

Breckland Local Plan Sustainability Appraisal of Main Modifications

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Quality Management

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Contents

- 1. Non-Technical Summary..... 4
 - Introduction 4
 - Carrying out the SA 6
 - Outcomes 7
- 2. Introduction and SA Approach 8
- 3. Assessing the Local Plan Main Modifications - November 2018 10
 - Appraisal of Vision, Strategic Objectives and Policies..... 10
 - Appraisal of Allocations 28
- 4. Cumulative Effects 30
- 5. Conclusion..... 34
- 6. Next Steps..... 35

1. Non-Technical Summary

- 1.1 The following non-technical summary informs consultees and the general public about the process of Sustainability Appraisal in plain English, avoiding the use of technical terms. The production of a non-technical summary is a requirement of the European Union (EU) Strategic Environmental Assessment Directive known as the “SEA Directive”.

Introduction

- 1.2 Breckland District Council (the Council), has prepared a planning document that will provide a long-term planning vision for the area and will contain policies and guidance that will be used to guide development in the area until 2036. This planning document will be known as the Local Plan.
- 1.3 Preparing a Local Plan involves several stages:
- During 2013, the Council invited interested parties to submit potential sites that could be used for future development.
 - Between November 2014 and January 2015, comments were invited on potential issues to be addressed by the Local Plan and potential options the Local Plan could adopt in seeking to meet the needs of the District. This consultation also included a further call for sites. This consultation was known as the Issues and Options Consultation.
 - Between January and February 2016, comments were invited on the Council's preferred directions and options on a range of strategic topics and emerging development site options. This consultation was known as the Preferred Directions Consultation.
 - Between September and October 2016, comments were invited on the proposed development hierarchy, preferred sites, Snetterton employment area and the approach to rural areas including alterations

to settlement boundaries. The consultation also provided an updated position on the emerging preferred and alternative sites. This consultation was known as the Preferred Site Options and Settlement Boundaries Consultation.

- Between August and October 2017, comments were invited on the Pre-submission Publication Version of the Local Plan.

1.4 In November 2017, the Local Plan was submitted to the Secretary of State so that it could be considered by an independent Planning Inspector. The Planning Inspector held an Examination in Public (EiP) between April and September 2018 where the Local Plan's "soundness" could be publically considered. Soundness of a Local Plan requires:

- legal compliance with relevant laws,
- that its policies are justified and will be effective, and
- conformity with national planning policy.

1.5 A number of proposed Main Modifications to the Local Plan have emerged; that is, proposed changes to text or policy that would make the Local Plan sound. The proposed Main Modifications, as with previous draft versions of the Local Plan, must be consulted upon following Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). SEA and SA assess plans and programmes for their potential environmental, social and economic impact, and their overall sustainability. These assessments are a requirement of European and UK law. SEA and SA can be satisfied through a single process and therefore, SA, incorporating the requirements of SEA, has been carried out by Capita for the Council on the Local Plan proposed Main Modifications. This Report outlines how the SA was carried out and its outcomes.

- 1.6 This SA Report should be read as an addendum to the Sustainability Appraisal August 2017¹ submitted to the Secretary of State alongside the Local Plan in November 2017.
- 1.7 Public consultation on the proposed Main Modifications is likely to commence in early 2019. This addendum is prepared to ensure that when published, the potential significant effects of the proposed Main Modifications have been identified and assessed in accordance with meeting the requirements for SA/SEA.
- 1.8 Following engagement on the proposed Main Modifications, the Local Plan is expected to be adopted.

Carrying out the SA

- 1.9 The SA of the proposed Main Modifications has been carried out using the same methods established by the Council. The assessment uses a simple scoring system and sets out results in a clear matrix format.
- 1.10 The proposed Main Modifications include amendments to most Pre-submission Publication Local Plan policies, the Local Plan Vision and one of the Local Plan Strategic Objectives, and the addition of one new policy.
- 1.11 The assessments take account of:
- the likely positive or negative significance of the effect;
 - how long the effect is likely to last;
 - what areas would be affected;
 - whether the effect would be permanent or temporary; and
 - measures that could overcome any negative effects.

¹ Sustainability Appraisal of the Breckland Local Plan Pre-submission Version, Breckland District Council https://breckland.gov.uk/media/7398/LP-S-3-Sustainability-Appraisal-Pre-Submission/pdf/LP_S_3_Sustainability_Appraisal_Pre-Submission.pdf

Outcomes

- 1.12 Generally speaking, the SA has assessed that the proposed Main Modifications would individually and cumulatively be unlikely to give rise to significant effects beyond those already previously assessed. Inevitably, growth has the potential for adverse environmental impacts. Growth in out-of-settlement locations can generally have greater potential for environmental impacts than within settlements, including loss of greenfield land, impact upon biodiversity, impact upon landscape character and increased use of private vehicle.
- 1.13 The proposed Main Modifications could have effects upon these aspects of sustainability but overall the scale and nature of the effects are unlikely to be significantly different to those previously assessed through SA. Additionally, the Local Plan contains a wide range of policies that would aim to avoid and/or mitigate environmental impacts. The proposed Main Modifications are considered effective in further strengthening the effectiveness of these policies.

