

# Draft Sustainability Appraisal 2012



# **Executive Summary**

## **Methodology**

1. The Strategic Environmental Assessment Directive requires that land use or spatial plans must undergo a Strategic Environmental Assessment. The Planning and Compulsory Purchase Act 2004 has broadened the scope to require a Sustainability Appraisal (SA) for all Spatial Plans, so all parts of the Local Development Framework (LDF) will need to be subject to SA, including Supplementary Planning Documents (SPD).

### **Stage A**

The first stage is to prepare a Scoping Report. This identifies plans, programmes and objectives that may influence the SA and key sustainability issues. From this, sustainability objectives can be developed to enable the policies to be appraised.

### **Stage B**

The objectives of the Plan should be tested against the sustainability objectives to ensure that they are broadly compatible. Changes will be made where necessary to bring these closer into alignment. Any options considered are tested to see how they perform against the sustainability objectives and how they could be amended to better meet the objective. The final policies or combination of policies is then appraised to predict the effects, mitigation is suggested, and measures for monitoring the affects of the policies impacts are set out.

### **Stage C**

Once all the different elements of Stage B have been concluded, this will be brought together in the SA report.

### **Stage D**

Consultation will then take place on the SA report, alongside the Plan. If changes are made to the Plan through the consultation, the appraisal will have to be carried out on those changes as they are developed and the SA report amended.

### **Stage E**

The final stage is to set into place the mechanisms for monitoring, identified under task B6, and to keep the Plan and its impacts under review.

## Scoping

2. The Scoping Report has drawn up a number of Sustainability Issues and also 13 Sustainability Objectives which are:

1. Protect and enhance the quality and distinctiveness of the areas' biodiversity (native plants and animals) and geodiversity.
2. Protect and enhance the quality and distinctiveness of the areas' landscapes, townscapes and historic environment.
3. Protect natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses and pollution.
4. Avoid the risk of flooding (where possible) and fully mitigate against the impact of unavoidable losses and pollution.
5. Promote viable and diverse economic growth that supports communities within the district.
6. Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites.
7. Improve accessibility to key services , facilities, amenities and green infrastructure including the promotion of sustainable modes of access.
8. Increase reuse and recycling rates and minimise the production of waste.
9. Support inclusive, safe and vibrant communities.
10. Ensure that local housing needs are met.
11. Increase energy efficiency and ensure appropriate sustainable design, construction and operation of new development.
12. Encourage and provide the facilities and infrastructure for healthy lifestyles.
13. Positively plan for, and minimise the effects of, climate change.

## Objectives

3. The impact of the broad vision statement on the objectives is broadly neutral or positive; which is to be expected given the strategic and positive nature of the vision statement. The exceptions to this are set out below.

The issues emerging as potential conflict without mitigation are:

Action	Relevant Objective	Recommendation
Encourage and enable rural and farm diversification schemes	2. Protect and enhance the quality and distinctiveness of the area's landscapes, townscapes and historic environment	The ensuing policy includes reference to the environmental capacity of a site. So mitigation is already included.
Encourage and enable rural and farm diversification schemes	6. Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield	The policy text could be strengthened by reference the balance to be struck between the needs of rural communities and the need to protect greenfield land, particularly high quality

	sites.	agricultural land, and the approach taken by the plan.
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The only negative impact emerging from the appraisal is:

<b>Action</b>	<b>Relevant Objective</b>	<b>Recommendation</b>
Cater for the accommodation needs of gypsies and travellers	11. Increase energy efficiency and ensure appropriate sustainable design, construction and operation of new developments	It is unlikely that mitigation can be put in place to address this conflict.

## Options

4. The first version of the Core Strategy was the 2007 Issues and Options document. Option testing from this document was subject to public consultation. There is therefore no need to undertake further options testing for many of the issues covered in the Plan. Uncertainties over the preparation of the East Midlands Regional Plan (see main report) led to some delay in preparing the draft Core Strategy and led to a no growth Core Strategy being prepared in 2009. This document was also subject to SA testing. It is now possible to explore the options for growth and these are being tested through this SA.

### **OPTION 1: CONCENTRATE GROWTH INTO THE FIVE INLAND TOWNS.**

There is likely to be a significant negative impact on local landscapes and significant loss of greenfield land as a result of large urban extensions to the towns. There are positive benefits to the towns in terms of access to services and facilities, and access to healthy lifestyles, but this could lead to a negative impact on other settlements as facilities would tend to be concentrated in the towns. The option could also lead to a shortage of housing in the other settlements, especially affordable housing, and if facilities contract in the other settlements it could lead to an increase in vehicle journeys as those in the rural parts of the district access the services and facilities in the towns. There are potential positive benefits for the ability to respond to climate change issues. There are also uncertainties in respect of biodiversity and impact on natural resources as the volume and location of development is not yet known in respect of each town.

**OPTION 2: MODERATELY DISPERSED DISTRIBUTION OF GROWTH.** There are likely to be negative impacts on local landscapes, although the degree of impact may be less than option 1 as urban extensions may not need to be as large, this will also lead to significant loss of greenfield land. There are positive benefits to the towns in terms of access to services and facilities but this could also lead to a negative impact on other settlements as facilities would still tend to be concentrated in the towns. The option could also lead to a shortage of housing in the medium and small settlements, especially affordable housing, and if facilities contract in these settlements it could lead to an increase in vehicle journeys as those in the rural parts of the district access services and facilities in the towns. Ultimately, there could be an increase in house prices in the more rural parts of the District, pushing up the affordability gap between houses prices and wages. There are potential positive benefits for access to healthy lifestyles and the ability to respond to climate change issues. There are uncertainties in respect of biodiversity and impact on natural resources as the level and location of development is not yet known for each settlement.

**OPTION 3: MORE DISPERSED PATTERN OF GROWTH.** There are likely to be negative impacts on local landscape, although the degree of impact may be less than previous options as this is balanced by the opportunities to assimilate smaller sites into the landscape. Another potential negative impact is development of greenfield land, which is likely in rural settlements. There are positive benefits in terms of access to services and facilities which would be supported in smaller communities. There are also greater opportunities to ensure local housing need is met. There are fewer opportunities for the effects of climate

change to be mitigated with this option. The same uncertainties in respect of biodiversity and impact on natural resources exist until site selection takes place.

**OPTION 4: DISPERSED PATTERN OF GROWTH INCLUDING THE SMALL RURAL VILLAGES.** There are likely to be negative impacts on local landscape. Although the degree of impact may be reduced, as there may be greater opportunity to assimilate smaller sites into the landscape, the impact will be spread across a higher number of settlements. This dispersal of development could also undermine the ability of development to support key infrastructure, services and facilities. The option could also increase the number of vehicle movements across the District as an increased number of people in the small villages access services and facilities in the larger settlement not available to them. There is likely to be significant use of greenfield land and there are fewer opportunities for the effects of climate change to be mitigated with this option. However, there are greater opportunities to ensure local housing need is met and the option could bring support for inclusive and vibrant communities to more places. The same uncertainties in respect of biodiversity and impact on natural resources exist until site selection takes place, although with more rural sites, there may be greater impact on biodiversity.

## Appraisal of Policy

5. The SA has looked at each of the 18 policies against the sustainability objectives. The main body of the report describes the conclusions for each of the policies, below are tables identifying the main areas of tension, along with suggested actions.

<b>Policy</b>	<b>SA Objective</b>	<b>Suggested Action</b>
Strategic Policy 5 - Design	<p>3. Protect natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses and pollution.</p> <p>6. Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites.</p>	<p>The majority of the key natural resources are mentioned in the text to the policy however, the policy would be strengthened with the inclusion of a criterion referring to protection of natural resources. This includes the prioritisation of brownfield land. However, there is no reference in the text to the need to protect the best and most versatile agricultural land. This is an important issue in East Lindsey and should be addressed by a criterion in the policy.</p> <p>Alternatively, these matters could be brought together in a discrete policy on natural resources, as agricultural land is also an important natural resource.</p>
Strategic Policy 6 – Gypsies, Travellers and Showpeople	9. Support inclusive, safe and vibrant communities.	<p>An anomaly has also been identified between this policy and the Coastal Policy in terms of the period of occupation allowed for gypsy and traveller accommodation differs from that for other caravans on the coast and this could be viewed as discriminatory.</p>
Strategic Policy 9 – Inland Tourism	2. Protect and enhance the quality and distinctiveness of the area’s landscapes, townscapes and historic environment.	<p>The Inland Tourism policy has spatial criteria for some elements but not others. New tourist attractions and conservation of buildings do not have any locational element and so could be located in the open countryside with potential landscape impact. The text</p>

		<p>to the policy does reinforce the character of the area and there is reference to conversion of buildings being capable of integration into their surroundings.</p> <p>Additionally, the inland tourism policy seeks to promote the Lincolnshire Wolds for tourism development. The Wolds landscape was designated for its landscape importance, unlike the National Parks which have a recreational element to them.</p> <p>In both cases, the inland tourism policy should be used in association with Strategic Policy 14 – Landscape, which accords the Lincolnshire Wolds AONB the highest level of protection. The combination of this policy and the references in the tourism policy should protect the Wolds landscape, but this should be monitored to ensure the correct balance is being struck. Similarly, the impact of new tourism development and conversion of buildings should be monitored to assess the success of the policies in balancing economic benefits of tourism with the need to protect the landscapes of the District.</p>
	<p>7. Improve accessibility to key services, facilities amenities and green infrastructure including the promotion of sustainable modes of access.</p>	<p>Some elements of the policy, economic development, coastal country park and change of use of buildings to holiday accommodation do not have a spatial element. These parts of the policy are therefore not seeking to improve access to</p>



