>Indicators</b></p>
	<ul style="list-style-type: none"> <li>• Generation of electricity from renewable and low carbon sources</li> <li>• Levels of renewable and low carbon energy generated by type, including CHP.</li> <li>• Average annual domestic consumption of electricity per household</li> <li>• Average annual domestic consumption of gas</li> <li>• Total CHP Generation Heat (H) &amp; Electricity (E)</li> <li>• Daily domestic water consumption per head per day in litres</li> <li>• Number of mineral extraction sites</li> <li>• Production of primary land won aggregates (tonnes)</li> <li>• Production of secondary and recycled aggregates (tonnes)</li> <li>• Number of Mineral Planning Permissions granted;</li> <li>• Non mineral planning permissions granted within MSA without mineral resource assessment</li> <li>• Mineral extraction within MSA during Local Plan period.</li> </ul>
<p><b>Targets</b></p>	
<ul style="list-style-type: none"> <li>• UK committed to generate at least 15% of energy demand from renewable sources by 2020.</li> <li>• Contribution to sub regional aggregates apportionment;</li> <li>• Nil permissions granted for non mineral development within the MSA without mineral resource assessment.</li> </ul>	
<p><b>13. TO ENSURE EFFICIENT USE OF LAND.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>• Will it lead to the re-use of previously developed sites?</li> <li>• Will the proposal result in buildings and spaces that allow for adaptation, conversion, or extension?</li> <li>• Will it lead to higher density and/or mixed-use developments?</li> <li>• Will it reduce the amount of derelict and degraded land?</li> <li>• Will proposal bring disused buildings / spaces into productive use for benefit of local community?</li> </ul>

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	<p><b>Indicators</b></p> <ul style="list-style-type: none"> <li>• % of new housing completions built on brownfield land</li> <li>• Amount of employment floor space developed on brownfield land</li> <li>• % of dwellings vacant</li> <li>• Contribution of non-allocated sites to housing supply;</li> <li>• Proportion and number of sites that are windfalls;</li> <li>• Densities achieved on sites of up to 0.4ha</li> <li>• Densities achieved on sites of up to 0.4 to 2.0ha</li> <li>• Densities achieved on sites over 2.0ha</li> <li>• Average densities achieved on new build and conversion sites;</li> <li>• Densities achieved on brownfield and greenfield sites.</li> </ul> <p><b>Targets</b></p> <ul style="list-style-type: none"> <li>• To be developed</li> </ul>
<p><b>14. TO REDUCE THE AMOUNT OF WASTE PRODUCED.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p> <ul style="list-style-type: none"> <li>• Will it lead to reduced consumption of materials and resources?</li> <li>• Will it reduce waste through recovery and recycling?</li> <li>• Will proposal affect waste disposal and recycling?</li> </ul> <p><b>Indicators</b></p> <ul style="list-style-type: none"> <li>• Kg of Household waste collected per head</li> <li>• % of waste recycled</li> <li>• % waste treated</li> <li>• % of waste landfilled</li> <li>• Total waste arisings by type</li> <li>• Number of Planning Applications for waste management facilities;</li> <li>• Annual Assessment of Capacity of waste management facilities.</li> <li>• Number of Non Waste Planning Permissions at safeguarded sites.</li> </ul> <p><b>Targets</b></p> <ul style="list-style-type: none"> <li>• Match the National Waste Strategy Recycling and composting targets of 50% by 2020;</li> <li>• Aim to meet Calderdale's proposed aspirational recycling rate of 60% for household waste;</li> <li>• Recovering Value from Municipal Waste - 75% by 2020.</li> <li>• Reducing Biodegradable Municipal Waste landfilled to 35% of that in 1995 by 2020.</li> <li>• Continual reduction in waste disposed of in Landfill;</li> <li>• Reduced levels of exported waste;</li> <li>• Calderdale local target for recycling and composting of Municipal Waste is 50% by 2020.</li> </ul>
<p><b>15. TO PROVIDE GOOD EMPLOYMENT OPPORTUNITIES FOR ALL.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p> <ul style="list-style-type: none"> <li>• Will proposal affect access to employment opportunities?</li> <li>• Will it offer employment opportunities to disadvantaged groups?</li> <li>• Will it help to reduce commuting out of the district?</li> </ul> <p><b>Indicators</b></p> <ul style="list-style-type: none"> <li>• Claimant count based rate of unemployment</li> </ul>