2. Introduction and SA Approach

- 2.1 This Report relates to the SA of the proposed Main Modifications to the Breckland Pre-submission Publication Local Plan². This Report should be read as an addendum to the Pre-submission Publication Sustainability Appraisal, August 2017³.
- 2.2 To ensure that consideration of the potential implications of all proposed Main Modifications has been undertaken, this SA has incorporated a two stage process.
- 2.3 Outlined at Appendix B, an initial assessment has been undertaken of every proposed Main Modification both in relation to changes to the supporting text and to the vision, strategic objectives, policies and allocations. This initial assessment considers whether the modification is likely to have implications for the significant effects of the Local Plan upon the SA objectives. This assessment was made by reading the proposed Main Modification and making and documenting a reasoned judgement on its potential for significant effect.
- 2.4 This is followed by an appraisal of each of those proposed Main Modifications identified as requiring further consideration. Using the SA Framework established by the Council, the significant effects of these proposed Main Modifications have been assessed in Appendix C (vision, strategic objectives and policies) and Appendix D (allocations). Appendices C and D effectively update the existing SA assessments of each part of the Local Plan subject to

² Breckland Local Plan Pre-submission Version, Breckland District Council
https://www.breckland.gov.uk/media/7661/LP-S-1-Local-Plan-Regulation-19-Pre-submission-Publication-Part1/pdf/LP_S_1_Local_Plan_Regulation_19_Pre-submission_Publication_Part1.pdf
https://www.breckland.gov.uk/media/7662/LP-S-1-Local-Plan-Regulation-19-Pre-submission-Publication-Part2/pdf/LP_S_1_Local_Plan_Regulation_19_Pre-submission_Publication_Part2.pdf

³ Sustainability Appraisal of the Breckland Local Plan Pre-submission Version, Breckland District Council https://breckland.gov.uk/media/7398/LP-S-3-Sustainability-Appraisal-Pre-Submission/pdf/LP_S_3_Sustainability_Appraisal_Pre-Submission.pdf

change as a result of the proposed Main Modifications. A new policy is proposed as part of the proposed Main Modifications and for this, a new assessment has been undertaken.

- 2.5 The SA of the proposed Main Modifications has been carried out using the same methods established by the Council and employed in the Pre-submission Publication Sustainability Appraisal of August 2017. Readers are directed to that document for a full explanation of how the methods were established and employed.

- 2.6 Assessments are set out in matrix format. The assessment of Local Plan Strategic Objectives uses a simpler version of the matrix than the assessments for Local Plan policies and allocations. A scoring system and assessment criteria is used to ensure transparency and consistency across the assessments. These can be found in Appendix A.

3. Assessing the Local Plan Main Modifications - November 2018

- 3.1 The initial assessment of all proposed Main Modifications is provided at Appendix B. The purpose of the assessment was to transparently set out that the potential sustainability impacts of all proposed Main Modifications had been considered. The outcomes of this assessment is that only the proposed Main Modifications to the Local Plan vision, strategic objectives, policies and site allocations would have the potential for significant effect requiring further consideration through a full SA assessment. Whilst it is noted that there are some fairly large amendments proposed to supporting text, this text generally only provides further detail on how a policy should be implemented; the significant effect arises from the policies themselves rather than its supplementary information.
- 3.2 Please see the Pre-submission Publication Sustainability Appraisal, August 2017, for further information on how policy and allocations options have evolved.

Appraisal of Vision, Strategic Objectives and Policies

- 3.3 The proposed Main Modifications include amendments to most Pre-submission Publication Local Plan policies and the addition of one new policy. These policies, plus the Local Plan Vision, were reappraised or newly appraised against the established SA Framework. A Main Modification is proposed to one of the Strategic Objectives; as per the established SA Framework, this was reappraised using a simpler approach than the policies and Vision.
- 3.4 The assessments of policies and Vision take account of:
- the likely positive or negative significance of the effect;

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- the duration of the effect in terms of the short-term (0-5 years), medium-term (5-10 years) and long-term (15 years +);
- the geographical scope of the effect;
- whether the effect would be permanent or temporary; and
- potential mitigation.

3.5 The effects of the updated/new policy assessments on SA Objectives are presented below. The detailed SA tables for the policies can be found in Appendix 3. The outcomes of the SA assessments are presented in a clear table that allows for an understanding of their cumulative effects in appendix E.

SA Objective 1: Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling/reuse of onsite resources to minimise the impacts on the environment and safeguard resources for the future generations				
Effect	Loss of greenfield land across the District			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive and Negative Impacts	District Wide	Long term	Permanent	Certain
<p>Assessment: The policies within the plan are likely to have both positive and negative impacts around the loss of undeveloped land. The greatest cause of loss of undeveloped land within the Local Plan is due to the housing and employment requirements. The housing target has been defined within the Central Norfolk Strategic Housing Market Area and is based around the need to meet the District's full objectively assessed housing need as required within through the National Planning Policy Framework. There is limited brownfield land availability within Breckland, and as such the delivery of housing and employment sites will require the loss of greenfield land. Policies do require the use of brownfield land first where it is appropriate to do so. Furthermore a number of the environmental policies also score positively against the SA objective, where they seek to protect key environmental</p>				

characteristics.

Mitigation Proposal: The loss of greenfield land to development across the District will be mitigated through the controlled release of land for development to ensure that the best use of brownfield land is made and, where development takes place to ensure the most efficient use of available land. Releases will also be made in line with identified development needs to ensure that excessive land is not allocated resulting in loss of undeveloped land.