		<p>services and facilities, or promoting sustainable modes of access in that they, in principle, look positively on development in isolated locations. Although the policy will be used in connection with the transport policy to help offset this, it is not clear why some parts of the policy are spatially specific and others are not. Either the policy should be reworded to address this, or the text of the policy should be supplemented to explain how these non-spatial elements of policy will be judged.</p>
<p>Strategic Policy 11 – Coastal East Lindsey</p>	<p>4. Avoid the risk of flooding (where possible) and fully mitigate against the impacts of flooding where it cannot be avoided.</p> <p>7. Improve accessibility to key services, facilities amenities and green infrastructure including the promotion of sustainable modes of access.</p>	<p>The policy is seeking to achieve the best balance between supporting existing communities in the coastal area and recognising the flood risk issues that exist. A number of mitigation measures are in place in the policy including the use of occupancy conditions to restrict the use holiday chalets and caravans at the most high risk times of the year. However, this occupancy condition has not been extended to the change of use of buildings to holiday lets, or for new hotel and bed and breakfast facilities and this difference in approach should be explained in the text.</p> <p>Some elements of the policy, economic development, coastal country park and change of use of buildings to holiday accommodation do not have a spatial. These parts of the policy are therefore not improving access to services and facilities or promoting sustainable modes of access in that</p>

		<p>they, in principle, look positively on development in isolated locations. Although the policy will be used in connection with the transport policy to help offset this, it is not clear why some parts of the policy are spatially specific and others are not. Either the policy should be reworded to address this, or the text of the policy should be supplemented to explain how these non-spatial elements of policy will be judged.</p>
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6. As the plan progresses through the consultation phases, amendments will be needed to policies and further appraisal will be needed at each stage to show how the plan has taken account of the impacts on the objectives.

**Monitoring**

7. The final stage is to carry out monitoring, and to keep the policy and its impacts under review. Indicators have been identified for four of the sustainability objectives. The indicators have been selected to be manageable and where there are clear linkages between the sustainability objective and the SPD. Indicators have not been provided for all objectives as, in some cases, housing policy does not impact so directly that an attributable link can be made.

# **Background and Methodology**

## **Background**

1.1 The European Directive 2001/42/EC, known as the Strategic Environmental Assessment or SEA Directive, requires that certain plans and programmes must undergo an SEA. This includes land use or spatial plans. The Planning and Compulsory Purchase Act 2004 has broadened the scope of this to require a Sustainability Appraisal (SA) for all Spatial Plans.

## **Sustainability Appraisal**

1.2 The purpose of Sustainability Appraisal is to promote sustainable development through the integration of social, economic and environmental considerations in the preparation of planning policy document. The process will assess how the objectives of the policy meet and contribute towards the sustainability objectives for East Lindsey, how the criteria and guidance in the policy will help deliver sustainability objectives and, where there are any conflicts, what mitigation can be introduced to minimise the impacts.

## **Strategic Environmental Assessment (SEA)**

1.3 The purpose of SEA is to consider the likely significant effects of the Plan on the environment, including issues such as population, human health, biodiversity, soil, fauna, flora, water, air, climate, cultural heritage and landscape. The Environmental Assessment of Plans and Programmes Regulations 2004 provides greater detail on what is required in respect of SEA of plans and programmes and the "Practical Guide to the Strategic Environmental Assessment Directive" published by the Office of the Deputy Prime Minister in 2005 also provides more guidance.

1.4 The requirements of SEA, in terms of the stages that need to be addressed, are similar to the SA stages; more detail is given in the Methodology section. It is now standard practice for the requirements of SEA to be incorporated into the SA.

## **Habitats Regulations Assessment**

1.5 Another requirement of the appraisal of planning documents is to carry out a Habitats Regulations Assessment (HRA) to protect the integrity of sites protected, at a European level, for their value for nature conservation. The Habitats Regulations 1994, as amended in 2006, require that all land use plans are subject to an assessment. There are four main stages to HRA. The first is to consider the likely impacts of the plan or programme on these important sites (screening). If there are any significant effects, the second stage is to carry out an appropriate assessment; this involves fine tuning the plan to ensure any adverse effects are avoided. If there is still an adverse effect, stage three will consider alternative approaches (or sites in the case of site specific documents). The final stage will only happen when no alternative solutions remain but there is still an adverse impact. In this case it has to be demonstrated that there are no "Imperative Reasons of Overriding Public Interest" (IROPI test) that should

require the plan to go ahead. This is a very stringent test that is difficult to pass and stage four should only be reached in limited and extreme cases.

1.6 Due to the specialist knowledge needed to undertake this assessment, stage one of the process is being carried out for the Council by Royal Haskoning, who bring necessary expertise to the process. According to the legislation, it is for the Council to determine, based on the evidence before it, that the Plan has passed the appropriate assessment (stage two).

### Undertaking a Sustainability Appraisal

1.8 Greater detail on each of the stages of the SA is set out below:

Table 1 Stage of Sustainability Appraisal Preparation

SA Stage A	
Stage A1	Identifying other relevant policies, plans and programmes, and sustainable development objectives
Stage A2	Collecting baseline information
Stage A3	Identifying sustainability issues and problems
Stage A4	Developing the SA framework
Stage A5	Consulting on the scope of the SA
SA Stage B	
Stage B1	Testing the Plan's objectives against the SA framework
Stage B2	Developing the Plan's options
Stage B3	Predicting the effects of the draft Plan
Stage B4	Evaluating the effects of the draft Plan
Stage B5	Considering the ways of mitigating adverse effects and maximising beneficial effects
Stage B6	Proposing measures to monitor significant effects of implementing the Plan
SA Stage C	
Stage C1	Preparing SA report
SA Stage D	
Stage D1	Public participation on the SA report and the draft Plan
Stage D2	Assessing significant changes
Stage D3	Making decisions and providing information
SA Stage E	
Stage E1	Finalising aims and methods for monitoring
Stage E2	Responding to adverse effects

1.9 The table below shows the stages that are involved in preparing the Plan and how the SA relates to each stage. It also shows the stages relating to SEA and demonstrates how well the requirements of SEA can be accommodated in the SA process.

Table 2 The Plan Preparation Process

	Plan Preparation Stage	SA Process	SEA Process
Pre-production	Evidence Gathering	<b>Stage A</b> : Setting the context, the baseline and deciding on the scope	State A : Setting the context and objectives, establishing the baseline and deciding on the scope
Production	Prepare Issues and Options	<b>Stage B</b> : Developing and refining options and assessing the effects	<b>Stage B</b> : Developing and refining alternatives and assessing effects
		<b>Stage C</b> : Prepare SA report	<b>Stage C</b> : Prepare the Environmental Report
	Public Participation on draft Plan	<b>Stage D</b> : Consulting on the draft SA and SA report	<b>Stage D</b> : Consulting on the draft plan or programme and the Environmental Report
	Representations on Preferred Options		
	Prepare Submission Plan		
Submit Plan to Secretary of State			
Examination	Independent Examination	↓	↓
	Inspectors Report		
Adoption	Adoption		
Monitoring	Implementation, Monitoring and Review	<b>Stage E</b> : Monitoring the significant effects of implementing the SPD	Stage E : Monitoring the significant effects of implementing the plan or programme on the environment

## The East Lindsey Local Plan

1.10 The first part of the East Lindsey Local Plan to be subject to SA is the Core Strategy. Once adopted, this will set out the overall vision, objectives and spatial planning strategy for development in the District 2028.

### 2007 Issues and Options SA

1.11 The Council prepared an Issues and Options document in November 2007 containing policy options for a range of topic areas. That document was subject to consultation and an SA was carried out by Faber Maunsell on behalf of the Council. Uncertainties over the preparation of the East Midlands Regional Plan led to some delay in preparing the draft Core Strategy. The Panel Report into the East Midlands Regional Plan (confirmed in the approved Plan of March 2009) proposed that future housing development in East Lindsey should comprise only of existing commitments (i.e. Houses under construction, or with planning permission and allocated sites without permission) pending the findings of a Coastal Study to assess the implications of climate change. Despite this, an interim Core Strategy

was prepared on this basis, which meant that 2009 Core Strategy could not contain new housing growth, and this also affected the overall strategic approach across the District. Consultation was carried out in October 2009 and an SA was carried out by AECOM (which took over Faber Maunsell in the intervening period). In May 2010 there was a change of national government and very soon it was announced that Regional Plans were to be abolished. There were challenges to this, and the intervening period left a lot of uncertainty as to how to progress with the Core Strategy.

1.12 A draft Coastal Study has been prepared, although it has not been formally adopted by the participating Authorities. As the Regional Plan moved towards abolition, there was no longer the opportunity to review its policies and so it was left to the Local Planning Authorities affected by the Coastal Study to move forward with the findings. The uncertainty over the Regional Plan interrupted the preparation of the Core Strategy but the Council is now in a position to develop its housing figures and start to move forward with a Core Strategy that plans positively for the future.

1.13 Work on the 2009 Core Strategy has been carried forward into the current Core Strategy, where possible; including the SA of the policies proposed at that time. However, the opportunity has been presented to look afresh at the policies in the light of changes in national planning policy and changes to the planning system. As a number of options have already been tested, there is no need to test them as part of this document. However, the Options for Growth are being publically tested through this version of the Core Strategy for the first time and these options have been tested through the SA.

