APPENDIX 2A

Cheshire East Local Plan



Revised
Publication Draft
SADPD
Sustainability

Appraisal
Non-technical
Summary

August 2020





[Page left blank for printing]



1	Introduction	2
2	Scope of the SA	4
3	SA of alternatives	6
	Introduction	6
	Initial disaggregation Options	6
	Revised disaggregation Options	13
	Initial safeguarded land Options	18
	Revised safeguarded land Options	24
	Site options	28
4	SA of the Draft Plan	32
5	Cumulative effects	38
	Introduction	38
	Significant positive cumulative effects of the SADPD (intra-plan effects)	38
	Significant negative or uncertain cumulative effects of the SADPD (intra-plan effects)	39
	Interactions with other relevant plans and projects (inter-plan effects)	39
	Conclusion	41
6	Next steps	42



1 Introduction

Background

- 1.1 Cheshire East Council ("CEC") is undertaking a Sustainability Appraisal ("SA") in support of the emerging Site Allocations and Development Policies Document ("SADPD"). SA of Local Plans is a legal requirement; Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out SA for a Local Plan during its preparation.
- **1.2** SA is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. (1) The National Planning Policy Framework (2019) ("NPPF") identifies the SA process as an integral part of plan-making and should consider all likely significant effects on the environment, economic and social factors.

Purpose and priorities of the SADPD

- The Council is committed to putting in place a comprehensive set of up-to-date planning policies to support our ambition of making the Borough an even greater place to live, work and visit. The first part of the Council's Local Plan, the Local Plan Strategy ("LPS"), was adopted at Council on 27 July 2017. The SADPD will form the second part of the Council's Local Plan. Work on the SADPD started in the fourth guarter of 2016 and included the publication of an Issues Paper for consultation between 27 February 2017 and 10 April 2017. This provided an opportunity for consultees to tell the Council what they thought it should contain and the direction its policies should take. Published alongside this, also for consultation, was a revised SA Scoping Report. The Council also carried out a 'call for sites' to inform the allocation of development sites, which ran between 27 February and 1 July 2017. The First Draft SADPD was published for consultation between 11 September and 22 October 2018, and was accompanied by an Interim SA Report, also for consultation. Consultation on the initial Publication Draft SADPD and its accompanying SA Report took place between 19 August and 30 September 2019. A number of significant proposed changes have been made to the initial Publication Draft SADPD following careful consideration of representations received in 2019 and reflect updated evidence and circumstances regarding the Plan. This has led to the Revised Publication Draft SADPD.
- **1.4** Once adopted the SADPD, along with the LPS, will set out the proposed strategy for meeting the Borough's needs to 2030 and replace the former District Local Plans of Congleton, Crewe and Nantwich, and Macclesfield.
- 1.5 The SADPD will:
- 1. Allocate additional sites for development, where necessary. These will generally be 'non-strategic' sites, which means sites of less than 150 homes or 5 hectares in size. The additional allocations will assist in meeting the overall indicative development

¹ National Planning Practice Guidance ("NPPG"): Strategic environmental assessment and sustainability appraisal.



- requirements for the Borough set out in the LPS. These allocations will be for housing, employment, Gypsy and Travellers and Travelling Showpeople.
- 2. Set out more detailed policies to guide planning application decisions in the Borough. Policy boundaries will be reviewed or established around towns and villages to guide the location of new development at a local level, and around town centres to support investment in them. Land that needs particular protection will be designated, for example, because of its significance to biodiversity or the historic environment.
- **1.6** The priorities for the SADPD are carried forward from those in the LPS, which identifies a Vision and four Strategic Priorities to deliver it:
- Strategic Priority 1 Promoting economic prosperity by creating conditions for business growth
- Strategic Priority 2 Creating sustainable communities, where all members are able to contribute and where all the infrastructure required to support the community is provided
- Strategic Priority 3 Protecting and enhancing environmental quality
- Strategic Priority 4 Reducing the need to travel, managing car use and promoting more sustainable modes of transport and improving the road network
- 1.7 These Strategic Priorities are overarching and are carried through to the SADPD.

Purpose and structure of the SA Report

- 1.8 The legally required SA Report has been produced and is published alongside the Revised Publication Draft SADPD, under Regulation 19 of the Local Planning Regulations, to demonstrate that the SA process has formed an integral part of plan-making. It sets out the method and findings of the SA at this stage, including the consideration of any reasonable alternatives.
- **1.9** Following this introductory Chapter the Report is structured as follows:
- Chapter 2 sets out the scope of the SA, including key issues and SA objectives
- Chapter 3 sets out how reasonable alternatives have been identified, the findings of the alternatives appraisal and the reasons for selecting the preferred approach
- Chapter 4 sets out the findings of the appraisal of the Revised Publication Draft SADPD at this stage
- Chapter 5 sets out the cumulative effects of the Revised Publication Draft SADPD
- Chapter 6 sets out the next steps and initial thoughts on monitoring
- **1.10** Documents referenced with the 'ED' prefix are available to view in the Revised Publication Draft SADPD consultation library.



2 Scope of the SA

- **2.1** The scope of the SA is shown through a list of sustainability objectives established through SA scoping to provide a methodological framework for appraisal. The objectives fall under nine SA topics determined through the baseline review, policy context, key sustainability issues, and consultation, which are:
- Biodiversity, flora and fauna
- Population and human health
- Water and soil
- Air
- Climatic factors
- Transport
- Cultural heritage and landscape
- Social inclusiveness
- Economic development

It should be noted that the objectives have been refined to better reflect the key issues for the Borough and are set out in Table 2.1 of this Report. Any additions are illustrated as <u>orange</u> <u>and underlined</u>, with deletions marked as <u>orange and strikethrough</u>.

Table 2.1 Sustainability Topics and Objectives

Topics	Sustainability Objectives
Biodiversity, flora and fauna	Protect, maintain and enhance biodiversity, habitats, soils, species, geodiversity and important geological features; particularly those that are designated.
Population and human health	Create an environment that promotes healthy and active lifestyles, and reduce inequalities in health.
пеаш	Meet the health and social care needs of an ageing population.
	Create a safe environment and reduce levels of and the fear of crime.
Water and soil	Positively address the issues of water quality and quantity, and manage flood risk in the Borough.
	Achieve sustainable waste management through adhering to the principles of the Waste Hierarchy.
	Manage sustainable mineral extraction, and encourage their recycling/re-use, to provide a sufficient supply to meet social and economic needs, whilst minimising impacts on the environment and communities and safeguarding resources for future generations.
	Reduce the consumption of natural resources, protect and enhance green infrastructure and high quality agricultural land, and optimise the re-use of previously developed land, buildings and infrastructure.
Air	Manage the impacts of development and associated activities to positively address all forms of air pollution.



Topics	Sustainability Objectives
	Make sure that air quality improves and falls below objective limits.
Climatic	To adapt to and mitigate the impacts of climate change.
factors	Minimise energy use, promote energy efficiency and high quality design, and increase the generation of energy from by decentralised and/or renewable resources.
	Encourage the use of sustainable transport.
Transport	Create sustainable communities that benefit from good access to jobs, services, facilities and sustainable forms of transport, including walking, cycling and public transport.
	Reduce reliance on private transport.
Cultural heritage and	Conserve and enhance the area's heritage (including its setting), landscape character, and townscapes; particularly those that are designated.
landscape	Protect, enhance and provide green infrastructure.
Social inclusiveness	Provide an appropriate quantity and quality of housing to meet the needs of the Borough. This should include a mix of housing types, tenures and affordability.
	Consider the needs of all sections of the community in order to achieve high levels of equality, diversity and social inclusion.
	Maintain and/or create vibrant rural communities.
	Create a safe environment to live in and reduce fear of crime.
	Maintain and enhance community services and amenities to sustain the existing and future community of the Borough.
	Address levels of deprivation by improving Improve access to education and training, and the links between these resources and employment opportunities.
Economic development	To promote a sustainable, competitive and low-carbon economy that benefits from a range of innovative and diverse businesses in both urban and rural areas.
	To maintain and enhance the vitality and viability of town and village centres with a balanced provision of retail, leisure, visitor and cultural facilities.
	Positively manage the Borough's diverse rural economy.
	Increase the supply of labour through improving access to job opportunities.



3 SA of alternatives

Introduction

- **3.1** Chapter 3 of the SA Report explains the work undertaken to date to develop reasonable alternatives for the emerging SADPD, focusing on the following elements:
- the approach to housing and employment development at the Local Service Centres ("LSCs")
- the distribution of safeguarded land around inset LSCs in the north of the Borough
- the consideration of site options, using a detailed site selection process to identify candidate sites for development (including safeguarded land) in the SADPD on a settlement-by-settlement basis.
- 3.2 Consultation on the initial Publication Draft SADPD and its accompanying SA Report took place between 19 August and 30 September 2019. A number of significant proposed changes have been made to the initial version following careful consideration of representations received in 2019 and to reflect updated evidence and circumstances regarding the Plan. This has led to the Revised Publication Draft SADPD. References to the initial Publication Draft SADPD (or initial options in relation to disaggregation) refers to the consultation that took place in 2019. References to the Revised Publication Draft SADPD (or revised options) relates to the Revised Publication Draft SADPD.

Initial disaggregation Options

Developing the reasonable alternatives

- 3.3 LPS Policy PG 7 "Spatial Distribution of Development" in the LPS indicates that LSCs are to accommodate in the order of 7 hectares of employment land and 3,500 new homes, with Other Settlements and Rural Areas ("OSRA") indicatively expected to accommodate in the order of 69 hectares of employment land (including 61ha at the Employment Improvement Area at Wardle) and 2,950 new homes (including 275 homes at the Alderley Park Opportunity Site). These figures are neither a ceiling not target to be reached.
- **3.4** The SADPD (part 2 of the Local Plan) was to consider the disaggregation of the PG 7 indicative development figure for LSCs; the Council has explored alternatives to deliver this level of growth.
- 3.5 In terms of the OSRA the strategy of the LPS is to meet the majority of new development in the higher order centres in the settlement hierarchy. Development in the OSRA should be appropriate to the function and character of the settlement and confined to locations that well relate to the settlement's existing built up area.
- 3.6 Several factors were considered to influence the initial disaggregation of the spatial distribution around the LSCs, which led to the development of Policy PG 8 as set out in the initial Publication Draft SADPD. These included: Policy constraints; known development opportunities; infrastructure capacity; physical constraints; deliverability and viability; relationship with achievement of the LPS vision and strategic priorities; and responses to the SADPD Issues Paper and First Draft SADPD consultations. The findings of the SA for the initial disaggregation options also informed the Council's approach.