Effect of proposed Main Modifications: The proposed main modifications to policies HOU 03 HOU 04 and HOU 05 could allow for some further greenfield development but it is likely to be a relatively small amount and would not have a significant effect. The modification to HOU 01 does not increase the overall housing requirement but in removing the previous stepped housing requirement may bring forward the potential negative effects of development upon this Objective, but the modification does not amend the volume of development and therefore has no overall effect over the Plan period. Whilst HOU 02 identifies an increase in housing delivery in each settlement this has come about through the inclusion of existing committed sites to the supply accounted for and does not represent an increase in delivery in each settlement.

The introduction of policy INF 03 that requires review of certain policies of the Plan to commence by 31st May 2019 or within 3 months of the adoption (whichever is soonest) would be a useful tool in ensuring that the housing need figure is accurate and that housing would only be delivered in accordance with local need.

SA Objective 2: Limit water consumption to the capacity of natural processes and storage systems and maintain and enhance water quality

Effect	Water conservation methods are encouraged, resulting in more limited consumption			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive and negative impacts	District Wide	Long term	Permanent	Uncertain

Assessment: New development (both residential and economic) will have a requirement

for increased water resources. The baseline information shows that Breckland is one of the driest Districts in England and that the aquifer that underlies the District serves other areas as well as the District itself. However, the Water Cycle Study indicates that there is sufficient capacity to accommodate the planned level of growth.

Mitigation Proposal: General support is given to the principles of water conservation through policies within the Local Plan, including application of Optional Technical Standards for Water Efficiency.

Effect of proposed Main Modifications: The proposed Main Modifications would have some positive effects against this SA Objectives (for example, the additional of a new Strategic Objective on climate change and the strengthening of policy ENV09 *Flood Risk & Surface Water Drainage*) but the outcome is not considered to have a significant effect beyond that previously assessed. The proposed Main Modification to HOU 05 increases the potential for further development in villages without a settlement boundary and due to a number of recent permissions, more housing will also be located in Dereham and Watton over the plan period, which are water sensitive areas. It is considered that in applying the other policies within the Plan, the effect of this would not be significant.

SA Objective 3: Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality

Effect	Sustainable reuse of water limiting consumption			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	District wide	Long term	Permanent	Uncertain

Assessment: This sustainability objective has been included following comments from the Environment Agency. The policies within the document have been informed by the Water Cycle Study, and the findings in the updated Water Cycle Study and Strategic Flood Risk Assessment have informed amendments to policies.

Mitigation Proposal: See mitigation comments for SA Objective 2.

Effect of proposed Main Modifications: See comments for SA Objective 2.

SA Objective 4: Minimise the production of waste and support the recycling of waste				
Effect	Landfill capacity exhausted through increased development			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Negative	District wide	Long term	Permanent	Uncertain
<p>Assessment: New development will lead to an increased amount of waste, which will need to be dealt within the County. Norfolk County Council are the Minerals and Waste Authority for Norfolk and have produced a Minerals and Waste Core Strategy and Site Allocations DPDs.</p>				
<p>Mitigation Proposal: There are limited options for mitigating against an increase in waste through the Local Plan. The sustainability appraisal for the site allocations includes reference to the proximity of recycling centres to the sites.</p>				
<p>Effect of proposed Main Modifications: The proposed Main Modifications would not give rise to significant effect against this SA Objective.</p>				

SA Objective 5: Reduce contributions to climate change and localised air pollution				
Effect	Increased levels of air pollution			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive and negative impacts	District Wide	Long Term	Permanent	Uncertain
<p>Assessment: Climate change is a significant issue on a number of different scales, it is a global issue affecting worldwide natural processes, national in terms of its wider ranging effects on biodiversity or risk of flooding, whilst also an issue with local that must be addressed through actions at the local level as well as nationally and internationally.</p>				
<p>Mitigation Proposal: The policies around the location of housing, employment and retail sites focus the majority of the development planned for Breckland on the key settlements, market towns and local service centre villages. This approach helps to mitigate against</p>				

increased levels of car use by placing development in areas where there is access to public transport, in this regard the policies score positively against the sustainability objective. The housing policies for the smaller villages and hamlets have a negative impact, as there is unlikely to be public transport facilities available. Only limited numbers of houses are likely to come forward through these policies, therefore the negative impacts are likely to be minimised.

Effect of proposed Main Modifications: There are a number of proposed Main Modifications to the Plan that would be positive with regards to this SA Objective. There is an addition to the Vision and a new Strategic Objective about the need to adapt to and mitigate the impacts of climate change. Policy ENV 10 would be strengthened with regards to new renewable energy and low carbon development and policy COM 02 would be strengthened with regards to localised air pollution.

The proposed Main Modifications to housing policies that would allow for greater flexibility in delivering homes outside of settlement boundaries would not be compatible with this SA Objective, supporting the previous assessment outcomes.