1.14 As a result of the evolution of the plan, outlined above, the 2012 Core Strategy is something of a hybrid document. It contains the preferred policy approach (preferred options) for most policies areas, following on from previous stages of consultation, but contains options consultation for matter of growth. This approach does not slip neatly into the template for SA, however, the approach taken is to complete the appraisal templates for each policy or options, so that a comprehensive assessment has taken place at each stage. On this occasion, the SA is being carried out in-house.

1.15 The Council is required to carry out an Equalities Impact Assessment and Government also highlight the carrying out of a Health Impact Assessment as good practise.

1.16 An analysis of the population of the District has been carried out against the equalities groups identified in the legislation. Of the groups identified, the most significant equalities issues affecting East Lindsey are in relation to disability (and health) and age, due to the higher than average elderly population. Into this, although not part of the equalities legislation, the Council consider that access to transportation is an issue pertaining to East Lindsey. Lack of access to private transport, combined with limited bus services in some areas, can impact on people's ability to access services and facilities (including health care), employment etc. Many of the factors relating to these identified equalities issues are already included in the SA, for example, promoting access to services and facilities, and sustainable modes of transport; supporting inclusive, safe and vibrant communities; and, ensuring local housing needs are met. It is felt that all

issues that need to be considered in addressing equalities are contained within the SA. In addition, those completing the assessment forms have been required to ask the questions: To what extent will the proposed policy achieve equal opportunities for Gender; Age; Disability; Race; Religion/Belief and Sexual Orientation groups or impact upon them; and Is there a risk associated with the proposed policy or provision that the equality duty will not be met if it has an impact on particular persons or groups.

1.17 The indicators drawn up for the Sustainability Appraisal have been analysed and it has been determined that a number of them contain factors that would be part of a Health Impact Assessment. These factors include access to services and facilities (including health care facilities); access to opportunities to exercise (be these formal sports facilities or green infrastructure); reducing the fear of crime, which can have an impact on people's health; minimising social exclusion through access to services, employment, safe environments etc; and access to suitable housing.

1.18 As all these factors are already covered by the SA, it makes good practical sense to incorporate these into one overarching assessment and the Council decided that it would undertake the assessment in-house within the SA process.

1.19 Initially, each policy or option has been appraised by the officer writing the policy. The appraisal sheet has then been peer reviewed and amended as necessary by the officer overseeing the SA. The negative impacts have been drawn out of the assessment sheets, and where appropriate mitigation can be recommended, this has been included in the main body of the report.

## Stage A - Scoping

### Scoping Report

2.1 As part of the work on preparing the East Lindsey Local Development Framework (LDF), the Council commissioned consultants to carry out a Sustainability Appraisal of the Development Plan Documents (DPDs). The first part of their work was to prepare a scoping report to comply with Stage A of the SA guidance. The Scoping Report reviewed the Plans, Policies and Programmes relevant to Sustainability Appraisal and the LDF and used the context they provided to draw up sustainability objectives to assess the plan.

2.2 The breadth and detail of the Scoping Report, and the fact that it has been subject to consultation, provides a robust assessment and there would be no advantage in duplicating the work for this SA. The work has been refreshed to take account of any changes in the intervening period. The scoping report is not subject to formal consultation at this stage, due to its previous extensive consultation, however any comments made will be reviewed.

2.3 The Scoping Report can be seen on the Council's web site at [www.e-lindsey.gov.uk](http://www.e-lindsey.gov.uk).

### Baseline Information

2.4 The SA Scoping Report also contains baseline indicators which can be used to draw up monitoring indicators for the policy. The base information is set out in Appendix C of the full Scoping Report.

### Identifying Sustainability Issues and Problems

2.5 The scoping report contains a fuller description of the issues affecting East Lindsey, however, below are the key sustainability issues highlighted in the Scoping Report.

Table 3 Sustainability Issues and Problems

<b>Key Sustainability Issues</b>
Communities
<ul style="list-style-type: none"><li>• Compared to that of the East Midlands and the UK as a whole, East Lindsey's population has a relatively high proportion of elderly, economically inactive and infirm people. This places significant pressures on essential services.</li><li>• Demographic imbalance is exacerbated by high outward migration of young adults and inward migration of retirees.</li><li>• Only 5% of the District could be termed "urban", with no single dominating urban centre and over 200 small rural settlements widely dispersed. Physical isolation raises difficulties accessing essential services and facilities for some parts of the community, particularly those without access to a car.</li><li>• The District's rural character and tranquillity is a valued by residents and visitors.</li><li>• The District is a fairly 'healthy' place to live. However, there are a relatively high number of households (24% according to the 2001 census) with one or more residents with a long-term limiting illness, reflecting the demographic imbalance.</li><li>• Access to green infrastructure is relatively limited. Whilst there is an extensive rights of way network there are comparatively few sites with public access.</li><li>• East Lindsey does not suffer from large scale social deprivation. However, there are</li></ul>



localised 'pockets' where this is a significant issue with a dependency on benefit, particularly along the coast.

- Crime in the District is relatively low, with low crime rates in most categories of key offences, but fear of crime, especially vandalism and anti-social behaviour, remains a concern for many older residents.

#### Housing

- There is significant shortage of affordable housing throughout the District, with over 5,000 households on the Council's housing register; as well as a lack of 'appropriate' housing (e.g. mixed use housing).
- Pressure to increase housing densities to meet demand as the availability of development sites decreases nationally raises issues in a rural District that may not apply in urban areas.
- Poor quality housing and inappropriate design that harms the intrinsic character of settlements is an issue in many communities. This can lead to a loss of local distinctiveness.
- The prioritisation of use of brownfield sites is challenging given the rural nature of the District, the limited supply of brownfield sites.
- There is likely to be increasing pressure to limit development within river floodplains and coastal inundation areas due to flood risk.
- Uncertainties regarding the future funding and provision of flood defences, sea level rise, will have an impact on development dependant on such defences.

#### Transport and Accessibility

- The lack of availability of public transport (i.e. lack of service provision, accessibility and a perception of unreliability) is a significant issue across the District.
- Rural isolation and poor access, particularly for those without access to private transport, can be linked to other issues such as health, physical isolation, recreation, quality of life, employment opportunities etc.
- Car dependency is high in the District.
- The capacity of emergency services to access and if needed evacuate people (i.e. during flooding events) is an issue to consider when determining whether new development can be considered 'safe'.

#### Economy

- The District has a relatively low percentage of employees working full time, a high number of self employed workers and a high proportion of residents classed as non-economically active. This means that there are fewer people of working age contributing to the local economy to sustain the services needed to support the large numbers of older people.
- The District is reliant on the two traditional dominant industries of agriculture and seaside tourism where there is also a significant reliance on seasonal work. With a relative lack of skilled employment and high levels of seasonal unemployment.
- The long term future of the coastal tourism industry could be significantly affected by climate change and sea level rise.
- There are opportunities to widen the tourism offer through greener, more sustainable tourism in areas such as the Wolds Area of Outstanding Natural Beauty (AONB), along waterways such as the Louth Navigation and along the wild coast.
- A recognised need to encourage greater levels of inward investment and innovation, to diversify the overall economy of the District, and to support the agricultural industry in providing suitable alternative employment opportunities.
- The shortage of skilled workers and employees with management capabilities presents a skills shortage that can deter inward investment.

#### Environment, Landscape and Biodiversity

- The District has a rich and diverse natural heritage, including inland and coastal sites and habitats that have nature conservation and / or geological value.
- Pressures to develop land in rural areas, adjacent to urban centres and along areas of the coast line are considered key issues.
- Biodiversity sites with national or international status are statutorily protected from the harmful effects of development; however, potential threats to sites with lower

levels of statutory protection (i.e. LWS) will require greater attention.

- Conservation of biodiversity (including improvement and enhancement) should cover all development, not just those located on or near a sensitive site.
- A key issue will be how to balance the need to respect the District's distinctive character and landscape (i.e. Lincolnshire Wolds AONB) and to diversify the rural economy through the introduction of more uses, especially tourism, into the countryside and around the market towns.
- Other landscape related issues identified include the potential for inappropriate development associated with the conversion of derelict farm buildings; and the impacts of proposed energy projects and telecommunications developments.
- Need to balance the aim of protecting the character and integrity of historic buildings, and of integrating sustainable design and construction into new and restored buildings.
- Water resources and water availability will be key considerations for all new developments. Key issues include the availability of potable water to supply new developments in some locations and the increased surface water discharges from hard surfaces of new developments.
- Dark skies contribute significantly to the character of the District and there is need to provide protection from light pollution.
- Issues associated with waste removal are key as pressure upon existing landfill sites increase in line with a decrease in their capacity. New development should follow the 'reduce, reuse, recycle' principle through the design, construction and completion stages.

#### Climate Change

- Addressing the causes and effects of climate change is the Government's principal concern for sustainable development. It demands action at the local level.
- Projected weather patterns of hotter and drier summers, wetter and warmer winters and more intense periods of rainfall may lead to more regular and possibly extreme flood events. There are three sources of flooding within the District: from the sea, from rivers and from drainage infrastructure. Adapting to flooding and climate change is one of the most significant challenges to be faced by the District. Spatial adaptation, rather than continued reliance on mitigation measures, may be required in the long term.
- The continued inward migration of elderly people into areas with a high risk of flooding is a cause for concern.
- The need to facilitate the development and investment necessary to diversity and regenerate the District's communities needs to be balanced against flood risk.
- The District will be required to respond to the national and regional demands for increased renewable energy supplies. Impact on the landscape and the food-growing potential of the countryside is an issue.
- Increased energy efficiency will be an essential requirement for the design, construction and operation of all new development. The standards of the Code for Sustainable Homes (2006), its updates and subsequent Government targets and guidance will need to be embedded into design and construction policies.