- **3.7** The methodology was split into stages and sought to clearly set out the process taken to determine the initial disaggregation of the spatial distribution of development around the LSCs, which led to the development of Policy PG 8 as set out in the initial Publication Draft SADPD. The stages were:
- Stage 1 Data gathering
- Stage 2 Consideration of appropriate supply of sites
- Stage 3 Alternative option development
- Stage 4 SA of reasonable alternative options
- Stage 5 Determination of the most appropriate option
- Stage 6 Final report
- **3.8** It was felt appropriate to look at high-level disaggregation options to make sure that all reasonable considerations were taken into account in option development, and that they were related to the issues that face the LSCs in the Borough.
- **3.9** Seven high-level initial Options were identified to help explore the different ways that additional housing and employment land could be distributed around the LSCs. These were:
- Option 1 Population led
- Option 2 Household led
- Option 3 Services and facilities led
- Option 4 Constraints led
- Option 5 Green Belt led
- Option 6 Opportunity led
- Option 7 Hybrid approach
- **3.10** Options 1 and 2 were provided as comparator options to provide a basis from which to compare Options 3 to 7 against. Options 3 to 6 had different focuses of approach (be it services and facilities led, constraints led, Green Belt led, or opportunity led).
- **3.11** The Options for disaggregation needed to take into account the vision and strategic priorities of the LPS, and be achievable. They also should have met the needs of the LSCs, and addressed any issues identified. Table 3.1 explains in further detail the seven high-level Options that were subject to testing.
- 3.12 The NPPF (¶20) notes that it is the role of strategic policies to set out the overall strategy for the pattern, scale and quality of development and make sufficient provision for housing amongst other matters. ¶60 of the NPPF states that strategic policies should be informed by a local housing need assessment, conducted using the standard method. The SADPD is a non strategic plan looking to deliver the principles set by the LPS, a strategic document. The LPS was adopted in July 2017 and hence a review or update of it has not started. Therefore, alternative calculations of overall local housing need, conducted using the standard method are not considered to be a reasonable alternative for the purposes of the Revised Publication Draft SADPD.



Table 3.1 High-level initial Options subject to testing (initial Publication Draft SADPD

Option	Description	Reasoning
1: Population led	This alternative would distribute housing and employment land proportionately according to the population share of each settlement.	There are constraining factors and policy drivers that have not been factored into this alternative, for example landscape designations, Green Belt, and the historic environment. The amount of housing and employment land at each settlement has been calculated by finding the share of the population total for each LSC at 2017, (to provide the most up to date picture, using 2012-2017 mid-year population estimates for small areas from the Office for National Statistics ("ONS")), and then using this proportion to calculate the number of dwellings and employment land from the LSC requirement. It therefore takes a very narrow approach towards determining the rates of growth for each settlement, and the housing and employment floorspace requirements. This Option provides a comparator for Options 3, 4, 5, 6 and 7.
2: Household led	This alternative would distribute housing and employment land proportionately according to the share of housing at each settlement at the beginning of the Plan period.	There are constraining factors and policy drivers that have not been factored into this alternative, for example landscape designations, Green Belt, and the historic environment. The amount of housing and employment land at each settlement has been calculated by finding the share of the household total for each LSC at 2011 (using Census data), and then using this proportion to calculate the number of dwellings and employment land from the LSC requirement. 2011 Census data is the closest estimate to the beginning of the Plan period (01/04/10). Similar to Option 1, it takes a very narrow approach towards determining the rates of growth for each settlement, and the housing and employment floorspace requirements. This Option provides a comparator for Options 3, 4, 5, 6 and 7.
3: Services and facilities led	This alternative would distribute housing and employment land proportionally according to the share of services and facilities in each settlement.	There are constraining factors and policy drivers that have not been factored into this alternative, for example landscape designations, Green Belt, and the historic environment. The amount of housing and employment land at each settlement has been calculated by finding the share of the services and facilities for each LSC, and then using this proportion to calculate the number of dwellings and employment land from the LSC requirement. The services and facilities for each settlement were noted on a template that was adapted from the Determining the Settlement Hierarchy paper to make it more appropriate for the LSCs. This Option assumes that the larger the proportion of services and facilities a settlement has, the more development it could accommodate.

^{2 &}lt;a href="https://www.cheshireeast.gov.uk/planning/spatial_planning/research_and_evidence/settlement_hierarchy_study.aspx">https://www.cheshireeast.gov.uk/planning/spatial_planning/research_and_evidence/settlement_hierarchy_study.aspx



Option	Description	Reasoning
4: Constraints led	This alternative would distribute housing and employment land proportionally according to the share of constraints for each settlement.	The amount of housing and employment land at each settlement has been calculated by finding the share of the constraints for each LSC, and then using this proportion to calculate the number of dwellings and employment land from the LSC requirement. The constraints considered were Green Belt/Strategic Green Gap, Local Landscape Designation Areas ("LLDAs"), nature conservation, historic environment, flood risk, and Best and Most Versatile ("BMV") agricultural land. This Option assumes that if a settlement has fewer constraints then it has the potential to accommodate a greater level of development.
5: Green Belt led	This alternative would seek to limit the impacts of development on settlements that are constrained by the presence of Green Belt around them.	There are other constraining factors and policy drivers that have not been factored into this alternative, for example the historic environment and agricultural land quality. This Option looks to make no further changes to the Green Belt in the north of the Borough around LSCs. Therefore for those settlements constrained by Green Belt, the amount of housing and employment land is calculated by adding together the existing completions, take-up, commitments, and the amount of development that could be accommodated on sites submitted through the Council's call for sites process and the First Draft SADPD consultation that are in the urban area and have been shortlisted for further consideration in the site selection process (Stage 2 of the Site Selection Methodology ("SSM")). For those settlements outside of the Green Belt, the housing and employment land has been calculated by finding the share of the household total for each non-Green Belt LSC at 2011 (using Census data), and then using this proportion to calculate the number of dwellings and employment land from the LSC requirement. 2011 Census data is the closest estimate to the beginning of the Plan period (01/04/10).
6: Opportunity led	This alternative would distribute housing and employment land proportionally according to the share of sites shortlisted for further consideration in the site selection process (Stage 2 of the SSM) for each settlement.	There are constraining factors and policy drivers that have not been factored into this alternative, for example landscape designations, Green Belt, and the historic environment. The amount of housing and employment land at each settlement has been calculated by finding the share of the sites shortlisted for further consideration in the site selection process for each LSC, and then using this proportion to calculate the number of dwellings and employment land from the LSC requirement. This Option assumes that the larger the proportion of sites shortlisted for consideration a settlement has, the more development it would accommodate.
7: Hybrid approach	This alternative represents a balanced approach that considers a range of factors - constraints, services and facilities, and opportunities.	The distribution of further housing and employment land would be based on a consideration of development opportunities, constraints, services and facilities and NDPs. It involves professional judgement and makes sure that all of the relevant factors are properly considered across all the LSCs in determining a justified spatial distribution.



Option	Description	Reasoning
	This option is a blend of Options 3, 4, 5, and 6 with account taken of NDPs, and completions, commitments and take-up.	This Option combines Options 3, 4, 5, and 6 and takes into account the Borough's vision and objectives stated in the LPS, new evidence on development opportunities taken from a call for sites carried out between 27 February and 10 April 2017 and the First Draft SADPD consultation, any housing or employment figures for new development in NDPs, and housing and employment completions, take-up and commitments as at 31/03/18.

Appraising the reasonable alternatives

3.13 Summary appraisal findings are presented in Table 3.2. The appraisal seeks to categorise the performance of each option against the sustainability topics in terms of 'significant effects' (using red or green shading) and also rank the alternatives in relative order of performance. Where it is not possible to differentiate between all alternatives, '=' is used.

Table 3.2 Summary findings of initial high-level disaggregation Options (initial Publication Draft SADPD)

	Option 1 Population led	Option 2 Household led	Option 3 Services/facilities led	Option 4 Constraints led	Option 5 Green Belt led	Option 6 Opportunity led	Option 7 Hybrid approach
Biodiversity, flora and fauna	3	3	3	1	3	3	2
Population and human health	2	2	1	3	2	2	2
Water and soil	3	3	3	1	3	3	2
Air	3	3	1	3	3	3	2
Climatic factors	=	=	=	=	=	=	=
Transport	3	3	1	3	3	3	2
Cultural heritage and landscape	4	4	4	1	3	4	2
Social inclusiveness	2	2	1	3	2	2	2
Economic development	1	1	2	4	3	3	2

3.14 The appraisal found no significant differences between the initial Options in relation to climatic factors. It also found that all of the Options have the potential to result in the permanent loss of greenfield land and BMV agricultural land.

10



- **3.15** Options 1 and 2 spread development around the Borough resulting in negative effects on water and soil, biodiversity, flora and fauna, air quality, cultural heritage and landscape, and transport; however, mitigation is available through LPS and proposed SADPD policies. Effects were found to be less significant in settlements that had less growth. The Options were found to have a potential positive effect against topics relating to economic development, social inclusiveness, and population and human health, as there may be the potential for a critical mass to be reached in terms of infrastructure provision.
- **3.16** Option 3 spreads development around the Borough in relation to the proportion of services and facilities that a settlement has. This could provide the circumstances to reduce the need to travel by private vehicle and take part in active travel, with the potential to improve air quality, reduce inequality, and improve human health for example, with positive effects against topics relating to population and human health, air quality, transport, social inclusiveness and economic development. However, it does result in negative effects on water and soil, biodiversity, flora and fauna, and cultural heritage and landscape, particularly for those settlements that have more services and facilities; however, mitigation is available through LPS and proposed SADPD policies.
- **3.17** Option 4 constrains development in those settlements that have BMV agricultural land, heritage assets, Green Belt, Strategic Green Gap, nature conservation/landscape designations, and flood risk, resulting in negative effects on biodiversity, flora and fauna, water and soil, transport, and cultural heritage and landscape, but to a lesser extent than the other Options under consideration. Mitigation is available through LPS and proposed SADPD policies. This Option has the potential for a negative effect against the topic relating to economic development. This is because this Option restricts growth in areas that could provide a pleasant environment for businesses, which could influence investment decisions, as it takes into account the historic environment and landscape constraints.
- **3.18** Option 5 restricts development in those settlements surrounded by Green Belt, directing development to settlements in the south of the Borough, resulting in a negative effect on air quality, transport, biodiversity, flora and fauna, cultural heritage and landscape, and water and soil at those settlements not constrained by Green Belt. Mitigation is available through LPS and proposed SADPD policies. There was a greater positive effect on settlements in the south of the Borough in relation to economic development. This Option has potential for a positive effect against topics relating to population and human health, and social inclusiveness as there may be the potential for a critical mass to be reached in terms of infrastructure provision, which could help to reduce inequality and improve human health.
- **3.19** Option 6 spreads development around the Borough in relation to development opportunities, resulting in negative effects on water and soil, biodiversity, flora and fauna, cultural heritage and landscape, air quality, transport, and economic development, particularly for those settlements that have more development opportunities; however, mitigation is available through LPS and proposed SADPD policies. This Option could have a positive effect against topics relating to population and human health, and social inclusiveness as there may be the potential for a critical mass to be reached in terms of infrastructure provision, which could help to reduce inequality and improve human health.
- **3.20** Option 7 is a hybrid approach that considers a range of factors (constraints, services and facilities, and opportunities). It does result in a negative effect for water and soil, biodiversity, flora and fauna, cultural heritage and landscape, air quality and transport, although



to a lesser extent than other Options under consideration. Taking into consideration the performance of the other Options, this Option was found to perform well. This is because it makes best use of those LSCs with existing services and facilities, but takes into account any constraints that the settlements face.