SA Objective 6: To adapt to climate change and avoid, reduce and manage flood risk				
Effect		Reduce risk of flooding to new and existing developments		
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	District wide	Long term	Permanent	Uncertain
<p>Assessment: The evidence base for water and flood risk is included within the Water Cycle Study, Strategic Flood Risk Assessment and sequential test. These documents show that there is enough land available for development within the District without the need to build in area at risk of flooding.</p>				
<p>Mitigation Proposal: The preferred approach within the Local Plan is to provide a specific policy setting out the requirements from planning applications in relation to flood risk. In addition to this, it also requires development to mitigate surface water flooding on-site through the use of Sustainable Drainage Systems.</p>				

Effect of proposed Main Modifications: The addition to the Vision and a new Strategic Objective about the need to adapt to and mitigate the impacts of climate change, set out an overarching positive approach with regards to this SA Objective. Otherwise, no significant effects are envisaged arising from the proposed Main Modifications.

SA Objective 7: Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity

Effect	Number of sites protected for biodiversity and geodiversity. Expansion of habitats of importance to biodiversity.			
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Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive and Negative Effects	District wide	Long term	Permanent	Uncertain

Assessment: Breckland contains a high number of important, European, National and Local sites, which have been protected for their biodiversity or geodiversity importance. The development requirements outlined in HOU 01 and EC 01 are likely to put pressure on undeveloped land for housing and employment development. However, policies ENV02 and ENV 03 are designed to protect these features.

Mitigation Proposal: The approach to the protection and enhancement of biodiversity and geodiversity in the context of the Local Plan has been assessed through the Habitats Regulations Assessment. The approach set out within the Local Plan seeks to protect and enhance designated biodiversity sites. However, there will be loss of undeveloped land which is not subject to a European, national or local designation.

Effect of proposed Main Modifications: There are proposed Main Modifications to housing policies that would allow for some flexibility in delivering homes outside of settlement boundaries. However, the amount of development as a result of these proposed Main Modifications is unlikely to be significantly different to what was previously assessed and thus the effect upon this SA Objective is not expected to be significant. Additionally, the specific sites and their characteristics are unknown at this stage and the Plan requires new development to protect and enhance biodiversity.

The proposed Main Modifications strengthen policy ENV02 and ENV 03's ability to protect, conserve and enhance biodiversity, supporting the previously assessed highly positive outcome.

SA Objective 8: Protect, enhance and increase Green Infrastructure in the District				
Effect	Number of sites which contribute to Green Infrastructure within the District.			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive Impacts	District wide	Long term	Permanent	Uncertain
<p>Assessment: Breckland includes a number of sites which contribute towards biodiversity within the District. The policies have sought to incorporate green infrastructure wherever possible. The green infrastructure policy supports the delivery of green infrastructure through the planning process and attempts to mitigate the loss of these sites.</p>				
<p>Mitigation Proposal: The mitigation approach to green infrastructure is to include a specific policy within the Local Plan to ensure that green infrastructure is fully considered through planning applications, protected from development and enhancement is sought where possible.</p>				
<p>Effect of proposed Main Modifications: The proposed Main Modifications to housing policies that would allow for some flexibility in delivering homes outside of settlement boundaries increases the risk of negative effects against this SA Objective. Meanwhile, some further amendments such as inclusion of green corridors in policy ENV 01 improve the effectiveness of the Plan in safeguarding green infrastructure and reinforce the previously assessed positive effects of the plan</p>				

SA Objective 9: Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character				
Effect	New development provides quality environments that respond to local landscape townscape character			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	District wide	Long term	Permanent	Uncertain
<p>Assessment: Breckland has a diverse landscape and locally distinctive patterns of development. This diversity is an important characteristic of the area and has been assessed through the Landscape Character Assessment and also the Settlement Fringe Study.</p>				
<p>Mitigation Proposal: New development has the potential to create harmful effects upon the landscape and townscape of the District. To mitigate against these potential effects, opportunities to avoid harm or opportunities to enhance landscape and townscape character should be considered through the planning process. The Local Plan includes specific policies such as Design and a number of other policies include reference to landscape and townscape character in the criteria for the assessment of applications.</p>				
<p>Effect of proposed Main Modifications: In general, the proposed Main Modifications have been assessed to have minimal effects upon this SA Objective.</p> <p>The proposed Main Modifications to housing policies would allow for some further flexibility in delivering homes outside of settlement boundaries but would not increase significantly the amount of development that could occur outside the boundaries of settlements. As specific sites are unknown at this stage, the impact of the proposed Main Modifications would not alter the previously assessed outcomes.</p>				

SA Objective 10: Conserve and where appropriate enhance the historic environment				
Effect	The character of the historic environment is conserved and enhanced. Buildings with a historic value are conserved and enhanced.			
Positive/ Negative Impact	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence

upon Baseline		Medium/ Long term)	permanent	
Positive	District wide	Medium to long term	Permanent	Uncertain
<p>Assessment: The district has 50 conservation areas and over 1,500 listed buildings. Both designated and non-designated heritage assets contribute greatly to the character of the District. New development in the form of residential, employment, tourism or infrastructure has the potential to impact upon Breckland's historic environment.</p>				
<p>Mitigation Proposal: The Local Plan includes two specific policies relating to the protection of the historic environment, one of which relating to designated heritage assets, and the other to non-designated heritage assets. The inclusion of localised policies will help to mitigate against proposals coming forward which could harm the historic environment. In addition to this a number of policies also include reference to the need to protect the historic environment, and add to the weight which can be given to the issue through the determination of planning applications.</p>				
<p>Effect of proposed Main Modifications: In the main, the proposed Main Modifications would not alter the previously assessed outcomes. However, the Main Modifications are likely to strengthen the overall effectiveness of the policies with amendments to policies Policy ENV 07 <i>Designated Heritage Assets</i> and ENV 08 <i>Non-Designated Heritage Assets</i> that would bring the Local Plan in line with the NPPF.</p>				

SA Objective 11: Improve the health and well being of the population				
Effect	Growth is located in areas where there is convenient access to healthcare and social facilities.			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	District wide	Medium to long term	Permanent	Uncertain
<p>Assessment: New development has the potential to impact upon the health and well being of the population in a number of different ways. Not only does the increase in population</p>				

have impacts upon the capacity at local surgeries and other local facilities important to health and well-being, the increased available of better quality new housing stock and creation of environments that encourage health and active lifestyles can impact upon health. Such approaches would include incorporating features such as pedestrian and cycle links which can support improved health of residents.