## Sustainability Objectives

2.6 The Scoping Report sets the Objectives to be used in carrying out Sustainability Appraisal. These were developed from the plans, programmes, baseline information and issues collected during the Scoping stage; as well as responses to the consultation process. The table below shows the objective along with the sub-objectives that they encompass. The objectives will be used through out the SA process to provide a consistent assessment of the Plan.

SA Objective	SA Sub-objective: will the policy....
<p>1. Protect and enhance the quality and distinctiveness of the areas' biodiversity (native plants and animals) and geodiversity.</p>	<ul style="list-style-type: none"> <li>• Protect and provide opportunities for improving / enhancing sites designated for their nature conservation value / geodiversity value (local and national levels)?</li> <li>• Protect the habitats and species protected by International and UK law?</li> <li>• Help achieve Lincolnshire Biodiversity Action Plan (BAP) targets?</li> <li>• Help to avoid / reduce the loss of / decline in semi natural habitats, agricultural habitats, urban habitats / geological resources?</li> <li>• Conserve species and protect the districts overall biodiversity?</li> </ul>
<p>2. Protect and enhance the quality and distinctiveness of the area's landscapes, townscapes and historic environment.</p>	<ul style="list-style-type: none"> <li>• Protect and provide opportunities to enhance the distinctive landscapes (e.g. Conservation Areas, Lincolnshire Wolds AONB) within the district?</li> <li>• Will it maintain and, where possible, increase the area of high quality green infrastructure within the district – e.g. woodlands, public rights of way etc?</li> <li>• Will visual aspects / amenity be compromised?</li> <li>• Provide opportunities to enhance the townscapes within the district – e.g. promotion of the repair and re-use of historic buildings?</li> <li>• Maintain and enhance the character / distinctiveness of towns and villages (including conservation areas)?</li> <li>• Protect or enhance known features of historical, archaeological, or cultural interest, including their setting?</li> <li>• Protect areas associated with a known high risk archaeological resource where actual and / or quality / quantity of finds is not known e.g. features associated with buried archaeology?</li> </ul>
<p>3. Protect natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses and pollution.</p>	<ul style="list-style-type: none"> <li>• Contribute to effective management of water resources (surface and ground waters) via a reduction in water consumption (domestic, commercial, industrial, agricultural)?</li> <li>• Will it contribute to effective management of water resources (surface waters) via storage of excess precipitation?</li> <li>• Reduce diffuse and point source water pollution (e.g. from STWs, commercial, industrial and agricultural sources) and therefore contribute to 'good ecological status' for all water bodies?</li> <li>• Protect the habitats and species reliant on the water environment e.g. in rivers, canals, lakes, ponds and adjacent areas of wetland habitats?</li> <li>• Avoid an increase in light pollutants, particularly in more rural areas and the Lincolnshire Wolds AONB?</li> <li>• Protect the best and most versatile agricultural land?</li> <li>• Encourage appropriate use of finite resources, waste reduction and re-use and recycling of material for all new developments (construction and operational phases)?</li> </ul>
<p>4. Avoid the risk of flooding (where possible)</p>	<ul style="list-style-type: none"> <li>• Will it minimise flood risk to people, property, agricultural land and other assets from rivers and</li> </ul>

<p>and fully mitigate against the impacts of flooding where it cannot be avoided.</p>	<p>from drainage infrastructure e.g. resulting from intense or prolonged precipitation?</p> <ul style="list-style-type: none"> <li>• Will it minimise flood risk to people, property, agricultural land and other assets from coastal inundation e.g. via storm surges?</li> <li>• Increase flood risk to people, property, agricultural land and other assets downstream of the proposed development?</li> </ul>
<p>5. Promote viable and diverse economic growth that supports communities within the district.</p>	<ul style="list-style-type: none"> <li>• Promote sustainable economic growth?</li> <li>• Contribute to a low carbon economy in accordance with the principles set out in the Stern Report (October 2006)?</li> <li>• Provide diversity in the economy and encourage sustainable business development?</li> <li>• Encourage the rural economy and support farm diversification?</li> <li>• Assist the provision of appropriate land and premises for business activity?</li> <li>• Support the growth of sectors that offer scope to reduce outcommuting, e.g. to Lincoln, Grimsby and Boston?</li> <li>• Improve access to education and training, and support provision of skilled employees to the economy?</li> <li>• Improve opportunities for and access to, affordable education and training (basic skills, advanced skills)?</li> <li>• Promote employment opportunities and the diversification of employment opportunities (including skilled opportunities – professional and managerial occupations) and reduce the outmigration of skilled workers?</li> <li>• Enable tourism opportunities to be exploited?</li> </ul>
<p>6. Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites.</p>	<ul style="list-style-type: none"> <li>• Promote the efficient re-use of land and buildings for new developments and ensure that more dense developments well designed and are associated with good public transport systems to help achieve the most sustainable pattern and types of development?</li> <li>• Protect the best and most versatile agricultural land?</li> </ul>
<p>7. Improve accessibility to key services, facilities amenities and green infrastructure including the promotion of sustainable modes of access.</p>	<ul style="list-style-type: none"> <li>• Improve access to local services, facilities, places of employment and green infrastructure for all residents throughout the district?</li> <li>• Provide improved and sustainable public modes of transport in both urban and rural areas and reduce the need to travel by car?</li> </ul>
<p>8. Increase reuse and recycling rates and minimise the production of waste.</p>	<ul style="list-style-type: none"> <li>• Reduce waste generated as part of all building programmes?</li> <li>• Reduce household waste?</li> <li>• Increase waste recovery and recycling (domestic, commercial etc)?</li> </ul>
<p>9. Support inclusive, safe and vibrant communities.</p>	<ul style="list-style-type: none"> <li>• Help achieve the most sustainable pattern and types of development with a view to developing sustainable communities?</li> <li>• Improve the quality of life for communities by allowing residents to become actively involved in decision making at a local level?</li> <li>• Maintain, enhance and create green infrastructure</li> </ul>

	<p>assets (e.g. green space) across the district accessible to the whole community?</p> <ul style="list-style-type: none"> <li>• Promote more diverse and cohesive communities?</li> <li>• Improve the availability and accessibility of key local services and facilities, including health, education and leisure (shops, post offices, pubs etc.) that also reduce the need to travel?</li> <li>• Reduce the fear of crime, the actual levels of crime, antisocial behaviour and improve public safety?</li> <li>• Promote and encourage design principles that positively reduce crime and antisocial behaviour?</li> </ul>
10. Ensure that local housing needs are met.	<ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes, including affordable housing, to meet the identified needs of all sectors of the community?</li> <li>• Enable first time buyers to purchase a home?</li> <li>• Ensure the adoption of sustainable construction and design principles in line with the Code for Sustainable Homes?</li> </ul>
11. Increase energy efficiency and ensure appropriate sustainable design, construction and operation of new developments.	<ul style="list-style-type: none"> <li>• Contribute to a reduction in energy/resource consumption (e.g. domestic, commercial, and industrial).</li> <li>• Lead to an increased proportion of energy needs being met from renewable sources e.g. at domestic and commercial scales?</li> <li>• Ensure all new housing incorporates at least some energy saving measures?</li> <li>• Lead to local developments built to a high standard of sustainable design?</li> <li>• Reduce waste generated as part of all building programmes?</li> <li>• Reduce household waste and increase waste recovery and recycling (domestic, commercial etc)?</li> </ul>
12. Encourage and provide the facilities and infrastructure for "healthy lifestyles"	<ul style="list-style-type: none"> <li>• Ensure that adequate health facilities and infrastructure is available for present and future generations?</li> <li>• Ensure health facilities are accessible to all sectors of the community?</li> <li>• Reduce health inequalities across the district?</li> <li>• Promote healthy and active lifestyles?</li> <li>• Maintain, enhance and create green infrastructure assets (e.g. green space, recreation and sports facilities, semi-wild/rural places) across the district accessible to the whole community?</li> </ul>
13. Positively plan for, and minimise the effects of, climate change.	<ul style="list-style-type: none"> <li>• Minimise flood risk to people, property, agricultural land and other assets from the sea, from rivers and from surface water drainage infrastructure?</li> <li>• Increase flood risk to people, property, agricultural land and other assets downstream of the proposed development?</li> <li>• Contribute to effective management of water resources (surface waters) (e.g. storage of excess precipitation)?</li> <li>• Promote appropriate energy production technologies at the district scale?</li> <li>• Contribute to a reduction in emissions of greenhouse gases within the district?</li> </ul>

2.7 The SEA guidance does not require the setting of objectives. However, the impact on the environment should be assessed and Schedule 2 Paragraph 6 of the Environmental Assessment of Plans and Programmes Directive 2004 lists the issues that should be considered. The table below shows how the Sustainability Objectives link to the issues identified through SEA.