3.21 In conclusion, the appraisal found that there are differences between the Options, with a variance as to how the growth is distributed; however, none of the Options are likely to have a significant negative effect given the scale of growth. There were no significant differences between Options 1 and 2. Although Option 3 was the best performing under four sustainability topics, Option 7 performs well across the majority of topics. While there are likely to be differences between the Options in terms of the significance of effects for individual settlements, there is unlikely to be overall significant effects when considered at a strategic plan level. If an Option proposes more growth in a particular LSC compared to the other Options then it is likely to have an enhanced positive effect for that settlement against topics relating to population and human health, social inclusiveness (if a critical mass is reached) and economic development. Conversely, it is also more likely to have negative effects on the natural environment in that area, which includes designated sites. Mitigation provided through Local Plan Policies and available at the project level should make sure that there are no major negative effects. Ultimately the nature and significance of effects against the majority of topics will be dependent on the precise location of development. It is also worth reiterating that the overall indicative level of growth to be delivered at the LSCs (3,500 dwellings and 7 ha of employment land) is set out in the LPS; the SA for the LPS evaluated the potential effects of that growth, although there were uncertainties as the precise location of development was not known.

Reasons for selecting the preferred approach

3.22 Table 3.3 provides an outline of the reasons for the progression/non-progression of initial options for the LSC disaggregation where relevant. It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence base for supporting the SADPD, the SA findings are not the sole basis for a decision; other factors set out and considered in the LSC Spatial Distribution Disaggregation Report [PUB 05] such as infrastructure, deliverability and viability, policy and physical constraints also played a key role in the decision making process.

Table 3.3 Reasons for progression or non-progression of initial disaggregation Options (initial Publication Draft SADPD)

Options	Reasons for progression or non-progression of the Option in plan-making
Option 1: Population led	This approach has not been progressed as it would not meet the needs of all the LSCs, and it is not considered to be sustainable as no consideration is given to constraints, services and facilities for example.
Option 2: Household led	This approach has not been progressed as it would not meet the needs of all the LSCs, and it is not considered to be sustainable as no consideration is given to constraints, services and facilities for example.
Option 3: Services/facilities led	This approach has not been progressed as it fails to consider other important planning factors and it may not address the development needs of those LSCs that have fewer services and facilities.



Options	Reasons for progression or non-progression of the Option in plan-making
Option 4: Constraints led	This approach has not been progressed as it fails to consider other important planning factors and it may not address the development needs of those LSCs that are heavily constrained.
Option 5: Green Belt led	This approach has not been progressed as it fails to consider other important planning factors and it would not adequately address the development needs of the LSCs in the north of the Borough, leading to unsustainable patterns of development.
Option 6: Opportunity led	This approach has not been progressed as it fails to consider other important planning factors and it may not address the development needs of the LSCs where there are fewer opportunities for development.
Option 7: Hybrid approach	Option 7 (hybrid approach) has been progressed as it makes best use of those LSCs with existing services and facilities, but takes into account any constraints that the settlements face. It also takes account of other material factors and considers NDPs. There is a focus on addressing the needs of the LSCs sustainably .

Revised disaggregation Options

Developing the reasonable alternatives

- **3.23** LPS Policy PG 1 'Overall Development Strategy' establishes the requirement for new housing and employment land in the borough between 2010 and 2030; 36,000 homes and 380 hectares of land for business, general industrial and storage and distribution.
- **3.24** LPS Policy PG 7 'Spatial Distribution of Development' provides indicative levels of development by settlement (for the Principal Towns and Key Service Centres ("KSC")) and by tier in the settlement hierarchy (for LSCs and the OSRA). LPS Policy PG 7 sets out how the development anticipated by LPS Policy PG 1 should be generally distributed to meet the borough-wide housing and employment requirements. The indicative figures in LPS Policy PG 7 are neither ceilings nor targets; in the policy wording for LPS Policy PG 7 the indicative level of development to be accommodated at each settlement/tier is described as 'in the order of' for the relevant figures for employment land and new homes.
- **3.25** A summary of the Council's position in the Revised Publication Draft SADPD is set out in 'The provision of housing and employment land and the approach to spatial distribution' [ED 05] examination document, which forms part of the Revised Publication Draft SADPD evidence base.
- **3.26** For the LSCs, it is considered that the net housing completions during the plan period to 31 March 2020 (2,007 homes), net housing commitments at 31 March 2020 (1,193 homes) and remaining neighbourhood plan allocations (10 homes) mean that 'in the order of' 3,500 new homes can be achieved by 2030, reinforced through the expectation that further small site windfall development will take place in the next 10 years of the plan period. Therefore, it is not necessary to make allocations for new dwellings in LSCs in order to facilitate the level of development planned for this tier of the settlement hierarchy.



- 3.27 As explained in Chapter 7 of [ED 05], the Employment Allocations Review [ED 12] considers each of the existing employment allocations from the saved policies in legacy local plans (the Borough of Crewe & Nantwich Replacement Local Plan 2005, the Congleton Borough Local Plan First Review 2005 and the Macclesfield Borough Local Plan 2004). Where sites are considered appropriate for continued allocation for employment purposes, their allocation will be continued by a new policy in the SADPD. For the LSC tier of the hierarchy, the Employment Allocations Review [ED 12] recommends that one current employment allocation in Bollington (1.57ha) is no longer suitable for continued employment allocation in the SADPD. Therefore, whilst this site currently forms part of the total employment land provision, it will not do so upon adoption of the SADPD as it will effectively be de-allocated. Unlike sites lost to alternative uses, the gross employment land requirements do not include an allowance for the replacement of sites de-allocated for employment purposes.
- **3.28** There is a gap of 2.46ha of employment land between the existing level of provision (once the de-allocated site at Bollington is accounted for) and the planned level of provision (7ha). This amounts to 35.1% of the planned provision and therefore the existing level of provision cannot be said to be 'in the order of' 7ha, consequently there is a need to find further employment land at the LSC tier of the settlement hierarchy.
- **3.29** Whilst LPS Policy PG 7 provides a total indicative level of development for LSCs, it does not provide this on a settlement-by settlement basis at the LSC tier of the hierarchy. LPS ¶8.77 confirms that the figure for LSCs will be further disaggregated in the SADPD and/or neighbourhood plans.
- 3.30 Because the approach to facilitating the overall indicative level of housing development planned for the LSCs has been determined through completions and commitments to be added to by future windfall commitments (rather than through site allocations), it is not considered appropriate to disaggregate the overall LSC housing figure further to individual LSCs, nor is there a requirement to allocate sites for housing development in LSCs. Neighbourhood Plans will still be able to set figures for individual areas should they wish, subject to the basic condition of general conformity with the strategic policies for the area.
- **3.31** For the employment land, the majority of the 7ha indicative provision is addressed through take-up to date and existing commitments. There are very limited sites available for employment use at LSCs that have been put forward for consideration through the site selection methodology. Other than existing commitments and completions, the majority of LSCs have no sites that can be considered for employment use. There is only one site put forward for purely employment use, at Recipharm in Holmes Chapel.
- **3.32** The Recipharm site has been assessed in the Holmes Chapel Settlement Report [ED 33] and is considered to be highly suitable for employment use. There is a lack of available employment sites in the majority of LSCs, and of those that have been put forward, all except the Recipharm site propose an element of employment as part of a wider residential-led scheme. As there is no requirement to allocate sites for housing development in LSCs, the Recipharm site is the only pure employment site available for consideration.



- **3.33** In addition, Holmes Chapel is likely to see by far the highest level of housing development of all the LSCs during the plan period. At 31 March 2020, housing supply in Holmes Chapel was 871 dwellings. By comparison, the LSC with the next highest level of housing completions and commitments is Haslington, with a housing supply of 487 dwellings.
- **3.34** Furthermore, the site will act as an extension to an existing key employment area listed in ¶11.25 of the LPS (referenced by its previous name 'Sanofi Aventis'), making a key contribution to the borough's employment land supply as detailed in ¶¶4.19 to 4.22 of the Holmes Chapel Settlement Report [ED 33].
- **3.35** Rather than attempt to disaggregate the employment provision figure further to individual settlements without suitable sites, it is instead considered more appropriate to allocate the Recipharm site in Holmes Chapel, which, alongside the take-up to 31 March 2020 and existing commitments, will facilitate the overall 7ha of employment land provision in LSCs identified in LPS Policy PG 7.
- **3.36** At the First Draft SADPD and initial Publication Draft SADPD stages, seven high-level options were prepared and considered as reasonable alternatives through the relevant SA. Of the initial seven options, Option 7 'Hybrid approach', was seen as the preferred option and was progressed in the First Draft SADPD and then the Initial Publication Draft SADPD. Options 1 to 6 were not progressed, with the reasons for this set out in Table 3.4 of this SA, and, as a result, are not considered as reasonable alternatives for the Revised Publication Draft SADPD.
- **3.37** The new approach to disaggregation highlighted in ¶3.26 and ¶3.35, herein known as Option 8 'Application led' due to it's reliance on future windfall commitments for housing (determined through the planning application process) to help facilitate the overall indicative level of housing development planned for the LSCs, is therefore appraised alongside Option 7 'Hybrid approach' in this SA.
- 3.38 The NPPF (¶20) notes that it is the role of strategic policies to set out the overall strategy for the pattern, scale and quality of development and make sufficient provision for housing amongst other matters. ¶60 of the NPPF states that strategic policies should be informed by a local housing need assessment, conducted using the standard method. The SADPD is a non-strategic plan looking to deliver the principles set by the LPS, a strategic document. The LPS was adopted in July 2017 and hence a review or update of it has not started. Therefore, alternative calculations of overall local housing need, conducted using the standard method are not considered to be a reasonable alternative for the purposes of the Revised Publication Draft SADPD.
- 3.39 Table 3.4 explains in further detail the two high-level Options that are subject to testing.