Mitigation Proposal: Central to the Local Plan is ensuring that the population has good access to essential services and facilities. In general this takes the form of directing development to areas that have these services in existence already, but also can include requiring provision to be made for those services in response to new development. The Local Plan includes a policy relating to healthy lifestyles (COM 02) and requiring development to incorporate health and well being into the design of the scheme.

Effect of proposed Main Modifications: In the main, the proposed Main Modifications would not alter the previously assessed outcomes. Positive effects are envisaged with regards to the proposed Main Modification to policy TR 02 *Transport Requirements for Major Developments* that would further strengthen support for pedestrian and cycle paths, and adds emphasis on improving connectivity.

SA Objective 12: Reduce and Prevent Crime				
Effect	Reduction in the fear of crime through design quality			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	Local	Medium term	Permanent	Uncertain
Assessment: Whilst crime rates are not high in Breckland, this is something which is monitored through the baseline survey. The design of new developments can have an important role to play in both reducing crime and reducing the fear of crime within the District.				
Mitigation Proposal: Design quality will be assured through the development management function of the Council, in conjunction with the Police's Architectural Liaison Officer. The inclusion of two specific design policies within the Local Plan will help to achieve this aim. It will also be achieved through an approach to infrastructure that will include				

ensuring that public open space and transport routes are well lit and surveyed.

Effect of proposed Main Modifications: In the main, the proposed Main Modifications would not alter the previously assessed outcomes. Positive effects are envisaged with regards to the proposed main modification to policy TR 02 *Transport Requirements for Major Developments* that would further strengthen support for safe, purpose built pedestrian and cycle paths.

SA Objective 13: Improve the quality and quantity of publicly accessible open space

Effect	Open space is provided and protected in the District through new developments			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	District Wide	Short to Long Term	Permanent	Certain

Assessment: The evidence base for open space is provided through the Open Space Assessment and the parish Schedule. This shows that there is a significant deficit in open space within Breckland in relation to the size of the population. The assessment is based on the Fields In Trusts space standards for children's play areas and outdoor sports facilities.

Mitigation Proposal: The Local Plan includes a specific policy on open space and requires all net new dwellings to contribute towards open space. Sites of 25 dwellings or more will be required to provide on-site open space, whilst those for less than 25 on site provision is preferable but where appropriate a financial contribution would be sought. This will be secured through planning obligations, in accordance with the requirements of the Community Infrastructure Levy regulations. In addition to this the policy also seeks to protect existing open spaces from redevelopment.

Effect of proposed Main Modifications: The proposed Main Modifications would not alter the previously assessed outcomes. Policy ENV04 *Open Space, Sport and Recreation* would be amended so that only new residential development of 11 or more dwellings will be expected to provide a contribution towards open space, rather than all new residential development. The way in which the contribution is calculated would mean that the amount yielded from developments of less than 11 dwellings would not be significant. The Plan in

general and policy ENV04 continue to have an overall positive approach to the protection and improvement of open space provision.

SA Objective 14: Improve the quality, range and accessibility of essential services and facilities

Effect

Levels of service provision in rural settlements are maintain or improved.

Essential services become more accessible.

Healthy and vibrant town centres to serve the needs of the District.

Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	District Wide	Short to Long Term	Temporary	Uncertain

Assessment: Maintaining access to services and facilities is an essential part of creating sustainable development within Breckland. Due to the size of the District and the limited levels of public transport provision, it is important to maintain existing services and facilities and provide appropriate protection of existing provision from re-development pressures. Furthermore, it is also important to direct development to areas where there are good public transport links.

Mitigation Proposal: The Local Plan includes a specific policy on the protection of community facilities. It requires applications for the change of use of these facilities, to demonstrate that the use is no longer viable, this includes through the appropriate marketing of facilities. This approach will be particularly important in the rural areas and local service centre villages. Furthermore, the policies seek to concentrate development in areas with better access to services and facilities.

The Local Plan also supports the role of town centres within Breckland through policies allocating new development in these areas. In addition to this the policy also recommends a lower impact assessment threshold, which should secure the majority of retail developments towards the town centre. This is important not only in maintaining the vitality and viability of the District, but also in directing development to areas where there is public transport accessibility.

Effect of proposed Main Modifications: The proposed Main Modifications would not alter the previously assessed outcomes.