Table 5 Sustainability Appraisal Objectives

Sustainability Appraisal Objective		SEA Issues
1	Protect and enhance the quality and distinctiveness of the areas' biodiversity (native plants and animals) and geodiversity.	Flora, Fauna and Biodiversity
2	Protect and enhance the quality and distinctiveness of the areas' landscapes, townscapes and historic environment	Landscape and Cultural Heritage
3	Protect natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses and pollution	Air; Climatic Factors; Water; Flora, Fauna and Biodiversity; Population and Human Health
4	Avoid the risk of flooding (where possible) and fully mitigate against the impacts of flooding where it cannot be avoided	Cultural Heritage; Water; Climatic Factors; Population and Human Health; Material Assets
5	Promote viable and diverse economic growth that supports communities within the district	Population and Human Health
6	Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites.	Material Assets; Flora, Fauna, Biodiversity; and Soil
7	Improve accessibility to key services, facilities, amenities and green infrastructure including the promotion of sustainable modes of access.	Population and Human Health; and Climatic Factors
8	Increase reuse and recycling rates and minimise the production of waste	Population and Landscape
9	Support inclusive, safe and vibrant communities	Population and Human Health
10	Ensure that local housing needs are met	Population and Material Assets
11	Increase energy efficiency and ensure appropriate sustainable design, construction and operation of new development.	Population and Material Assets
12	Encourage and provide the facilities and infrastructure for healthy lifestyles	Population and Human Health
13	Positively plan for, and minimise the effects of, climate change	All SEA topics

## Stage B - Appraisal

### Stage B1

#### Vision and Strategic Actions

3.1 The initial stage of testing is stage B1 where the objectives of the Plan are tested against the Sustainability Objectives drawn from the Scoping Report. This will assess whether or not the vision and strategic actions set a framework that will enable a sustainable policy approach to emerge. If these are not compatible, or are lacking in some way, they should be amended to improve their ability to meet the sustainability objectives wherever possible.

3.2 The Core Strategy Vision and Objectives were first appraised in 2007 at the Issues and Options stage. The 2009 Core Strategy contained a revised Vision and Objectives which were also appraised. In summary, they generally performed well against the majority of SA objectives. With the most significant concerns being potential conflict between the building of houses and natural resources, however, this would be mitigated by other strategic objectives.

3.3 The Vision and Objectives have again been refined and so have been reassessed. The Plan now contains a vision in six parts. However, it does not contain objectives in the traditional sense. The vision is underpinned by a series of statements (between two and seven) for each element of the vision statement, that read as strategic actions for how the elements of the vision can be achieved. These have been appraised as objectives but have therefore been referred to as "actions" throughout the Appraisal. This is as follows:-

"By 2028, East Lindsey will be a district with:-

- ***A network of thriving, safer and healthy sustainable communities, where people can enjoy a high quality of life and an increased sense of well-being and where new development simultaneously addresses the needs of the economy, communities and the environment.***
- ***Quality affordable and open market housing to meet the differing needs of the District's residents.***
- ***A growing and diversified economy that builds on, and extends, the important agriculture and tourism base.***
- ***An inclusive, equal and diverse district that has addressed the issues of deprivation and rural isolation.***
- ***A high quality environment that makes the most of its special qualities, particularly the coast, the Lincolnshire Wolds and the historic market towns; and***
- ***A commitment to tackling the causes and effects of global climate change through local action.***

*To achieve our vision of a network of thriving, safer and healthy sustainable communities, where people can enjoy a high quality of life and an increased sense of well-being and where new development simultaneously addresses the needs of the economy, communities and the environment, we will;-*

- **Define a pattern of settlements and identify broad areas for growth.**
- **Protect and enhance the vitality and viability of our town centres.**
- **Require new development to contribute to improving the environmental quality of our spaces and places.**
- **Protect and improve essential community facilities in towns and villages**
- **Ensure that infrastructure is capable of accommodating planned growth.**
- **Develop where possible on previously used land.**
- **Support the work of communities in neighbourhood planning.**

*To achieve our vision of having affordable and good quality housing to meet the differing needs of the District's resident, we will;-*

- **Provide land for housing development to meet housing needs until 2028.**
- **Enable the provision of affordable homes to meet local needs and reduce the current shortfall of supply.**

*To achieve our vision of having a growing and diversified economy that builds on, and extends, the important agriculture and tourism base, we will;-*

- **Encourage and enable business to locate and expand within the District.**
- **Encourage and enable rural and farm diversification schemes.**
- **Widen and support opportunities for high quality, sustainable tourism throughout the District.**

*To achieve our vision of an inclusive, equal and diverse district that has addressed the issues of rural isolation and deprivation, we will;-*

- **Cater for the accommodation needs of gypsies and travellers**
- **Support community led initiatives that improve access to services and facilities in our rural communities.**
- **Help to tackle the causes of coastal deprivation.**

*To achieve a high quality environment that makes the most of its special qualities, particularly the coast, the Lincolnshire Wolds and the historic market towns, we will;-*

- **Require new development to contribute to improving the environmental quality of our spaces and places.**
- **Conserve and enhance areas of natural history or landscape importance, in particular the Lincolnshire Wolds Area of Outstanding Natural Beauty, the Coastal Country Park, and the Coastal Grazing Marshes.**
- **Conserve and enhance buildings and areas of architectural or historic interest.**

*To achieve our vision of a commitment to tackling the causes and effects of global climate change through local action, we will;-*

- **Maintain and enhance the Districts biodiversity.**



- ***Encourage new development to be energy-efficient and carbon neutral.***
- ***Support the economy of the coastal communities whilst not putting more people at risk from flooding.***
- ***Locate development to minimise traffic generation.”***

3.3 The degree of compatibility between these and the sustainability objectives has been assessed using a colour coding system, along with a commentary. The colour coding is:-

- Green – Vision or Action accords with the objective;
- Yellow – Vision or Action would have a negative effect without mitigation, positive or neutral effect with mitigation;
- Blue – Vision or Action has no link to objective;
- Purple – Vision or Action has impact on the objective that cannot be quantified;
- Red – Vision or Action does not accord with the objective.

3.4 Appendix 1 of this report contains the tables setting out the results of that assessment.

## **Summary**

3.5 The impact of the broad vision statement on the objectives is largely neutral or positive; which is to be expected given the strategic and positive nature of the vision statement. The exception is the strand of the vision statement “A growing and diversified economy that builds on, and extends, the important agriculture and tourism base.” The element of growth is not quantified in the vision, nor does it specify the location/s where growth will take place. It is therefore not possible to establish if there will be any impact on the sustainability objectives relating to biodiversity, landscape and natural resources. It will down to the policies of the plan and the settlement proposals to address this level of detail and mitigate any impacts.

3.6 Part one of the vision “*a network of thriving, safer and healthy sustainable communities, where people can enjoy a high quality of life and an increased sense of well-being and where new development simultaneously addresses the needs of the economy, communities and the environment*” contains a number of actions relating to both the physical growth and the cohesiveness of settlements. Again, most of the impacts are broadly neutral or positive. The other impacts are all in the “cannot be quantified” category. Like those in paragraph 3.5 above, this is due to the actions not having a spatial element specifying the location of the growth, which would be central in assessing its likely impact.

3.7 The second part of the vision “*having affordable and good quality housing to meet the differing needs of the District’s resident*” only has two actions; both relate to providing additional housing. As previously identified, this has resulted in a high number of “cannot be quantified” results as the impacts will be felt at a site specific level. There are also a high number of actions and objectives with no link, due to the specific nature of the actions. There are positive impacts for providing access to services and facilities, supporting inclusive and vibrant communities, and meeting local housing need. The objective in relation to flood risk has been judged to be “negative effect without mitigation, positive or neutral effect with

mitigation". Some of the District's areas of highest need for affordable housing are in the coastal area with the highest flood risk. The Plan has to strike the balance between these two issues. However, this part of the vision can be mitigated by ensuing policies.

3.8 The third part of the vision "*a growing and diversified economy that builds on, and extends, the important agriculture and tourism base*" has three actions around encouraging business investment and expansion. Again, there are a number of "cannot be quantified" results due to the location and amount of growth being unknown at this stage. There are also a high number of actions and objectives with no link, due to the specific nature of the actions. In the case of the action for sustainable tourism, the specific reference to *sustainable* tourism means that a lot of the impacts from this action are recorded as positive. However, the caveat has to be added to this assessment that the assumption has been that the ensuing development will be sustainable in the fullest sense, and will have taken into account all the necessary issues to fulfil this description. If development does not, there will be more negative impacts. Under the action to encourage and enable rural and farm diversification, there are two impacts judged to be "negative effect without mitigation, positive or neutral effect with mitigation". One is in relation to the objective on landscape quality as increased development in rural areas has the potential to impact negatively or positively on landscape quality. The policies will mitigate this to some extent by requiring any development to be accommodated within the environmental constraints of the location, which includes the landscape. The other potential impact requiring mitigation is in relation to the prioritisation of brownfield land. Increased development in rural areas has greater potential to increase the use of greenfield land, however, the plan has to be read as a whole and there is a policy in the plan that refers to this issue. However, the text of that policy could be strengthened by reference the balance to be struck between the needs of rural communities and the need to protect greenfield land, particularly high quality agricultural land, and the approach being taken by the plan in terms of rural economic development.