Table 3.4 Revised disaggregation Options subject to testing

Option	Description	Reasoning
7: Hybrid approach	This alternative represents a balanced approach that considers a range of factors - constraints, services and facilities, and opportunities. This option is a blend of Options 3, 4, 5 and 6, with account taken of NDP's, completions, commitments and take-up.	The distribution of further housing and employment land would be based on a consideration of development opportunities, constraints, services and facilities and NDPs. It involves professional judgement and makes sure that all of the relevant factors are properly considered across all the LSCs in determining a justified spatial distribution. This Option combines Options 3, 4, 5 and 6 and takes into account the Borough's vision and objectives stated in the LPS, new evidence on development opportunities taken from a call for sites carried out between 27 February and 10 April 2017 and the First Draft SADPD consultation, any housing or employment figures for new development in NDPs, and housing and employment completions, take-up and commitments as at 31/3/20.
8: Application led	This alternative takes into account completions, commitments and take-up for housing and employment.	The distribution of further housing and employment land would be based on policies in the development plan, which would take into consideration landscape designations, Green Belt and the historic environment for example, with the aim of achieving sustainable development. This Option takes into account housing and employment completions, take-up and commitments as at 31/3/20. The Option also assumes that future windfall commitments will help to facilitate the overall indicative level of housing development for the LSCs; these windfalls will be determined through the planning application process.

Appraising the reasonable alternatives

3.40 Summary appraisal findings are presented in Table 3.5. The appraisal seeks to categorise the performance of each option against the sustainability topics in terms of 'significant effects' (using red or green shading) and also rank the alternatives in relative order of performance. Where it is not possible to differentiate between all alternatives, '=' is used.

Table 3.5 Summary of appraisal findings: revised disaggregation options

	Option 7	Option 8
Biodiversity, flora and fauna	1	2
Population and human health	1	2
Water and soil	1	2
Air	=	=
Climatic factors	=	=
Transport	=	=
Cultural heritage and landscape	1	2
Social inclusiveness	1	2



	Option 7	Option 8
Economic development	1	2

- **3.41** The appraisal found no significant differences between the Options in relation to air, climatic factors and transport. It also found that all of the Options have the potential to result in the permanent loss of greenfield land and BMV agricultural land.
- **3.42** Option 7 is a hybrid approach that considers a range of factors (constraints, services and facilities, and opportunities). It does result in a negative effect for water and soil, biodiversity, flora and fauna, cultural heritage and landscape, air quality and transport, however mitigation is available through LPS and proposed SADPD policies. This Option was found to perform well as it makes best use of those LSCs with existing services and facilities, but takes into account any constraints that the settlements face.
- **3.43** Option 8 looks to use future windfall commitments to contribute further towards the indicative level of housing development, determined through the planning application process. It does result in a negative effect for water and soil, biodiversity, flora and fauna, cultural heritage and landscape, air quality and transport, however mitigation is available through LPS and proposed SADPD policies. The Policy framework leads applicants to look at constraints on the site for example, as part of the planning balance.
- In conclusion, the appraisal found that there are differences between the Options, with a variance as to how the growth is distributed; however, neither of the Options are likely to have a significant negative effect given the scale of growth. Although Option 7 was the best performing under six sustainability topics, Option 8 also performed well. While there are likely to be differences between the Options in terms of the significance of effects for individual settlements, there is unlikely to be overall significant effects when considered at a strategic plan level. If an Option proposes more growth in a particular LSC compared to the other Option then it is likely to have an enhanced positive effect for that settlement against topics relating to population and human health, social inclusiveness (if a critical mass is reached) and economic development. Conversely, it is also more likely to have negative effects on the natural environment in that area, which includes designated sites. Mitigation provided through Local Plan Policies and available at the project level should make sure that there are no major negative effects. Ultimately the nature and significance of effects against the majority of topics will be dependent on the precise location of development. It is also worth reiterating that the overall level of growth to be delivered at the LSCs is set out in the LPS; the SA for the LPS evaluated the potential effects of that growth, although there were uncertainties as the precise location of development was not known.

Reasons for selecting the preferred approach

3.45 Table 3.6 provides an outline of the reasons for the progression/non-progression of revised options for the LSC disaggregation where relevant. It should be noted that whilst the SA findings are considered by the Council in its selection of options and forms part of the evidence base supporting the Local Plan, the SA findings are not the sole basis for decision making; other factors, set out in 'The provision of housing and employment land and the approach to spatial distribution' [ED 05] have informed the Council's approach to decision making.



Table 3.6 Reasons for the progression or non-progression of revised options in plan-making

Revised option	Reasons for progression or non-progression of the option in plan-making
Option 7: Hybrid approach	This approach has not been progressed as there is no requirement for site allocations (and therefore no exceptional circumstances for Green Belt boundary alterations) and the approach to facilitating the overall indicative level of housing development planned for the LSCs has been determined through completions and commitments. Therefore it is not considered appropriate to disaggregate the overall LSC spatial distribution of housing figure further to individual LSCs.
Option 8: Application led	Option 8 (application led) has been progressed as the current supply of housing at the LSC tier (3,210 dwellings) lies in the order of 3,500 dwellings and it is likely that further housing development through windfall schemes will reinforce this position. There is a reasonable prospect that 'in the order of' 3,500 dwellings will come forward at LSCs by 2030 without making site allocations in LSCs.

Initial safeguarded land Options

Developing the reasonable alternatives

- **3.46** As set out in the NPPF, the government attaches great importance to Green Belts and once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. It is considered that these exceptional circumstances do not extend to Green Belt release of additional land over and above the 200ha that has been fixed through the LPS process. Therefore, the remaining amount of safeguarded land to be distributed to the LSCs inset within the North Cheshire Green Belt is 13.6ha.
- **3.47** The LSCs inset within the North Cheshire Green Belt are: Alderley Edge; Bollington; Chelford; Disley; Mobberley; and Prestbury. All of the other LSCs (Audlem, Bunbury, Goostrey, Haslington, Holmes Chapel, Shavington and Wrenbury) are located beyond the Green Belt.
- **3.48** Whilst the distribution of safeguarded land in the LPS was largely based on the spatial distribution of indicative development requirements in this plan period, this may not be the most appropriate approach for the SADPD to follow. As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], it is now not proposed to disaggregate the limited remaining development requirements for this plan period to individual LSCs.
- **3.49** Several factors are considered to influence the distribution of safeguarded land around the LSCs. These include: policy and physical constraints; neighbourhood planning; future development opportunities; infrastructure capacity; deliverability and viability; relationship with achievement of LPS vision and strategic priorities; and responses to the SADPD Issues Paper, First Draft SADPD and initial Publication Draft SADPD consultations. The findings of the SA for the disaggregation options have also informed the Council's approach.
- **3.50** Eight potential initial options to distribute the safeguarded land to the inset LSCs have been identified in the 'Local Service Centres Safeguarded Land Distribution Report' [ED 53]. These explore the different ways that the safeguarded land could be distributed around the LSCs and are shown in Table 3.7. For the initial Publication Draft SADPD, three options for



the distribution of safeguarded land were identified that were based on the initial preferred option (Option 7) for the LSC spatial distribution of development. However, as the approach to how development is distributed around the LSCs has been revised and a new preferred option identified for the Revised Publication Draft SADPD, the three options identified at the initial Publication Draft stage are no longer considered to be reasonable alternatives. These have therefore not been included in this Report.

Table 3.7 Initial safeguarded land options

Option	Description	Reasoning
1: Development coming forward	This alternative would distribute the safeguarded land proportionately to each LSC, in line with the levels of development coming forward in LSCs in this plan period (2010-2030).	The approach takes the levels of completions and commitments (housing and employment land) for each inset LSC as a proportion of the completions and commitments for all inset LSCs. These proportions are then used to distribute the total 13.6ha safeguarded land. This Option provides a comparator for Options 4 to 8.
2: Population	This alternative would distribute the safeguarded land proportionately to each LSC according to the population share of each settlement, using the latest available population data from the ONS 2018 mid-year population estimates for small areas (October 2019 release).	There are constraining factors and policy drivers that have not been factored into this alternative, for example landscape designations, Green Belt and the historic environment. The approach takes the total population in each settlement as a proportion of the total population in all inset LSCs. These proportions are then used to distribute the total 13.6ha safeguarded land. This Option provides a comparator for Options 4 to 8.
3: Households	This alternative would distribute the safeguarded land proportionately to each LSC according to the population share of each settlement, using data on households from the Census 2011.	There are constraining factors and policy drivers that have not been factored into this alternative, for example landscape designations, Green Belt and the historic environment. The approach takes the number of households in each settlement as a proportion of the total number of households in all inset LSCs. These proportions are then used to distribute the total 13.6ha safeguarded land. This Option provides a comparator for Options 4 to 8.
4: Services and facilities	This alternative would distribute the safeguarded land proportionately to each LSC according to the share of services and facilities in each settlement.	There are constraining factors and policy drivers that have not been factored into this alternative, for example landscape designations, Green Belt and the historic environment. The approach takes the number of facilities and services in each settlement as a proportion of the total number of facilities and services in all inset LSCs. These proportions are then used to distribute the total 13.6ha safeguarded land.



Option	Description	Reasoning
		The services and facilities for each settlement considered were adapted from the 'Determining the Settlement Hierarchy' paper (3) to make it more appropriate for the LSCs.
		The approach assumes that the more services and facilities a settlement has the more safeguarded land it could accommodate.
5: Constraints	This alternative would distribute the safeguarded land proportionately to each LSC according to the share of constraints present in each settlement.	The approach takes the total constraints score for each settlement as a proportion of the total constraints score for all inset LSCs. These proportions are then used to distribute the total 13.6ha safeguarded land.
		The constraints considered were local landscape designations, nature conservation, historic environment, flood risk, and Best and Most Versatile agricultural land.
		The approach assumes that settlements with fewer constraints have the potential to accommodate a greater level of safeguarded land.
6: Green Belt	This alternative would distribute safeguarded land to each LSC in a manner to that minimises the impact on the Green Belt.	The approach considers the outcomes of the Green Belt Assessment Update 2015 ("GBAU") and assumes that settlements surrounded by Green Belt land that makes a lower contribution to the purposes of Green Belt have the potential to accommodate a greater level of safeguarded land.
		The approach takes the Green Belt impact score for each settlement as a proportion of the total Green Belt impact score for all inset LSCs and uses these proportions to distribute the total 13.6ha safeguarded land.
7: Opportunity	This alternative would distribute the safeguarded land proportionately to each LSC according to the level of potential opportunity for development (housing and employment) present	There are constraining factors and policy drivers that have not been factored into this alternative, for example landscape designations, Green Belt and the historic environment.
	in each settlement.	The approach takes the level of potential opportunity in each settlement as a proportion of the total level of potential opportunity for all inset LSCs. These proportions are then used to distribute the total 13.6ha safeguarded land.
		The approach assumes that settlements with greater levels of potential development opportunities have the potential to accommodate a greater level of safeguarded land.
8: Hybrid	This alternative seeks to take account of the factors considered in a number of the different options: services and facilities (Option 4), constraints	The mean average of the apportionments under each of these approaches are calculated by summing up the safeguarded land apportionment for each settlement under each of the four options and then divides this figure by four.