SA Objective 15: Redress inequalities related to age, gender, disability, race, faith, location and income

Effect	<p>Sufficient housing is secured for all in need.</p> <p>Income inequalities are reduced by providing affordable housing.</p> <p>Encouraged diversity of employment.</p> <p>Essential services become more accessible.</p>
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Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	Local/District Wide	Medium to Long Term	Permanent	Uncertain

Assessment: There are a number of inequalities within the District which the Local Plan can seek to address. Inequalities, can include access to housing (both private and affordable) for different groups within the community. It can also include access to essential services and facilities, for instance those on lower incomes are likely to find it harder to access services and facilities in the rural area. The Local Plan includes a range of policies which will help to tackle these issues.

Mitigation Proposal: The housing target for Breckland has been set based on the findings of the Central Norfolk Strategic Housing Market Assessment. This has assessed the housing needs for all groups within Breckland and has been used to set the annual housing target. In addition to this it has also provided the affordable housing requirement.

The Local Plan includes a specific policy on the protection of community facilities. It requires applications for the change of use of these facilities, to demonstrate that the use is no longer viable, this includes through the appropriate marketing of facilities. This approach will be particularly important in the rural areas and local service centre villages, helping to ensure the rural population is served by local facilities.

Effect of proposed Main Modifications: In the main, the proposed Main Modifications would not alter the previously assessed outcomes. The proposed main modification to policy HOU 06 *Principles of New Housing* would have a positive impact on redressing inequalities

through considering the housing needs of Gypsy and Travellers. Policy HOU 10 *Technical Design Standards for New Homes* would no longer have positive benefits with regards to this SA Objective. The introduction of policy INF 03 that requires review of certain policies of the Plan to commence by 31st May 2019 or within 3 months of the adoption (whichever is soonest) would be a useful tool in monitoring and possibility revising policy HOU 10.

SA Objective 16: Ensure all groups have access to affordable, decent and appropriate housing that meets their needs

Effect	Sufficient housing is secured for all in need. Increased stock of affordable homes. Greater provision of affordable housing in rural areas.			
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Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	District Wide	Long Tern	Permanent	Certain

Assessment: The Central Norfolk Housing Market Assessment has assessed the affordable housing requirement within Breckland, based on the level of need of the population within the housing market area. There are a number of policies within the Local Plan which will have a positive impact on affordable housing provision, with all new major developments being expected to provide affordable housing. Some of the environmental policies have the potential to have a negative impact on the achievement of this sustainability objective as they restrict the area where new housing can be developed.

Mitigation Proposal: The policy seeks to secure affordable housing on-site for all major applications. This will help to meet the affordable housing need identified through the Central Norfolk Strategic Housing Market Assessment. In the rural areas, the Local Plan also includes a policy around the delivery of rural affordable housing exception site. These sites have an important role in delivering affordable housing to areas outside of the locational strategy.

Effect of proposed Main Modifications: The proposed Main Modification to policy HOU 02 *Level and Location of Growth* would see the inclusion of an additional housing delivery buffer to reflect housing completions and commitments to March 2018, which illustrates

sufficient homes to meet need. This is supported by the proposed addition of policy INF03 that would require a review of the Local Plan to ensure that housing was being delivered as needed.

The proposed Main modification to policy HOU 10 would remove requirements around accessibility and adaptability, meaning the policy would no longer have the same positive benefits in meeting the housing needs of all. However, the introduction of policy INF03 would be a useful tool in monitoring and possibly revising policy HOU 10.

SA Objective 17: Increase the vitality and viability of existing town centres				
Effect	The vitality and viability of town centres is sustained and enhanced.			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	Local	Medium Term	Permanent	Uncertain
<p>Assessment: The approach to town centres has been informed by the Retail and Town Centre Study 2014 and the addendum, which has included providing new convenience and comparison requirements for the plan period within the District's market towns. In addition to new developments, improving the vitality and viability of the market towns also includes consideration of the aesthetics of the town centre, making it a more attractive area where people want to spend time.</p>				
<p>Mitigation Proposal: Town centre growth is supported through policies within the Local Plan. This will be delivered through the development management process and needs to be coupled with new housing growth in appropriate locations with linkages to the town centre.</p>				
<p>Effect of proposed Main Modifications: The proposed Main Modifications tend to have little to no effect or would support previously assessed positive outcomes. The proposed Main Modifications to policy TR01 <i>Sustainable Transport Network</i> would improve the score by seeking to strengthen the role of sustainable modes of transport, which should increase opportunities for new developments to connect to town centres.</p> <p>It has been identified that the proposed Main Modification to policy EC 03 <i>General Employment Areas</i> would provide further support for mixed use development on employment areas; this could increase the likelihood of retail development and other town centre uses being located outside of town centres, having a negative impact on their vitality</p>				

and viability. The policy has been reassessed as having a very negative effect against this SA Objective.