3.9 The fourth element of the vision "*an inclusive, equal and diverse district that has addressed the issues of rural isolation and deprivation*" contains three actions relating to gypsies and travellers; rural services and facilities; and coastal deprivation. There are a significant number of "cannot be quantified" results. These are due to: no location can be identified for a suitable site or sites for gypsies and travellers until the survey has been concluded; there being no locational element to the community led initiatives (as by their very nature, it is the community, not the Plan that is promoting them); and the way in which coastal deprivation is to be tackled do not yet have a spatial outlet. The fact that the coast contains some of the area's most important sites for nature conservation is a concern but this is not felt sufficient to raise this as a conflict at this stage, as community initiatives are generally smaller scale and predominantly located within existing towns and villages, reducing their impact on the wider landscape or biodiversity. Concern may arise more acutely at the site specific or policy setting stage. There is one conflict in the assessment for this section, relating to catering for the needs of gypsies and travellers and the objective to increase energy efficiency and sustainable design and construction. In the case of the travelling community, there is little opportunity to address the impact on the objective due to the inherent nature of the preferred accommodation of this group.

3.10 The fifth element of the vision is “a high quality environment that makes the most of its special qualities, particularly the coast, the Lincolnshire Wolds and the historic market towns” the actions relate to enhancing the quality of our places and space, the landscape and historic areas and buildings. The anticipated impact of these actions on the objectives is neutral or positive. Where the impact is regarded as neutral (no link) but there is a tenuous connection the link would always lean towards the positive albeit indirectly.

3.11 The sixth and final part of the vision, “a commitment to tackling the causes and effects of global climate change through local action”, contains some challenging actions in relation to biodiversity, energy efficiency flood risk and traffic generation. Most of these impacts are anticipated to be neutral or positive. The only exception is the action to maintain and enhance the district’s biodiversity in respect of the sustainability objective to prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites. This is identified as “cannot be qualified” as there may be biodiversity interest on brownfield sites that have remained untouched for some time. However, it is not until the individual sites are identified and surveyed that this can be established.

Key Points

3.12 The issues emerging as potential conflict without mitigation are:

<b>Action</b>	<b>Relevant Objective</b>	<b>Recommendation</b>
Encourage and enable rural and farm diversification schemes	2. Protect and enhance the quality and distinctiveness of the area’s landscapes, townscapes and historic environment	The ensuing policy includes reference to the environmental capacity of a site. So mitigation is already included.
Encourage and enable rural and farm diversification schemes	6. Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites.	The policy text could be strengthened by reference the balance to be struck between the needs of rural communities and the need to protect greenfield land, particularly high quality agricultural land, and the approach taken by the plan.

3.13 The only negative impact emerging from the appraisal is:

<b>Action</b>	<b>Relevant Objective</b>	<b>Recommendation</b>
Cater for the accommodation needs of gypsies and travellers	11. Increase energy efficiency and ensure appropriate sustainable	It is unlikely that mitigation can be put in place to address this

	design, construction and operation of new developments	conflict.
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3.14 The other key issue to be drawn from the vision and strategic actions are the number of unquantifiable impact, due to the volume and location of the envisaged growth not yet being determined.

## **Stage B2**

### **Options**

4.1 Stage B2 of the SA guidance requires that options are tested to see how they perform, relative to each other, against the sustainability objectives. As paragraph 1.10 – 1.12 of this report explains, options testing has already taken place as part of the evolution of the Core Strategy and the only options within this version of the Core Strategy are the Options for Growth.

#### Options from 2007 Issues and Options Document

4.2 Previous option testing was subject to public consultation alongside the 2007 Issues and Options document. In most cases, the option that performed best in the SA was followed through to the 2009 draft Core Strategy. However, there were three exceptions.

4.3 In the case of affordable housing, the option for exceptions sites performed less well in relation to access to services for rural communities. However, the Council has chosen to continue to pursue this option as it forms a valuable, and nationally accepted, part of a suite of policies to deliver affordable housing in rural areas. Early version of this policy had blanket support for this approach, but the current policy has now been amended to refer to the type of settlements where this will apply, based on the settlement pattern in the Core Strategy, which will help mitigate its impact.

4.4 Three options presented in 2007 for the issue of Making Essential Services Accessible for all. One of these, Catering for the Essential Use of the Car, unsurprisingly, does not perform as well as the others; with negative impacts for access to services and facilities and energy efficiency. The Council believe that the use of the car cannot be ignored in a deeply rural area such as East Lindsey, and local circumstances would not adequately addressed if this was not planned for. However, the potential impacts of this approach have been offset by the use of a cluster approach to development. This acknowledges the role smaller communities play alongside each other in providing services and supporting each other, minimising the need to travel.

4.5 The option chosen for flood risk, Improved Sea Defences to permit coastal regeneration, did not perform well against the SA objectives; having negative impacts for objectives on “avoiding the risk of flooding (where possible) and mitigating the impacts of flooding where it cannot be avoided”, and “positively planning for the effects of climate change”. However, the Council believes strongly that coastal communities should be protected and that coastal regeneration is vital to the life of these communities. The Coastal policy set out in the draft Core Strategy is designed to address this balance.

#### Options from the current Core Strategy

4.6 Following the resolution of the issues surrounding the Regional Strategy, the Council is now able to develop meaningful options for future growth. Some consultation was carried out in the 2007 Issues and Options document, and this has helped shape the options set out below.

**OPTION 1: CONCENTRATE GROWTH INTO THE FIVE INLAND TOWNS:**

Concentrate growth in the District's five key inland towns of Louth, Alford, Coningsby/Tattershall, Horncastle, and Spilsby. The proportions of development will be calculated based on existing populations. Housing in the villages will be permitted only using the exceptions policies.

**OPTION 2: MODERATELY DISPERSED DISTRIBUTION OF GROWTH**

This option proposes a spread of development across the District's five inland towns and the large villages outside the Coastal Flood Hazard Zones. The proportions of development will be calculated based on existing populations. Housing in the other villages will be permitted only using the exceptions policies.

**OPTION 3: MORE DISPERSED PATTERN OF GROWTH**

Development is spread across the five inland towns, (23) large and (38) medium villages outside the Coastal Flood Hazard Zones, in order to give a more widespread sustainable pattern of growth throughout the District. The proportions of development will be calculated based on existing populations. Housing in the small villages will be permitted only through the use of the exceptions policy.

**OPTION 4: DISPERSED PATTERN OF GROWTH INCLUDING THE SMALL RURAL VILLAGES**

Development is spread across the five inland towns, and the large, medium and small villages outside the Coastal Flood Hazard Zones.

4.7 Each of these options has been assessed against the thirteen sustainability objectives. A full appraisal is included as appendix 2 to this report; below is a summary of likely effects.

4.8 Option 1 has a number of positive impacts in relation to the sustainability objectives. However, there is likely to be a significant negative impact on local landscapes and significant loss of greenfield land as a result of large urban extensions to the towns. There are positive benefits to the towns in terms of access to services and facilities, and access to healthy lifestyles, but this could lead to a negative impact on other settlements as facilities would tend to be concentrated in the towns. The option could also lead to a shortage of housing in the other settlements, especially affordable housing, and if facilities contract in the other settlements it could lead to an increase in vehicle journeys as those in the rural parts of the district access the services and facilities in the towns. There are potential positive benefits for the ability to respond to climate change issues. There are also uncertainties in respect of biodiversity and impact on natural resources as the volume and location of development is not yet known in respect of each town.

4.9 Option 2 also provides a number of positive impacts in terms of the sustainability objectives. However, there are likely to be negative impacts on local landscapes, although the degree of impact may be less than option 1 as urban extensions may not need to be as large. Option 2 will also lead to significant loss of greenfield land. There are positive benefits to the towns in terms of access to services and facilities but this could also lead to a negative impact on other settlements as facilities would still tend to be concentrated in the towns. The option could also lead to a shortage of housing in the medium and

small settlements, especially affordable housing, and if facilities contract in these settlements it could lead to an increase in vehicle journeys as those in the rural parts of the district access services and facilities in the towns. Ultimately, there could be an increase in house prices in the more rural parts of the District, pushing up the affordability gap between houses prices and wages. There are potential positive benefits for access to healthy lifestyles and the ability to respond to climate change issues. However, there are uncertainties in respect of biodiversity and impact on natural resources as the level and location of development is not yet known for each settlement.

4.10 Option 3 supports open market and affordable housing across a wider range of settlements throughout the District and encourages the role of the medium settlements to be enhanced. This option also continues to provide a choice for both the rural and urban residents of the District in the place where they wish to live. Option 3 provides a number of positive impacts in terms of the sustainability objectives. However, there are likely to be negative impacts on local landscape, although the degree of impact may be less than previous options as this is balanced by the opportunities to assimilate smaller sites into the landscape. Another potential negative impact is development of greenfield land, which is likely in rural settlements. There are positive benefits in terms of access to services and facilities which would be supported in smaller communities. There are also greater opportunities to ensure local housing need is met. There are fewer opportunities for the effects of climate change to be mitigated with this option. The same uncertainties in respect of biodiversity and impact on natural resources exist until site selection takes place.

4.11 Option 4 provides both market and affordable housing across the widest range of settlements in the District. The option provides a number of positive impacts in terms of the sustainability objectives. There are likely to be negative impacts on local landscape. Although the degree of impact may be reduced, as there may be greater opportunity to assimilate smaller sites into the landscape, the impact will be spread across a higher number of settlements. This dispersal of development could also undermine the ability of development to support key infrastructure, services and facilities. The option could also increase the number of vehicle movements across the District as an increased number of people in the small villages access services and facilities in the larger settlement not available to them. There is likely to be significant use of greenfield land and there are fewer opportunities for the effects of climate change to be mitigated with this option. However, there are greater opportunities to ensure local housing need is met and the option could bring support for inclusive and vibrant communities to more places. The same uncertainties in respect of biodiversity and impact on natural resources exist until site selection takes place, although with more rural sites, there may be greater impact on biodiversity.