^{3 &}lt;a href="https://www.cheshireeast.gov.uk/planning/spatial_planning/research_and_evidence/settlement_hierarchy_study.aspx">https://www.cheshireeast.gov.uk/planning/spatial_planning/research_and_evidence/settlement_hierarchy_study.aspx



Option	Description	Reasoning
	(Option 5) minimising impact on the Green Belt (Option 6) and opportunities (Option 7).	

Appraising the reasonable alternatives

3.51 Summary appraisal findings are presented in Table 3.8. The appraisal seeks to categorise the performance of each option against the sustainability topics in terms of 'significant effects' (using red or green shading) and also rank the alternatives in relative order of performance. Where it is not possible to differentiate between all alternatives, '=' is used.

Option **Option** Option **Option Option** Option Option Option Biodiversity, flora and fauna Population and human health Water and soil Air Climatic factors Transport Cultural heritage and landscape Social inclusiveness Economic development

Table 3.8 Summary of appraisal findings: initial safeguarded land Options

- **3.52** The appraisal found no significant differences between the Options in relation to climatic factors. It also found that all of the Options have the potential to result in the permanent loss of greenfield land and BMV agricultural land.
- **3.53** Option 1 spreads safeguarded land around the LSCs in relation to the distribution of development coming forwards in this plan period, resulting in negative effects on water and soil, biodiversity, flora and fauna, air quality, cultural heritage and landscape, and transport; however, mitigation is available through LPS and proposed SADPD policies. Effects were found to be less significant in settlements that had less proposed safeguarded land. The Options were found to have a potential positive effect against topics relating to economic development, social inclusiveness, and population and human health, as there may be the potential for a critical mass to be reached in terms of infrastructure provision.
- **3.54** Options 2 and 3 spread safeguarded land around the LSCs in relation to population and household figures, resulting in negative effects on water and soil, biodiversity, flora and fauna, air quality, cultural heritage and landscape, and transport; however, mitigation is available through LPS and proposed SADPD policies. Effects were found to be less significant in settlements that had less proposed safeguarded land. The Options were found to have



- a potential positive effect against topics relating to economic development, social inclusiveness, and population and human health, as there may be the potential for a critical mass to be reached in terms of infrastructure provision.
- **3.55** Option 4 spreads safeguarded land around the LSCs in relation to the proportion of services and facilities that a settlement has. This could provide the circumstances to reduce the need to travel by private vehicle and take part in active travel, with the potential to improve air quality, reduce inequality, and improve human health for example, with positive effects against topics relating to population and human health, air quality, transport, social inclusiveness and economic development. However, it does result in negative effects on water and soil, biodiversity, flora and fauna, and cultural heritage and landscape, particularly for those settlements that have more services and facilities; however mitigation is available through LPS and proposed SADPD policies.
- 3.56 Option 5 constrains safeguarded land in those LSCs that have BMV agricultural land, heritage assets, Green Belt, Strategic Green Gap, nature conservation/landscape designations, and flood risk resulting in negative effects on biodiversity, flora and fauna, water and soil, transport, air quality, and cultural heritage and landscape, but to a lesser extent than the other Options under consideration. Mitigation is available through LPS and proposed SADPD policies. This Option has the potential for a negative effect against the topic relating to economic development. This is because this Option restricts future growth in areas that could provide a pleasant environment for businesses, which could influence investment decisions, as it takes into account the historic environment and landscape constraints. This Option has potential for a positive effect against topics relating to population and human health, and social inclusiveness as there may be the potential for a critical mass to be reached in terms of infrastructure provision, which could help to reduce inequality and improve human health.
- **3.57** Option 6 seeks to minimise the impact on the Green Belt, resulting in a negative effect on air quality, transport, biodiversity, flora and fauna, cultural heritage and landscape, and water and soil at those LSCs that make a lower contribution to the purposes of Green Belt. Mitigation is available through LPS and proposed SADPD policies. This Option has potential for a positive effect against topics relating to economic development, population and human health, and social inclusiveness as there may be the potential for a critical mass to be reached in terms of infrastructure provision, which could help to reduce inequality and improve human health.
- **3.58** Option 7 spreads safeguarded land around the LSCs in relation to development opportunities, resulting in negative effects on water and soil, biodiversity, flora and fauna, cultural heritage and landscape, air quality, transport, and economic development, particularly for those settlements that have more development opportunities; however, mitigation is available through LPS and proposed SADPD policies. This Option could have a positive effect against topics relating to population and human health, and social inclusiveness as there may be the potential for a critical mass to be reached in terms of infrastructure provision, which could help to reduce inequality and improve human health.
- **3.59** Option 8 is a hybrid approach that considers a range of factors (constraints, services and facilities, and opportunities). It does result in a negative effect for water and soil, biodiversity, flora and fauna, cultural heritage and landscape, air quality and transport, although to a lesser extent than other Options under consideration. This Option has potential for a



positive effect against topics relating to population and human health, and social inclusiveness as there may be the potential for a critical mass to be reached in terms of infrastructure provision, which could help to reduce inequality and improve human health. Taking into consideration the performance of the other Options, this Option was found to perform well. This is because it makes best use of those LSCs with existing services and facilities, but takes into account any constraints that the settlements face.

- In conclusion, the appraisal found that there are differences between the Options, with a variance as to how the safeguarded land is distributed; however, none of the Options are likely to have a significant negative effect given the amount of safeguarded land proposed. There were no significant differences between Options 1, 2, 3, 6 and 7. Although Option 4 was the best performing under five sustainability topics, Option 8 performs well across the majority of topics. While there are likely to be differences between the Options in terms of the significance of effects for individual settlements, there is unlikely to be overall significant effects when considered at a strategic plan level. If an Option proposes more safeguarded land in a particular LSC compared to the other Options then it is likely to have an enhanced positive effect for that settlement against topics relating to population and human health, social inclusiveness (if a critical mass is reached) and economic development. Conversely, it is also more likely to have negative effects on the natural environment in that area, which includes designated sites. Mitigation provided through Local Plan Policies and available at the project level should make sure that there are no major negative effects. Ultimately the nature and significance of effects against the majority of topics will be dependent on the precise location of development.
- **3.61** It is worth reiterating that there is a level of uncertainty in determining precise effects at this stage as land is safeguarded for future development and it would be for a future Local Plan review (and associated appraisal processes) to determine whether safeguarded land would be allocated and what for.

Reasons for selecting the preferred approach

3.62 Table 3.9 provides an outline of the reasons for the progression/non-progression of initial options for safeguarded land where relevant. It should be noted that whilst the SA findings are considered by the Council in its selection of options and forms part of the evidence base supporting the Local Plan, the SA findings are not the sole basis for decision making; other factors, set out in 'Local Service Centres Safeguarded Land Distribution Report' [ED 53] have informed the Council's approach to decision making.

Table 3.9 Reasons for the progression or non-progression of initial options in plan-making

Option	Reasons for progression or non-progression of the Option in Plan-making
1. In line with the levels of development coming forward in LSCs in this plan period	This approach has not been progressed as it takes a narrow approach to determining the distribution of safeguarded land, which may not lead to sustainable patterns of development in the future.
2. In line with each settlement's usual resident population	This approach has not been progressed as it is not based on an assessment of opportunities, constraints or sustainability factors for each settlement. Overall, this option takes a narrow approach to determining the distribution of safeguarded land, which may not lead to sustainable patterns of development in the future.



Option	Reasons for progression or non-progression of the Option in Plan-making
3. In line with the number of households in each settlement	This approach has not been progressed as it is not based on an assessment of opportunities, constraints or sustainability factors for each settlement. Overall, this option takes a narrow approach to determining the Distribution of safeguarded land, which may not lead to sustainable patterns of development in the future.
4. Services and facilities led	This approach has not been progressed as it does not consider opportunities or constraints present in each settlement.
5. Constraints-led	This approach has not been progressed as it does not consider opportunities or other sustainability factors. It also does not take the constraint posed by Green Belt into account.
6. Minimising impact on the Green Belt	This approach has not been progressed as it does not consider constraints (with the exception of Green Belt), opportunities or sustainability factors.
7. Opportunity led	This approach has not been progressed as it does not consider constraints or sustainability factors. It also does not account for any detailed site assessment work carried out after stage 2 of the site selection methodology, meaning a number of the sites considered could prove to be unsuitable for development following the detailed assessments.
8. Hybrid approach	Option 8 (hybrid approach) has been progressed as it represents a balanced approach that seeks to take account of all relevant planning factors.

Revised safeguarded land Options

Developing the reasonable alternatives

- **3.63** The selection of sites is considered in each of the individual settlement reports, which look to identify sufficient suitable sites to meet each settlement's requirement under the initial preferred option. The relevant settlement reports are:
- Alderley Edge Settlement Report [ED 21]
- Bollington Settlement Report [ED 24]
- Chelford Settlement Report [ED 26]
- Disley Settlement Report [ED 29]
- Mobberley Settlement Report [ED 37]
- Prestbury Settlement Report [ED 40]
- **3.64** These demonstrate that there are sufficient suitable sites available in Alderley Edge, Bollington, Disley and Prestbury to meet the initial safeguarded land distribution for each of those settlements.



- **3.65** There are also sufficient suitable sites in Chelford; however the available sites are significantly larger than Chelford's initial requirement. The sites have been subdivided where possible, but they are still large and the NPPF requirement to define Green Belt boundaries clearly, "using physical features that are readily recognisable and likely to be permanent" means that they cannot be reduced in size further.
- **3.66** In Mobberley, a number of the sites make a major contribution to the purposes of Green Belt and are important in maintaining the separation with Knutsford. There is also the issue of aircraft noise, which is likely to preclude future residential development on a large proportion of the available sites. There are also a number of sites that would not be suitable for future development due to their importance in maintaining the setting of heritage assets.
- **3.67** Once the initial distribution was tested through the settlement reports, it was concluded that Mobberley cannot accommodate any safeguarded land; and Chelford can accommodate 0.58ha (although there are further suitable sites in Chelford that could be identified, but these are larger than its requirement).
- **3.68** Therefore there remains an unmet requirement of 4.13ha (2.16ha in Mobberley and 1.97ha in Chelford). This is due to there being no suitable sites in Mobberley and the remaining suitable sites in Chelford being too large for the remaining Chelford requirement (and not suitable for further subdivision).
- **3.69** At this point further consideration was given as to how the matter could be addressed, which led to the development of four revised Options as shown in Table 3.10.