SA Objective 18: Help people gain access to satisfying work appropriate to their skills, potential and place of residence				
Effect	<p>A better range of employment opportunities.</p> <p>Strong economic growth resulting from diversification of employment opportunities.</p> <p>Housing of an appropriate affordability in terms of size, type and tenure to help enable employment opportunities.</p>			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	District Wide	Long Term	Permanent	Uncertain
<p>Assessment: The policies around employment provision have been informed by the Employment Growth Study 2013. This has assessed the level of employment growth required within the District over the plan period. In addition to this it has also looked at the existing general employment areas within Breckland and consider whether they remain fit for purpose going forward. The document has recommended the need for further employment land within the District over the plan period. It also shows the role the rural areas plays in supporting the economy.</p>				
<p>Mitigation Proposal: The Local Plan aims to secure employment growth through the allocation of general employment land. The policies in the Local Plan seek to protect these sites for B class uses. It does also recognise the need in certain instances for employment development to be located outside of general employment areas, this supports the issues noted within the employment growth study.</p>				
<p>Effect of proposed Main Modifications: The proposed Main Modifications tend to have little to no effect or would support previously assessed positive outcomes. The introduction of policy INF 03 that requires review of certain policies of the Plan to commence by 31st May 2019 or within 3 months of the adoption (whichever is soonest) would be a useful tool in monitoring and possibility revising policies relating to economic development and housing delivery. This would be a positive approach with respect to this SA Objective.</p>				

SA Objective 19: Improve the efficiency, competitiveness and adaptability of the local economy				
Effect	Strong economic growth resulting from diversification of employment opportunities. Sustained employment growth.			
Positive/ Negative Impact upon Baseline	Spatial Extent	Duration (Short/ Medium/ Long term)	Is the effect temporary or permanent	Probability of occurrence
Positive	District Wide	Medium term	Permanent	Uncertain
<p>Assessment: The policies around employment provision have been informed by the Employment Growth Study 2013. This has assessed the level of employment growth required within the District over the plan period. In addition to this it has also looked at the existing general employment areas within Breckland and consider whether they remain fit for purpose going forward.</p>				
<p>Mitigation Proposal: The Local Plan supports the delivery of employment development throughout the District. It seeks to focus the majority of employment development on the market towns, where there are opportunities for people to access employment through means other than car use. Policies in the Local Plan also recognise the role of the rural economy, including tourism and policies support this.</p>				
<p>Effect of proposed Main Modifications: The proposed Main Modifications tend to have little to no effect or would support previously assessed positive outcomes. The introduction of policy INF 03 that requires review of certain policies of the Plan to commence by 31st May 2019 or within 3 months of the adoption (whichever is soonest) would be a useful tool in monitoring and possibility revising policy EC01 <i>Economic Development</i>. This would be a positive approach with respect to this SA Objective.</p>				

Appraisal of Allocations

3.6 The Breckland Pre-submission Publication Local Plan includes a number of housing allocations in Dereham, Swaffham, Watton, Ashill, Banham, Bawdeswell, Garboldisham, Harling, Hockering, Kenninghall, Narborough, Necton, North Elmham, Old Buckenham, Shipdham, Sporle and Swanton Morely. Employment allocations are proposed at Attleborough and Snetterton (along with many sites from the previous development plan that will not be superseded). Several of the allocations proposed in the Pre-submission Publication Local Plan have proposed Main Modifications.

3.7 The full SA assessments for allocations are contained within Appendix D and have been carried out in accordance with the established SA Framework. For allocations, the notable amendments proposed through Main Modifications are:

- Removal of specific open space requirements per allocation; instead open space would be provided in accordance with policy ENV 04. This is considered a more reactive and positive approach to open space provision and this has either improved previous assessments outcomes or supported previous positive assessments.
- The proposed Main Modifications would put much more emphasis upon the conservation of the historic environment when delivering development at the allocations. This has either improved previous assessments outcomes or supported previous positive assessments.
- The Pre-submission Publication Local Plan included the requirement for allocations to have had a pre-application enquiry with Anglian Water Services to demonstrate that sufficient capacity would be available to transfer wastewater for treatment. The proposed Main Modifications would instead require sufficient information on this matter to be submitted at planning application stage. The effect of this proposed Main Modification is not

CAPITA

considered to be significant as it would still ensure that sufficient network capacity existed.

- 3.8 Aside from the positive effects with regards to open space and the historic environment described above, the proposed Main Modifications to the allocations would not result in significant effects.

4. Cumulative Effects

- 4.1 The SEA Directive sets out that an assessment of secondary, cumulative and synergistic effects should be incorporated into the SA. These terms are not mutually exclusive and, in this case, the term ‘cumulative effects’ will include inter, intra, secondary and synergistic effects.
- 4.2 The commentary below focuses on the impacts of the proposed Main Modifications and how they would cumulatively effect the implementation of the Local Plan. Please see the Sustainability Appraisal for the Pre-submission Publication Version Local Plan for further commentary of the overall cumulative effects of implementing the Plan.
- 4.3 The cumulative effects of implementing the policies in the Plan are displayed in Appendix E. A summary is provided below identifying both the originally assessed cumulative effects of the submitted Pre-submission Local Plan and the cumulative effect taking into consideration the Main Modifications.

SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
Cumulative effect	Pre-sub	-	+/-	0	0	+/-	+	+	+	+	+	+	+	++	++	++	++	++	++	++
	Main Mods	-	+/-	0	0	+/-	+	+	+	+	+	+	+	++	++	++	++	++	++	++

- 4.4 As the above table shows, when combined, the majority of policies have an overall positive cumulative effect. In this context, economic, social and employment related policies mostly complement each other, reinforcing that the local community is essential component in achieving sustainable development. Furthermore, these policies are supported by the overall approach to transport, which aims to improve local access through

sustainable uses of transport helping to support growth by improving access to local amenities and employment areas. The Plan's transport policies would be strengthened by the proposed Main Modifications.