4.12 The options provide a range of ways of addressing the distribution of growth across the District. There positive and negative effects to each of the options that have to be born in mind when selecting an option. Following the consultation, an option will be selected and suitable strategic policy written.

## Stages B3, B4 and B5

### Predicting and Evaluating the effects of the draft Plan

#### Appraisal of Policy and Mitigation

5.1 Stages B3, B4 and B5 of the SA process have been combined. Stage B3 is intended to predict the likely social, environmental and economic effects of the options or policies. Stage B4 evaluates these effects. B5 looks at possible mitigation that may be put in place to reduce any negative impacts.

5.2 Appendix 2 of this report contains the proforma appraisal sheets filled out for each of the policies in the Core Strategy. The impact on each SA objective has been recorded as either:-

- √√ - significant positive impact;
- √ - positive impact; - neutral impact;
- - neutral or no connection
- X - negative impact and
- XX - significant negative impact.

The evaluation of the impacts considers:

- The likelihood of that impact occurring (high, medium or low);
- The likely scale of the impact, i.e. local, district wide or beyond;
- The permanence, i.e. temporary or permanent; and
- The duration of the impact, short term, medium term or long term (short term related to the construction period, medium term 5 – 10 years after construction and long term 10 years plus).

5.3 The table below is a summary of the appraisal process for each policy. The summary of the options for growth in the Core Strategy as set out above in paragraphs 4.8 – 4.11.

<b><i>Strategic Policy 1 – A Sustainable Pattern of Places</i></b>
This key policy sets the scene for the Local Plan and forms a clear baseline from which to guide new growth, based on capacity to provide and sustain a pattern of viable communities across the District. As a result of its strategic nature, the majority of the direct impacts of the policy on the objectives are neutral. However, it forms a positive baseline for a number of other policies and therefore has potential positive impact on some of the sustainability objectives – improving access to services and facilities and supporting vibrant communities.
<b><i>Strategic Policies 2, 3 and 4 –Affordable Housing</i></b>
Overall, these policies have a number of potentially positive impacts on the objectives and only one negative impact as a result of possible building in flood risk areas. To a degree, this impact could be identified as uncertain, as it is not known exactly where these sites will emerge yet. However, as some of the areas of greatest need appear along the Coast, in the flood risk area, it is likely that there will be a degree of conflict to be addressed. Development in areas of flood risk will be subject to the sequential and exceptions tests, through the appropriate policies, and will require mitigation if it passes. Every effort has therefore been made to mitigate the impact, while still allowing development in areas of need. There are a number of other issues, such as biodiversity, landscape quality etc, where development of affordable housing may have



an impact but this cannot be quantified until the settlement proposals considers site selection, or planning applications area received for exception sites. However, other policies of the plan deal with these issues and will be used to mitigate potential impact.

***Strategic Policy 5 – Design***

There a number of positive impacts emerging from this policy and no negative ones. The design policy, working in conjunction with other policies of the plan, will assist in providing safe, inclusive communities in the District. Designing out crime will help to provide a safe environment for residents. Having design as a high priority will improve the character and vibrancy of the district. The policy text seeks to address the issues of light pollution, recycling, protection of water resources etc, however, this could be strengthened by a criterion within the policy itself that draws these paragraphs together and increases their prominence in the policy. Similarly, the matter of the prioritising brownfield land and the need to protect the best and most versatile agricultural land is a cross cutting theme, of great importance to the economy of the district, that is only mentioned in the text. This could also benefit from direct reference in the policy. The alternative would be to being these matters together in a discrete policy on natural resources, as agricultural land is also an important natural resource.

***Strategic Policy 6 – Gypsies, Travellers and Show People***

The policy supports sites within safe walking distance or alongside towns, large and medium villages to reduce the need to travel to access services. It also supports mixed use of the sites with employment. There are a number of positive benefits accruing from the policy in terms of the sustainability objectives but one negative impact in relation energy efficiency. It is considered that the impact on energy efficiency is unavoidable and difficult to mitigate against due to the inherent nature of the preferred accommodation of this group. There are also two areas of uncertainty in respect of flood risk and prioritising brownfield land. While brownfield sites will be prioritised, the nature of and the location requirements for these sites is such that some loss of greenfield land may occur. An anomaly has also been identified between this policy and the Coastal Policy, in that the period of occupation allowed for gypsy and traveller accommodation differs from that for other caravans on the coast and this could be viewed as discriminatory.

***Strategic Policy 7 – Inland Employment***

There are a number of positive impacts in respect of viable and diverse economic growth; and supporting inclusive and vibrant communities. It can also help in positively planning for climate change by supporting home working and the use of new technologies this could reduce the number of vehicle journeys and assist with the sustainability of settlements. Uncertainty of impacts centres on biodiversity and landscape as there is no locational aspect to the policy beyond the towns where additional employment land is needed.

***Strategic Policy 8 – Town/Village Centres and Shopping***

The Policy aims to promote the role of town centres as the focal point of community activity, maintaining their distinctiveness and their economic vitality. As a consequence, its impacts will be of greatest benefit to the community elements of the sustainability spectrum. There is one unquantifiable impact, in respect of natural resources.

***Strategic Policy 9 – Widening the Tourism and Leisure Economy***

The inland tourism policy will support the diversification of tourism. There are some positive aspects to the policy, judged against the sustainability objectives, in respect of economic development and access to services and facilities. Used in conjunction with the other policies in the plan, there should be reduced journey times and high quality sustainable development which does not harm the biodiversity or landscapes of the District. There is one tension in the policy, showing as a potential negative impact, in respect of the policy seeking to promote the Lincolnshire Wolds AONB as a tourism resource, while the landscape policy seeks to give this area the highest level of protection. Using the landscape policy in conjunction with this policy should afford additional protections and seek to maintain the quality of intrinsic landscape quality of

the AONB. The other negative impact is in respect of objective 7 to improve accessibility to key services, facilities amenities and green infrastructure including the promotion of sustainable modes of access. Some of the criteria have a spatial element to them; however, the change of use of buildings to holiday accommodation does not. This part of the policy does not therefore seek to improving access to services and facilities or promoting sustainable modes of access, in that it, in principle, look positively on development in isolated locations.

### ***Strategic Policy 10 – Inland Flood Risk***

There are a number of positive impacts from this policy but there are also some uncertainties. On impact on natural resources it is unclear what the impact will be at this stage, similarly, work on flood defences could have an impact on biodiversity, particularly if work is undertaken in river courses, but it may be that this can be mitigated at the design stage. In the case of supporting inclusive, safe and vibrant communities, the impact has been recorded as a mixed positive and negative. Due to the breadth of the objective, the policy can meet some parts but not others, although flood mitigation measures will help offset the concerns about community safety.

### ***Strategic Policy 11 – Coastal East Lindsey***

The coastal policy is neutral or has a positive impact on many of the objectives set out in the appraisal in that it supports development that will enable continued sustainable growth of the coastal area. Housing is limited to that which maintains the present population at a broadly stable rate, but housing for vulnerable groups and affordable housing has been taken out of the restriction, reflecting the high need for this type of housing along the coast and the fact that many parts of it are in areas of deprivation. There is some uncertainty over the impacts of the policy on biodiversity and landscape, as the location and volume of development being supported through this policy is not yet known. Protection through other policies of the plan is afforded to areas of landscape sensitivity and key protected areas of biodiversity importance, whilst still meeting the Councils key driver of supporting development that extends and diversifies all-year round employment and directly contributes to the local economy. There are considered to be three negative impacts on the objectives. Objective 4 – Avoiding Flood Risk (where possible) and the safety element of Objective 9. The policy is seeking to strike a balance between the needs of communities and the concerns over flood risk issues. This balance is demonstrated by the fact that a number of the impacts of the policy are also positive and these would then become negative if a more restrictive framework were put in place for the coast. One apparent anomaly is in respect of the use of a occupancy conditions to restrict the use holiday chalets and caravans at the most high risk times of the year. However, this occupancy condition has not been extended to the change of use of buildings to holiday lets, or for new hotel and bed and breakfast facilities. This difference in approach should be explained in the text. The other negative impact is in respect objective 7 to improve accessibility to key services, facilities amenities and green infrastructure including the promotion of sustainable modes of access. Some of the criteria have a spatial element to them, however, economic development, coastal country park and change of use of buildings to holiday accommodation do not. These parts of the policy are therefore not improving access to services and facilities or promoting sustainable modes of access, in that they, in principle, look positively on development in isolated locations.

### ***Strategic Policy 12 – Transport and Accessibility***

The transport policy tries to work toward minimising car journeys, especially in the urban settlements. In rural East Lindsey this will be problematic but the policy does try to balance these two issues, and locate development near to the centre of rural settlements, this will also assist in continuing to support rural services and facilities. As a result, the impacts are positive or neutral. Some of these neutral scores come from a balance between the positive aspiration of the policy and the reality of the situation in terms of car use and the rural nature of the District.