Table 3.10 Revised safeguarded land options

Option	Description	Reasoning
A: Do not designate the full quantum of safeguarded land	This alternative is effectively a 'do nothing' option, which would leave the unmet requirement as an unmet requirement.	This would mean that the safeguarded land requirements for Alderley Edge, Bollington, Disley and Prestbury would remain the same as in the initial preferred option. However, Chelford's requirement would be reduced to reflect site availability and Mobberley would receive no safeguarded land. This approach would not enable the full 200ha of safeguarded land to be identified, as specified in the LPS. This option is not considered to be a reasonable approach to take as a sufficient degree of permanence may not be given to Green Belt boundaries and the overall safeguarded land requirement for the borough would not be met. As such, this option was not considered further through the sustainability appraisal process.
B: Redistribute Mobberley unmet requirement to Chelford	This alternative would take the unmet requirement from Mobberley and redistribute it to Chelford.	This option recognises that, whilst there are no suitable sites for designation as safeguarded land in Mobberley, there are suitable sites in Chelford (although too large to be designated as safeguarded land given Chelford's apportionment under the initial preferred option). It would mean that the safeguarded land requirements for Alderley Edge, Bollington, Disley and Prestbury would remain the same as in the initial preferred option. Mobberley would receive no safeguarded land, reflecting the lack of available sites and Chelford would receive 4.71ha.



Option	Description	Reasoning
C: Redistribute to the settlement(s) with the most appropriate further site(s) available	This alternative would redistribute the unmet requirement from Mobberley and Chelford to the most appropriate site, following the application of the site selection methodology.	This option would review the settlement reports for Alderley Edge, Bollington, Chelford, Disley and Prestbury to create a list of sites that were considered in the settlement reports but not recommended for identification as safeguarded land to meet the requirements set out under the initial preferred option. The site selection methodology would then be employed across all of these sites (rather than on a settlement-by- settlement basis) to determine which of the sites would be most appropriate for designation as safeguarded land. The unmet requirement would then be redistributed to settlements according to the sites selected.
D: Redistribute proportionately to those settlements that have further suitable sites	Option D(i) would involve the redistribution of Mobberley's unmet safeguarded land requirement to the other inset LSCs of Alderley Edge, Bollington, Chelford, Disley and Prestbury.	Each of the inset LSCs (other than Mobberley) would receive a small increase in their safeguarded land requirement, whilst Mobberley would receive no safeguarded land, reflecting the lack of suitable sites. There are further suitable sites in Chelford, but these were not appropriate under the initial preferred option as there is no scope for further subdivision and designation of a further site would have resulted in a significant over-provision of safeguarded land against the requirement. Therefore, this option is not considered to be a reasonable approach to take as the overall safeguarded land requirement for the borough would either not be met, or would be exceeded. As such, this option was not considered further through the sustainability appraisal process.
	Option D(ii) would redistribute Mobberley's and Chelford's unmet safeguarded land requirement to the other inset LSCs of Alderley Edge, Bollington, Disley and Prestbury.	The approach under option D(ii) takes the amount of safeguarded land proposed in each of Alderley Edge, Bollington, Chelford, Disley and Prestbury as a proportion of the total amount of safeguarded land proposed in those settlements under the initial preferred option. These proportions are then used to redistribute the 4.13ha unmet requirement from Chelford and Mobberley. Under this approach, Chelford would retain 0.58ha safeguarded land in the revised distribution, recognising that a suitable site can be found to accommodate this level of safeguarded land.

Appraising the reasonable alternatives

3.70 Summary appraisal findings are presented in Table 3.11. The appraisal seeks to categorise the performance of each option against the sustainability topics in terms of 'significant effects' (using red or green shading) and also rank the alternatives in relative order of performance. Where it is not possible to differentiate between all alternatives, '=' is used.



Table 3.11 Summary of appraisal findings: revised safeguarded land Options

	Option B	Option C	Option D(ii)
Biodiversity, flora and fauna	1	1	2
Population and human health	=	=	=
Water and soil	1	1	2
Air	1	1	2
Climatic factors	=	=	=
Transport	1	1	2
Cultural heritage and landscape	=	=	=
Social inclusiveness	=	=	=
Economic development	=	=	=

- **3.71** In conclusion, the appraisal found that at a strategic level it is difficult to point to any significant differences between the Options in terms of the overall nature and significance of effects. This is due, in part, to the level of uncertainty in determining precise effects at this stage as land is safeguarded for future development and it would be for a future Local Plan review (and associated appraisal processes) to determine whether safeguarded land would be allocated and what for. However, notably, the appraisal identified that Options B (redistribute Mobberley unmet requirement to Chelford) and C (redistribute to the settlements with the most appropriate further sites available), both of which have the same distribution, performed better in the appraisal relating to the following topics:
- biodiversity, flora and fauna, as Chelford is relatively unconstrained in respect of international, national and local nature conservation designations
- water, as Chelford is surrounded by areas that have less risk of flooding than many of the LSCs
- air, as Chelford does not have an AQMA whereas Disley does
- transport, as Chelford has a Railway Station, whereas Bollington does not
- **3.72** While there are likely to be differences between the Options in terms of the significance of effects for individual settlements, these are unlikely to be of significance overall when considered at a strategic plan level. Ultimately the nature and significance of effects against the majority of topics will be dependent on the precise nature and location of development.

Reasons for selecting the preferred approach

3.73 Table 3.12 provides an outline of the reasons for the progression/non-progression of revised Options for safeguarded land where relevant. It should be noted that whilst the SA findings are considered by the Council in its selection of options and forms part of the evidence base supporting the Local Plan, the SA findings are not the sole basis for decision making; other factors, set out in 'Local Service Centres Safeguarded Land Distribution Report' [ED 53] have informed the Council's approach to decision making.



Table 3.12 Reasons for the progression or non-progression of revised Options in Plan-making

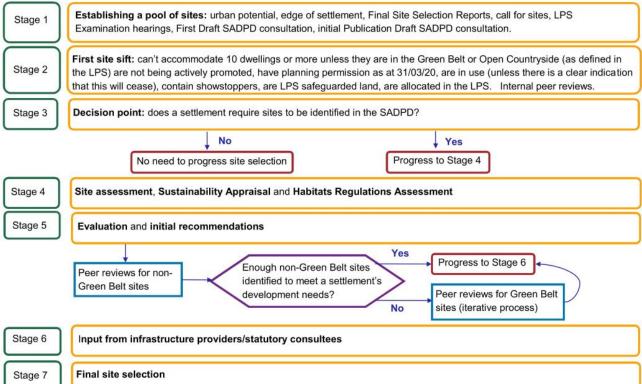
Revised Option	Reasons for progression or non-progression of the Option in Plan-making
B. Redistribute the Mobberley unmet requirement to Chelford.	This approach has been progressed as it allows the overall safeguarded land requirement to be met, enables Chelford to meet its own requirement and provides Mobberley's unmet requirement on the most suitable site available.
C. Redistribute to the settlement(s) with the most appropriate further site(s) available.	This approach has been progressed as it allows the overall safeguarded land requirement to be met, enables Chelford to meet its own requirement and provides Mobberley's unmet requirement on the most suitable site available.
D(ii). Redistribute proportionately to those settlements that have further suitable sites.	This approach has not been progressed as it would require a number of further sites to be identified in a number of settlements and would not enable Chelford to meet its own requirement.

Site options

Site selection process

- **3.74** The Council used a detailed site selection process ("SSM") to carry out the appraisal of site options to identify candidate sites for development (including safeguarded land) in the SADPD on a settlement-by-settlement basis. This process integrated SA as the criteria used as part of the SSM were in line with the SA framework.
- **3.75** The SSM is comprised of a series of Stages, as shown in Figure 3.1. The first two stages are set out in further detail in $\P\P3.77$ to 3.79 of this Report as these are the stages that have led to the identification of the short list of reasonable site options.





Stage 1: Establishing a pool of sites

- 3.76 This work involved utilising existing sources of information including the results of the 'Assessment of the Urban Potential of the Principal Towns, Key Service Centres and Local Service Centres and Possible Development Sites Adjacent to Those Settlements', sites submitted to the LPS Proposed Changes Version that were not considered to be large enough to be a strategic site (as detailed in the Final Site Selection Reports), and sites submitted through the call for sites process in 2017, the First Draft SADPD consultation in 2018 and the initial Publication Draft SADPD consultation in 2019.
- **3.77** In terms of the call for sites process, local residents, landowners, developers and other stakeholders were invited to put forward sites to the Council that they considered to be suitable and available for future development in the Borough for housing, employment or other development. This exercise ran between 27 February and 1 July 2017. Sites were also submitted to the Council during the consultation on the First Draft SADPD in 2018 and the initial Publication Draft SADPD consultation in 2019.

Stage 2: First site sift

- **3.78** The aim of this Stage was to produce a shortlist of sites for further consideration in the site selection process. This entailed taking the long list of sites from Stage 1 and sifting out any that:
- can't accommodate 10 dwellings or more, unless they are in the Green Belt or open countryside (as defined in the LPS) and are not currently compliant with those policies⁽⁴⁾

If the site is likely to be compliant with Green Belt/Open Countryside policy (for example limited infilling in villages) then it should be screened out to avoid double counting with the small sites windfall allowance of 9 dwellings or fewer in the LPS (¶E.7).



- are not being actively promoted
- have planning permission as at 31/3/20
- are in use (unless there is clear indication that this will cease)
- contain showstoppers (Special Protection Area, Special Area of Conservation, Ramsar, Site of Special Scientific Interest, functional floodplain (flood zone 3b), or historic battlefield)
- are LPS Safeguarded Land
- are an allocated site in the LPS⁽⁵⁾

Appraising the site options

- **3.79** In summary the appraisal employs GIS datasets, site visits, measuring, qualitative analysis and planning judgement to see how each site option relates to various constraint and opportunity features.
- **3.80** Several evidence base documents and assessments have informed the Council's decision-making process to determine the preferred approach to establish and appraise the site options including the LPS, SSM [ED 07], 'The provision of housing and employment land and the approach to spatial distribution' [ED 05], 'Local Service Centres safeguarded land spatial distribution report' [ED 53], SA findings, HRA findings [ED 04], Green Belt Site Assessments ("GBSA"), and Heritage Impact Assessments ("HIAs").
- **3.81** The LPS includes a Vision for the LSCs: "In the Local Service Centres, some modest growth in housing and employment will have taken place to meet locally arising needs and priorities, to reduce the level of out-commuting and to secure their continuing vitality. This may require small scale alterations to the Green Belt in some circumstances". To help meet this Vision, LPS Policy PG 7 "Spatial Distribution of Development" shows the overall indicative housing and employment figure for LSCs; seven initial Options at the initial Publication Draft SADPD stage, and additional 'revised' options at the Revised Publication Draft stage were developed and appraised through SA, with a preferred approach established and appraised through HRA. Options were also developed with regards to the distribution of safeguarded land around the inset LSCs.
- 3.82 The work on the approach to housing and employment development at LSCs ran alongside and fed into part of the work on the SSM. This determined if there was a need to allocate sites in any of the LSCs, taking into account existing completions/take up and commitments (as at 31/3/20) for housing and employment development. The Council used the outcomes of the call for sites process, the First Draft SADPD consultation in 2018 and the initial Publication Draft SADPD consultation in 2019, which formed part of the initial pool of sites and then undertook a 'site sift' for those sites that did not meet detailed requirements. Once a decision had been made to allocate sites, then a traffic light assessment was carried out to help determine what constraints and issues a site had. The assessment covered issues such as ecology, viability, accessibility and flooding for example. Occasionally the traffic light assessment indicated that further work was required on, for example, heritage, which required a HIA to be carried out. The options were also subject to HRA.