- 4.5 The cumulative assessment also reveals that biodiversity, cultural heritage, landscape and population, and human health would continue to achieve an overall positive cumulative (+) score when incorporating the proposed Main Modifications.
- 4.6 Overall the proposed Main Modifications have a positive effect upon delivery of the District's housing needs, and supporting the wider range of indirect effects upon social and economic objectives that access and provision of housing has, supporting the previous highly positive cumulative score against SA Objective 16. The proposed Main Modification to policy HOU 02 *Level and Location of Growth* does not allocate additional housing sites or increased numbers but through the update to housing completions and commitments and the addition of such delivery in villages without settlement boundaries, the modifications highlight an 8.7% buffer above the District's assessed housing need. The proposed Main Modifications to policies HOU 03, HOU 04 and HOU 05 would allow for some further flexibility in allowing housing development of an appropriate scale outside of settlement boundaries. This would be further supported by the introduction of policy INF 03 that requires review of certain policies of the Plan to commence by 31st May 2019 or within three months of the adoption (whichever is soonest), which would be a useful tool in ensuring that the housing need figure is accurate and that housing is being delivered in accordance with local need.
- 4.7 The proposed Main Modifications to policies HOU 03, HOU 04 and HOU 05 would allow for some further flexibility in permitting housing development of an appropriate scale outside of settlement boundaries. Land outside of settlement boundaries tends to be greenfield and development at such sites

would see the permanent loss of greenfield land. For this reason, the previously assessed negative cumulative score against SA Objective 1 would remain. Given that the specific sites and their characteristics are unknown at this stage, it is not possible at this stage to ascertain what impact there would be upon green infrastructure, biodiversity and landscape. In accordance with the Local Plan, development should not have unacceptable impacts upon biodiversity and landscape, and this position has been strengthened with proposed Main Modifications to respective policies. On this basis, the Plan should work well together to ensure that new development in out-of-settlement locations should not be harmful to biodiversity and landscape.

- 4.8 The proposed Main Modifications that allow for some further flexibility in the delivery of homes of appropriate scale outside of settlement boundaries, could represent a potential for increased air pollution if not appropriately mitigated. Out-of-settlement locations tend to be less well-served by facilities, services and public transport and residents may therefore rely more heavily upon private vehicles to meet their daily needs. The proposed Main Modifications to these policies ensure that the out-of-settlement growth should not be significant. Cumulatively, the effect on localised air pollution from these proposed Main Modifications could be negative but unlikely to be significant. There are a number of positive proposed Main Modifications across the Plan that relate to air pollution and the Council must implement the relevant Plan policies alongside new development to successfully mitigate negative effects. Given the addition of these positive proposed Main Modifications in respect of air pollution, the overall cumulative effect is not envisaged to change.
- 4.9 It has been identified that the proposed Main Modifications to the Local Plan would together see it having a much more robust approach to conserving the historic environment. This arises from the proposed Main Modifications to policies ENV 07 *Designated Heritage Assets* and ENV 08 *Non-Designated*

CAPITA

Heritage Assets, which would bring them in line with national guidance set out in the NPPF, and the proposed Main modifications to allocations that would put much more emphasis upon the conservation of the historic environment when delivering development at the allocations. This has either improved previous assessments outcomes or supported previous positive assessments. Whilst measures to conserve the historic environment could be perceived as a constraint to growth, its conservation has broad-reaching environmental, social and economic benefits. The more robust approach put forward through the proposed Main Modifications further strengthens the previously assessed highly positive cumulative score.

5. Conclusion

- 5.1 This report, and associated appendices, is the result of a detailed assessment of the proposed Main Modifications of the Breckland Pre-submission Publication Local Plan against the 19 sustainability objectives developed through the SA process. This report is an addendum to the Sustainability Appraisal August 2017.
- 5.2 The proposed Main Modifications include amendments to most Local Plan policies and the addition of a new policy. There are proposed Main Modifications relating to housing delivery and the distribution of housing. Proposed new policy INF 03 would allow for monitoring and revision of the Plan's housing strategy if necessary. On this basis, the proposed Main Modifications are a positive step in ensuring the requirement of providing the objectively assessed housing needs of the area is met.
- 5.3 Inevitably, growth has the potential for adverse environmental impacts. Development in out-of-settlement locations generally has greater potential adverse effects, including loss of greenfield land, impact upon biodiversity, impact upon landscape character and increased use of private vehicles. The proposed Main Modifications could have effects upon these aspects of sustainability but overall the scale and nature of the effects are unlikely to be significantly different to those previously assessed through SA. Additionally, the Local Plan contains a wide range of policies that would aim to avoid and/or mitigate environmental impacts. The proposed Main Modifications are considered effective in further strengthening the effectiveness of these policies.

6. Next Steps

- 6.1 The Local Plan examination hearings took place between April and June 2018 with additional hearings in September before an independent Planning Inspector. This SA Report Addendum, with the Local Plan Main Modifications November 2018 will be submitted to the independent Planning Inspector and subject to a formal six week consultation. Following the close of this consultation, all responses will be logged and analysed.
- 6.2 Representations to the proposed Main Modifications consultation will be forwarded to the Planning Inspector to consider. Pending the nature of those responses, the Planning Inspector is expected to prepare and finalise a report into the soundness of the Breckland Local Plan. It is expected that the Local Plan would then be considered by the Local Authority for adoption.
- 6.3 At any point, should the Local Plan be subject to any material changes, it will again be subject to the SA process.