### ***Strategic Policy 13 – Open Space, Sport and Recreation***

The effects of the policy on the sustainability appraisal objectives are largely neutral or

positive. There is one uncertainty, in respect of use of greenfield land. Some sport and recreation uses can have a large land take and this often requires rural or edge of centre location which may well require the use of greenfield land and possibly agricultural land. At this stage, proposals under this policy cannot be predicted and the impact cannot be quantified.
<b><i>Strategic Policy 14 – Landscape</i></b>
The impacts of the policy are positive or neutral as the policy does not in itself proposed development but sets requirements for consideration as part of other proposals.
<b><i>Strategic Policy 15 – Green Infrastructure</i></b>
The impacts of the green infrastructure policy on the sustainability objectives are all positive or neutral. The policy is does not actively promote development, aside from additional green infrastructure initiatives, but is helping to shape new development and so is less likely to have negative impacts on sustainable development.
<b><i>Strategic Policy 16 – Biodiversity and Geodiveristy</i></b>
The impacts of this policy are all neutral or positive, as the policy does not in itself proposed development but sets requirements for consideration as part of other proposals.
<b><i>Strategic Policy 17 – Renewable Energy</i></b>
The renewable energy policy tries to strike a balance between the needs of climate change and government support for the renewables sector, and the need to protect local character and environment. The policy is generally more supportive of small and micro energy production that is likely to have a lesser impact on its surroundings. There are no negative impacts predicted for the policy, as it contains a number of mitigating criteria to try to address any potential concerns. There are some positive outcomes, although the majority of predicted impacts are neutral.
<b><i>Strategic Policy 18 – Infrastructure and Section 106 Obligations</i></b>
Infrastructure planning and delivery, either to enable development to occur or, to service the needs of the inhabitants of new development, is fundamental to sustaining communities whether in the shape of utilities or social infrastructure. This policy seeks to ensure that necessary provision is made at the outset by establishing, through the Infrastructure Delivery Plan, what deficiencies exist and how they will be met. The impacts of the policy are largely positive on the sustainability objectives as the policy is seeking to achieve positive outcomes for communities through infrastructure and also makes reference to sustainable development and landscape character in delivering the infrastructure.

### Key Points

5.4 In evaluating the predicted effects of the policies, most of them are permanent and long term. This is because much of the ensuing development will be in place for many years and its impacts will take many years to be assimilated, if indeed they can. It is therefore important that these impacts are mitigated, where possible.

5.5 There are a high number of uncertain impacts coming out of the policies, due to the fact that the Core Strategy does not allocate any sites and therefore the true impacts of some of the policies cannot be anticipated until the scale and location of development is known. More detail on the impacts of the application of policy will emerge at the Settlement Proposals stage, or planning application stage.

5.6 The policies where actions is suggested are:

<b>Policy</b>	<b>SA Objective</b>	<b>Suggested Action</b>
Strategic Policy 5 - Design	<p>3. Protect natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses and pollution.</p> <p>6. Prioritise appropriate re-use of previously developed land and minimise the loss of the best agricultural land and greenfield sites.</p>	<p>The majority of the key natural resources are mentioned in the text to the policy however, the policy would be strengthened with the inclusion of a criterion referring to protection of natural resources. This includes the prioritisation of brownfield land. However, there is no reference in the text to the need to protect the best and most versatile agricultural land. This is an important issue in East Lindsey and should be addressed by a criterion in the policy.</p> <p>Alternatively, these matters could be brought together in a discrete policy on natural resources, as agricultural land is also an important natural resource.</p>
Strategic Policy 6 – Gypsies, Travellers and Showpeople	9. Support inclusive, safe and vibrant communities.	<p>An anomaly has also been identified between this policy and the Coastal Policy in terms of the period of occupation allowed for gypsy and traveller accommodation differs from that for other caravans on the coast and this could be viewed as discriminatory.</p>
Strategic Policy 9 – Inland Tourism	2. Protect and enhance the quality and distinctiveness of the area’s landscapes, townscapes and historic environment.	<p>The Inland Tourism policy has spatial criteria for some elements but not others. New tourist attractions and conversion of buildings do not have any locational element and so could be located in the open countryside with potential landscape impact. The text to the policy does reinforce the character of the area and there is reference to conversion of buildings being capable of integration into their surroundings.</p>

	<p>7. Improve accessibility to key services, facilities amenities and green infrastructure including the promotion of sustainable modes of access.</p>	<p>Additionally, the inland tourism policy seeks to promote the Lincolnshire Wolds for tourism development. The Wolds landscape was designated for its landscape importance, unlike the National Parks which have a recreational element to them.</p> <p>In both cases, the inland tourism policy should be used in association with Strategic Policy 14 – Landscape, which accords the Lincolnshire Wolds AONB the highest level of protection. The combination of this policy and the references in the tourism policy should protect the Wolds landscape, but this should be monitored to ensure the correct balance is being struck. Similarly, the impact of new tourism development and conversion of buildings should be monitored to assess the success of the policies in balancing economic benefits of tourism with the need to protect the landscapes of the District.</p> <p>Some elements of the policy, economic development, coastal country park and change of use of buildings to holiday accommodation do not have a spatial element. These parts of the policy are therefore not seeking to improve access to services and facilities, or promoting sustainable modes of access in that they, in principle, look positively on development in isolated locations. Although the policy will be used in connection with the</p>
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		<p>transport policy to help offset this, it is not clear why some parts of the policy are spatially specific and others are not. Either the policy should be reworded to address this, or the text of the policy should be supplemented to explain how these non-spatial elements of policy will be judged.</p>
<p>Strategic Policy 11 – Coastal East Lindsey</p>	<p>4. Avoid the risk of flooding (where possible) and fully mitigate against the impacts of flooding where it cannot be avoided.</p> <p>7. Improve accessibility to key services, facilities amenities and green infrastructure including the promotion of sustainable modes of access.</p>	<p>The policy is seeking to achieve the best balance between supporting existing communities in the coastal area and recognising the flood risk issues that exist. A number of mitigation measures are in place in the policy including the use of occupancy conditions to restrict the use holiday chalets and caravans at the most high risk times of the year. However, this occupancy condition has not been extended to the change of use of buildings to holiday lets, or for new hotel and bed and breakfast facilities and this difference in approach should be explained in the text.</p> <p>Some elements of the policy, economic development, coastal country park and change of use of buildings to holiday accommodation do not have a spatial. These parts of the policy are therefore not improving access to services and facilities or promoting sustainable modes of access in that they, in principle, look positively on development in isolated locations. Although the policy will be used in connection with the transport policy to help offset this, it is not clear why some parts of the</p>

		policy are spatially specific and others are not. Either the policy should be reworded to address this, or the text of the policy should be supplemented to explain how these non-spatial elements of policy will be judged.
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5.7 As the plan progresses through the consultation phases, amendments will be needed to policies and further appraisal will be needed at each stage to show how the plan has taken account of the impacts on the objectives.

## Stage B6

### Monitoring

6.1 The final stage required of SA process is monitoring. Monitoring primarily focuses on ensuring that the Plan is reaching the objectives it has set itself. However, regulations regarding Sustainability Appraisal also require that monitoring is put in place, through the SA, to look at the wider impacts of the Plan on the sustainability objectives.

6.2 Guidance on the SA says that information and indicators can be drawn from existing sources to avoid unnecessary duplication for example, the Annual Monitoring Report produced by the Council. It suggests that monitoring measure may include; objectives and targets developed for the SA; features of the baseline that will indicate the effects of the Plan; likely significant effects identified during the assessment; and the mitigation measures proposed to offset the effects. Guidance on SEA stated that significant environmental effects of a plan must be monitored.

6.3 Monitoring has to be manageable, or it will risk being difficult to complete and hard to assimilate, and it has to be meaningful otherwise it will be monitoring for its own sake. Similarly, indicators should not be subjective, but should be clearly measurable.

6.4 The 2009 SA identified 56 indicators and 46 targets, which represents a large amount of data to be collected. Some of the data is not collected by the Council, so the Council has no control over its long term collection or accessibility, and others data sets are measuring matters that cannot be directly attributed to the impact of the Core Strategy. It is indeed to hone these down to establish a slimmer set of indicators and targets that better link the Core Strategy and the Sustainability Objectives.

6.5 Appendix 3 sets out indicators for those Sustainability Objectives which link most strongly with the Plan's own objectives and potential impacts; and which are measurable. There new series of indicators and targets contains ?? indicators and ?? targets. A range have been selected that best reflect the links between the Sustainability Objectives and the Core Strategy. Some of the indicators have been repeated, as they apply to more than one objective, this will help to simplify the monitoring process. Guidance states that predicted significant effects of the plan should be monitored; only one significant negative effect has been identified, however, it is felt that some of the uncertain effects of the plan would benefit from monitoring to better identify their impacts as the plan is put into practise. The most difficult of these to monitor in statistical terms is the impact on landscape character. Measuring landscape quality and landscape impact is a specialist area, more descriptive in nature, and it cannot easily be honed down to a few tidy statistics. To be meaningful, this issue will have to be monitored in a more narrative style. The indicators stemming from these identified issues have been marked with an asterisk in the table in appendix 3.



## **Next Steps**

7.1 The SA report will be part of the consultation alongside the draft Core Strategy. Consultation responses received on the SA will be considered to see how they can help shape the SA and therefore the plan.

7.2 Consultation responses on the Core Strategy will be used by the Council to help amend the policies prior to further consultation. If any resulting changes are minor, then a further SA will not be needed. However, if there are any significant changes or new policies emerging from the consultation, then the SA will need to be revised in respect of both the amended policies and any policies they may work in conjunction with.