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	<ul style="list-style-type: none"> <li>• % of working age population who are economically active</li> <li>• Unemployment levels as % of people of working age</li> <li>• % of jobs by type (M = manufacturing, S = service, C = construction)</li> <li>• % of working age people claiming out of work benefits in the worst performing neighbourhoods</li> <li>• Job density (Number of jobs per head of working population, e.g. a job density of '1' would mean there is one job per person)</li> <li>• Average Gross weekly pay (all workers living in Calderdale)</li> <li>• GVA per employee;</li> </ul> <p><b>Targets</b></p> <ul style="list-style-type: none"> <li>• Awaiting updated targets concerning % of working age people claiming out of work benefits in the worst performing neighbourhoods.</li> </ul>
<p><b>16. TO ACHIEVE BUSINESS SUCCESS, SUSTAINABLE ECONOMIC GROWTH, AND CONTINUED INVESTMENT.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>• Will it allow the growth of existing firms?</li> <li>• Will it encourage inward investment?</li> <li>• Will it improve the resilience of businesses and the economy?</li> <li>• Will it improve the energy and carbon efficiency of businesses and the economy?</li> </ul>
	<p><b>Indicators</b></p>
	<ul style="list-style-type: none"> <li>• Proportion of new businesses surviving at least 1 year</li> <li>• New businesses which survive 3 years</li> <li>• Employment Land available (Mixed Use and Employment Allocations)</li> <li>• Total amount of additional employment floor space – by type</li> <li>• Net and gross employment floorspace completions - by type (m<sup>2</sup>)</li> <li>• Business registration rate</li> <li>• Business de registration rate</li> </ul>
	<p><b>Targets</b></p>
	<ul style="list-style-type: none"> <li>• 5 year supply of deliverable employment sites</li> <li>• Increase and maintain the new business registration rate in Calderdale to 10% over the regional average</li> </ul>
<ul style="list-style-type: none"> <li>•</li> </ul>	
<p><b>17. ENHANCE THE VIABILITY AND VITALITY OF THE TOWN CENTRES.</b></p>	<p><b>Decision Making Criteria For Local Plan</b></p>
	<ul style="list-style-type: none"> <li>• Will it attract new retailers and other town centre users to the major centres within Calderdale?</li> <li>• Will it allow current retailers to remain trading in the major centres within Calderdale?</li> </ul>
	<p><b>Indicators</b></p>
	<ul style="list-style-type: none"> <li>• Shopping floor space per sector</li> <li>• Retail vacancy rates in the Town and District Centres</li> <li>• Total amount of new floorspace for 'town centre uses' by location (gross and net);</li> <li>• New Comparison retail floorspace by town centre (gross and net);</li> <li>• New convenience retail floorspace by town centre (gross and net);</li> </ul>

	<ul style="list-style-type: none"> <li>Total amount of new floorspace for 'town centre uses' located outside of centres</li> </ul>
	<b>Targets</b>
	<ul style="list-style-type: none"> <li>Latest forecast need for new floorspace by centre;</li> <li>Review of Retail Needs Assessment every 3 years.</li> </ul>

## 5 Summary of the SA Findings

5.1 The majority of the Main Modifications do not result in changes to the impacts on the SA that were identified in earlier versions of the SA. A full list of the SA of the Main Modifications is presented in Appendix 4.

5.2 Where there are changes to the SA, the reports are set out in Appendix 4 (Section C).

5.3 There are new policies that were introduced through the Main Modifications, and these are also shown in Appendix 4 – the policies are as follows:

- WA5 Existing Waste Management Facilities
- IM10 Developer Contributions
- SD6a Regeneration Action Areas

5.4 A further, minor amendment is presented in Appendix 4c, which is the SA site report of LP1000, which had an incorrect address attached to the SA Report in the 2018 SA Report.

## 6 Next Steps

7.1 The proposed Main Modifications to the Local Plan and the SA of the Main Modifications will be subject to a public consultation. Representations received will then be collated and sent to the Inspector following the end of the consultation period.

## 7 Appendices

Appendix 1 – List of SA Documents

Appendix 2 – Audit Trail of SA and Local Plan Policies

Appendix 3 - Housing Need Update – SA Conclusions

Appendix 4 - SA of Main Modifications

Section A - SA of Local Plan Policies Main Modifications SD01.1 and CC39

Section B – SA of Local Plan Site Allocations Main Modifications SD01.2 and CC39

Section C –Updated SA Reports