⁵ Sites in Strategic Location LPS 1 Central Crewe, and Strategic Location LPS 12 Central Macclesfield were not sifted out if they were being promoted for employment use.



- 3.83 As there are some LSCs that are surrounded by Green Belt, the Council took an iterative approach to the assessment of sites, whereby if it was determined that Green Belt release was needed, sites that have been previously-developed and/or are well-served by public transport were considered first. GBSAs were then carried out to find the contribution that each Green Belt site made to the purposes of the Green Belt. It is worth mentioning that those sites that were subject to a GBSA only became a reasonable alternative once it had been determined that a traffic light form needed to be completed for the site. This was based on the contribution the site made to the purposes of the Green Belt and the residual development requirements of the settlement.
- **3.84** In line with the SSM, site options were appraised using criteria linked to the SA Framework. The findings of this work and the outline reasons for their progression or non-progression are provided in Appendix E of the SA Report.



4 SA of the Draft Plan

Introduction

- **4.1** Chapter 4 of the SA Report presents an appraisal of the Revised Publication Draft SADPD. Appraisal findings are presented under nine SA topic headings (see Table 2.1 of this NTS), broken up into the following headings to give stand alone consideration to the various elements of the Revised Publication Draft SADPD:
- Planning for growth
- General requirements
- Natural environment, climate change and resources
- The historic environment
- Rural issues
- Employment and economy
- Housing
- Town centres and retail
- Transport and infrastructure
- Recreation and community facilities
- Site allocations
- Appraisal of the draft plan as a whole
- **4.2** Each narrative ended in concluding paragraphs, which are repeated here.

Biodiversity, flora and fauna

- **4.3** The proposed policies in the Revised Publication Draft SADPD, along with existing policies in the LPS, offer a high level of protection for designated and non-designated sites of biodiversity importance and look to enhance provision, where possible. The SA for the LPS predicted the likely effects of the overall level of growth to be delivered at the LSCs and in the OSRA. The Revised Publication Draft SADPD allocates a site for employment to meet this need identified in the LPS as well as designates areas of safeguarded land. The Revised Publication Draft SADPD also allocates sites to contribute towards meeting the residual indicative housing figure for KSC's; this indicative figure was identified in the LPS.
- **4.4** The appraisal found that there is the potential for residual long term minor negative effects due to the proposed site allocations/safeguarded land, predominantly as a result of the loss of greenfield land and potential loss and fragmentation of habitats. Policies in the LPS and the Revised Publication Draft SADPD provide sufficient mitigation to make sure that there will not be any residual significant negative effects.
- **4.5** It is recommended that any proposal should seek a net gain for biodiversity, where possible.

Population and human health

4.6 The proposed policies in the Revised Publication Draft SADPD, along with existing policies in the LPS, look to provide opportunities for active transport and offer a high level of protection for areas of green/open space, where possible. The SA for the LPS predicted the



likely effects of the overall level of growth to be delivered at the LSCs and in the OSRA. The Revised Publication Draft SADPD allocates a site for employment to meet this need identified in the LPS as well as designates areas of safeguarded land. The Revised Publication Draft SADPD also allocates sites to contribute towards meeting the residual indicative housing figure for KSC's; this indicative figure was identified in the LPS.

- **4.7** The appraisal found that, generally, there is the potential for residual long term minor positive effects due to the proposed site allocations/safeguarded land, predominantly as a result of the improvements to be made to footway and cycleway provision and the requirement for green/open space as part of any residential development proposals. However, it is noted that there is potential for residual long term minor negative effects in relation to noise. Policies in the LPS and the Revised Publication Draft SADPD provide sufficient mitigation to make sure that there will not be any residual significant negative effects.
- **4.8** It is recommended that any proposal should seek a net gain for green/open space where possible, along with improvements to provide further opportunities for active transport.
- **4.9** A Health Impact Assessment has been carried out for the Revised Publication Draft SADPD (see Appendix H of the SA Report). It found that the Revised Publication Draft SADPD, in conjunction with the LPS, seeks to meet the needs of all socioeconomic and equalities groups through policy. It has a positive impact particularly for older persons, unemployed people, children aged 5 to 12, low income households, families with children, and people with restricted mobility, with any negative impacts mitigated through Policy or the use of planning conditions.

Water and soil

- **4.10** The proposed policies in the Revised Publication Draft SADPD, along with existing policies in the LPS look to reduce the risk of flooding and manage surface water runoff, where possible. They also seek to remediate land contamination and protect water quality. The SA for the LPS predicted the likely effects of the overall level of growth to be delivered at the LSCs and in the OSRA. The Revised Publication Draft SADPD allocates a site for employment to meet this need identified in the LPS as well as designates areas of safeguarded land. The Revised Publication Draft SADPD also allocates sites to contribute towards meeting the residual indicative housing figure for KSC's; this indicative figure was identified in the LPS.
- **4.11** The appraisal found that there is the potential for residual long term minor negative effects due to the proposed site allocations/safeguarded land, predominantly as a result of the loss of greenfield land and long term significant negative effects as a result of the potential sterilisation of mineral resources, should a relevant site be developed without prior extraction of the mineral resource. Policies in the LPS and the Revised Publication Draft SADPD provide sufficient mitigation to make sure that there are unlikely to be any residual significant negative effects. In relation to minerals, this includes the introduction of the need to undertake a MINASS on those proposed sites where mineral resources are likely to be present on site or close (within 250m) to it. It is worth noting that a separate Minerals and Waste Development Plan Document will be produced, which will:
- set out detailed minerals and waste development management policies to guide planning applications in the Borough, excluding those areas in the Peak District National Park Authority



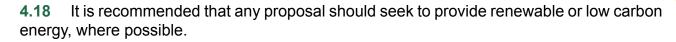
- contain any site allocations necessary to make sure that the requirements for appropriate minerals and waste needs in the Borough are met for the plan period to 2030
- ensure an adequate and steady supply of aggregate
- ensure the prudent, efficient and sustainable use of mineral resources
- introduce appropriate safeguards to ensure the protection of mineral resources, waste sites and their supporting infrastructure from other development
- **4.12** It is recommended that any proposal should seek a reduction in surface water runoff and minimise the risk from flooding, where possible.

Air

- **4.13** The proposed policies in the Revised Publication Draft SADPD, along with existing policies in the LPS, look to provide opportunities for travel by means other than private vehicle, and seek to reduce the need to travel, where possible. The SA for the LPS predicted the likely effects of the overall level of growth to be delivered at the LSCs and in the OSRA. The Revised Publication Draft SADPD allocates a site for employment to meet this need identified in the LPS as well as designates areas of safeguarded land. The Revised Publication Draft SADPD also allocates sites to contribute towards meeting the indicative residual housing figure for KSC's; this indicative figure was identified in the LPS.
- **4.14** The appraisal found that there is the potential for residual long term minor negative effects due to the proposed site allocations/safeguarded land, predominantly as a result of an increase in atmospheric pollution likely to arise as a result of increased traffic through the delivery of housing and employment. Policies in the LPS and the Revised Publication Draft SADPD provide sufficient mitigation to make sure that there will not be any residual significant negative effects, for example through improvements to footway and cycleway provision as part of development proposals.
- **4.15** It is recommended that any proposal should seek to provide further opportunities for active transport.

Climatic factors

- **4.16** The proposed policies in the Revised Publication Draft SADPD, along with existing policies in the LPS, seek to mitigate and adapt to climate change and its impact, where possible. The SA for the LPS predicted the likely effects of the overall level of growth to be delivered at the LSCs and in the OSRA. The Revised Publication Draft SADPD allocate a site for employment to meet this need identified in the LPS as well as designates areas of safeguarded land. The Revised Publication Draft SADPD also allocates sites to contribute towards meeting the residual indicative housing figure for KSC's; this indicative figure was identified in the LPS.
- **4.17** The appraisal found that there is the potential for residual long term minor negative effects due to the proposed site allocations/safeguarded land, predominantly as a result of an increase in built environment related CO₂ emissions likely to arise through the delivery of housing and employment. Policies in the LPS and the Revised Publication Draft SADPD provide sufficient mitigation to make sure that there will not be any residual significant negative effects. It should also be acknowledged that some proposals for various types of renewable energy fall within permitted development rights.





Transport

- **4.19** The proposed policies in the Revised Publication Draft SADPD, along with existing policies in the LPS, seek to provide services, facilities and amenities in appropriate locations around the Borough to provide opportunities for communities to access them, where possible. The SA for the LPS predicted the likely effects of the overall level of growth to be delivered at the LSCs and in the OSRA. The Revised Publication Draft SADPD allocate a site for employment to meet this need identified in the LPS as well as designates areas of safeguarded land. The Revised Publication Draft SADPD also allocates sites to contribute towards meeting the residual indicative housing figure for KSC's; this indicative figure was identified in the LPS.
- **4.20** The appraisal found that there is the potential for residual long term minor positive effects due to the proposed site allocations/safeguarded land, predominantly as a result of allocated proposed sites in locations that are in walking distance of services and facilities. Policies in the LPS and the Revised Publication Draft SADPD provide sufficient mitigation to make sure that there will not be any residual significant negative effects.
- **4.21** It is recommended that any proposal should seek to provide services, facilities and amenities, where possible.

Cultural heritage and landscape

- **4.22** The proposed policies in the Revised Publication Draft SADPD, along with existing policies in the LPS, offer a high level of protection for the Borough's landscape, townscape and historic environment and look to enhance these assets, where possible. The SA for the LPS predicted the likely effects of the overall level of growth to be delivered at the LSCs and in the OSRA. The Revised Publication Draft SADPD allocates a site for employment to meet this need identified in the LPS as well as designates areas of safeguarded land. The Revised Publication Draft SADPD also allocates sites to contribute towards meeting the residual indicative housing figure for KSC's; this indicative figure was identified in the LPS.
- **4.23** The appraisal found that there is the potential for residual long term minor negative effects due to the proposed site allocations/safeguarded land, predominantly as a result of the loss of edge of settlement sites, which will change the historic environment in that area, and potential harm to the setting of heritage assets. Policies in the LPS and the Revised Publication Draft SADPD provide sufficient mitigation to make sure that there will not be any residual significant negative effects.
- **4.24** It is recommended that any proposal should seek to provide landscaping schemes where possible, along with sensitively designed development proposals.
- **4.25** A Rural Proofing Assessment has been carried out for the Revised Publication Draft SADPD (see Appendix I of the SA Report). The Rural Proofing Assessment has highlighted that the Revised Publication Draft SADPD seeks to achieve improvements that will benefit the rural areas of the Borough. It promotes access to and the retention of services, facilities



and infrastructure, and supports economic development through agricultural diversification, for example. The Revised Publication Draft SADPD also promotes the development of homes and looks to provide a high level of protection for the environment.

4.26 The SADPD has no significant negative impact on any of the issues considered. It is therefore thought to provide fair and equitable policy outcomes for the rural areas of the Borough.

Social inclusiveness

- **4.27** The proposed policies in the Revised Publication Draft SADPD, along with existing policies in the LPS, look to achieve high levels of equality, diversity, and social inclusion, where possible. The SA for the LPS predicted the likely effects of the overall level of growth to be delivered at the LSCs and in the OSRA. The Revised Publication Draft SADPD allocates a site for employment to meet this need identified in the LPS as well as designates areas of safeguarded land. The Revised Publication Draft SADPD also allocates sites to contribute towards meeting the residual indicative housing figure for KSC's; this indicative figure was identified in the LPS.
- **4.28** The appraisal found that there is the potential for residual long term minor positive effects due to the proposed site allocations/safeguarded land, predominantly as a result of the provision of housing to meet the needs of all sections of the community. Policies in the LPS and the Revised Publication Draft SADPD provide sufficient mitigation to make sure that there will not be any residual significant negative effects.
- **4.29** It is recommended that any proposal should seek to provide a mix of housing types and tenures, with homes designed to be flexible to meet changing needs.
- **4.30** An Equality Impact Assessment has been carried out for the Revised Publication Draft SADPD (see Appendix G of the SA Report). It found that the SADPD seeks to achieve improvements that will benefit all sections of the community. It promotes accessibility of services, facilities, and jobs and development would incorporate a suitable mix of housing types and tenures. The SADPD has either a positive or neutral impact on all of the protected characteristics considered. It can therefore be described as being compatible with the three main duties of the Equality Act 2010.
- **4.31** A Rural Proofing Assessment was also carried out for the Revised Publication Draft SADPD (see Appendix I of the SA Report). The Rural Proofing Assessment has highlighted that the Revised Publication Draft SADPD seeks to achieve improvements that will benefit the rural areas of the Borough. It promotes access to and the retention of services, facilities and infrastructure, and supports economic development through agricultural diversification, for example. The Revised Publication Draft SADPD also promotes the development of homes and looks to provide a high level of protection for the environment.
- **4.32** The SADPD has no significant negative impact on any of the issues considered. It is therefore thought to provide fair and equitable policy outcomes for the rural areas of the Borough.

Economic development



- **4.33** The proposed policies in the Revised Publication Draft SADPD, along with existing policies in the LPS, look to encourage economic development through the allocation of sites and providing an attractive environment. They also aim to retain a retail function in town centres, where possible. The SA for the LPS predicted the likely effects of the overall level of growth to be delivered at the LSCs and in the OSRA. The Revised Publication Draft SADPD allocates a site for employment to meet this need identified in the LPS as well as designates areas of safeguarded land. The Revised Publication Draft SADPD also allocates sites to contribute towards meeting the residual indicative housing figure for KSC's; this indicative figure was identified in the LPS.
- **4.34** The appraisal found that there is the potential for residual long term significant positive effects due to the proposed site allocations/safeguarded land, predominantly as a result of the provision of employment land to meet the needs of the Borough. Policies in the LPS and the Revised Publication Draft SADPD provide sufficient mitigation to make sure that there will not be any residual significant negative effects.
- **4.35** It is recommended that any proposal should seek to provide attractive surroundings.
- **4.36** A Rural Proofing Assessment was also carried out for the Revised Publication Draft SADPD (see Appendix I of the SA Report). The Rural Proofing Assessment has highlighted that the Revised Publication Draft SADPD seeks to achieve improvements that will benefit the rural areas of the Borough. It promotes access to and the retention of services, facilities and infrastructure, and supports economic development through agricultural diversification, for example. The Revised Publication Draft SADPD also promotes the development of homes and looks to provide a high level of protection for the environment.
- **4.37** The SADPD has no significant negative impact on any of the issues considered. It is therefore thought to provide fair and equitable policy outcomes for the rural areas of the Borough.



5 Cumulative effects

Introduction

- **5.1** In addition to the appraisal of individual policies undertaken in SA/SEA, the SEA Directive requires the consideration of the overall effects of the plan, including the secondary, synergistic and cumulative effects of plan policies. It is important to note that the extant SEA guidance (ODPM, 2005) states that these terms, including secondary or indirect, cumulative and synergistic, are not mutually exclusive. Often the term cumulative effects is taken to include secondary and synergistic effects. This approach examines effects in a holistic way and, for example, considers how incremental effects that may have a small effect individually, may, in some circumstances, accrue to become significant.
- **5.2** Good practice SA/SEA requires that the analysis of cumulative effects consider interactions within/between plan policies (intra-plan effects) as well as the combined effects that may occur with other existing concurrent plans and projects (inter-plan effects). The following sections provide a summary of intra and inter-plan effects, highlighting those that have the potential to be significantly positive and/or negative for the framework of SA objectives set for the plan.
- **5.3** It should be noted that it is not always possible to accurately predict sustainability effects when considering plans at a strategic scale.

Significant positive cumulative effects of the SADPD (intra-plan effects)

5.4 The SA found that the majority of policies and site allocations in the Revised Publication Draft SADPD could have significant positive sustainability benefits for Cheshire East and the wider area. Table 5.1 summarises the significant positive effects identified.

Table 5.1 Significant positive effects of the Revised Publication Draft SADPD

Key relevant SA topic	Positive effects identified
Social inclusiveness	 The plan will have significant long-term positive effects through meeting the housing needs of the Borough, in locations where it is most needed. It will also help to make sure that there is a suitable mix of housing types, tenures and affordability. A significant positive effect on communities through improved access to homes, employment opportunities, community, health, leisure and education facilities and services. A coordinated approach to development will allow homes, jobs and other facilities to be located close to each other and provides the opportunity to reduce reliance on private transport and increase use of public transport. Policies require development to provide opportunities for healthy living, which includes the provision of open space.
Economic development	 A significant positive effect on the economy through policies that support and propose employment development in key settlements, while also seeking to provide employment opportunities for rural areas. Existing employment land is protected and policies support tourist development proposals and town centre uses. A coordinated approach to development will allow homes, jobs and other facilities to be located close to each other and provides the



Key relevant SA topic	Positive effects identified
	opportunity to reduce reliance on private transport and increase use of public transport.

Significant negative or uncertain cumulative effects of the SADPD (intra-plan effects)

5.5 Alongside the many positive effects of the plan, potential negative sustainability effects were also identified, although their effect is uncertain at this stage of the assessment and it is considered likely that these effects can be mitigated at a more detailed planning stage. These are summarised in Table 5.2 below.

Table 5.2 Potentially significant negative effects of the Revised Publication Draft SADPD

Key relevant SA topic	Negative effects identified
Population and human health, water and soil, air, biodiversity, flora and fauna, cultural heritage and landscape, and transport	 The cumulative effects of increased development, including housing, employment development and other infrastructure. These include: increased air pollution (local and regional); direct land-take, loss of good quality greenfield land and soil; pressures on water resources and water quality; increased noise and light pollution, particularly from traffic; increased waste production; loss of tranquillity; implications for human health (for example from increased pollution, particularly in the short term during construction); and incremental effects on landscape and townscapes.
Climatic factors	 An increase in the contribution to greenhouse gas production is inevitable given proposed development, and includes factors such as increased transportation costs, embodied energy in construction materials and increased energy use from new housing and employment development.

Interactions with other relevant plans and projects (inter-plan effects)

- **5.6** Appendix A of the SA Scoping Report (June 2017) identifies a list of related plans, policies and programmes at a national, regional and local level. In considering interactions with other relevant plans and programmes, the Council has identified the key documents that affect planning and development in the Borough and its neighbouring authorities, using Appendix A of the SA Scoping Report as a starting point and focussing on effects at a regional, sub-regional and local level. At a national level, the SADPD has sought to take account and be consistent with the objectives of national guidance, targets and frameworks, where applicable.
- **5.7** It should be noted that a number of documents included in Tables A.2 and A.3 of the SA Scoping Report, such as the 'Cheshire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment', 'Green Infrastructure Framework', Landscape surveys and others, have formed key evidence base documents used to inform the SADPD policies and site allocations.



5.8 The aim of the analysis of inter-plan effects is to identify how other plans and key projects may affect the sustainability of the Borough. Table 5.3 summarises key inter-plan cumulative effects.

Table 5.3 Inter-plan cumulative effects

Plans, programmes or projects	Significant combined effects of Cheshire East's SADPD with other plans, projects and policies
Neighbouring Local Plans (Cheshire West and Chester, Warrington, Manchester, Trafford, Stockport, High Peak, Peak District, Staffordshire Moorlands, Stoke-on-Trent, Newcastle-under-Lyme, Shropshire) including the Greater Manchester Spatial Framework Revised Draft	Positive
	 Proposed housing development, when combined with those in neighbouring authorities, will have a positive cumulative effect in meeting housing demand, particularly for affordable housing. The development of a number of schemes, of a range of sizes, house types and tenures in different locations should address the overall housing need in the borough as well as the wider sub-region. Positive cumulative effects for the economy and employment through the provision of new employment and housing. Positive impact of directing future sustainable development to LSCs should have a positive effect in maintaining and enhancing the vitality of existing settlements and access to services.
	Negative
	 Increased pressures on Green Belt, open/green space and biodiversity assets from recreation, disturbance and direct development. Overall growth in greenhouse gas emissions from growth in traffic/transport and emissions from the built environment. Potential for a negative cumulative effect on air quality and water through increased atmospheric emissions, water abstraction and water pollution (surface water runoff and consented discharges). These effects, along with increased levels of disturbance (recreational activity) have the potential for cumulative negative effects on biodiversity. Increase in coverage of impermeable surfaces, with potential contributions to flood risk in the long term.
Cheshire East Local Transport Plan	Positive
	 Incremental improvements to sustainable transport networks, including walking and cycling. Reduced congestion, improvements to key roads and junctions in the medium and longer term.
	Negative
	 Short term increase in greenhouse gas emissions from growth in the SADPD; the policies in the SADPD and Local Transport Plan should act to reduce this impact.
The Cheshire East	Positive
Sustainable Community Strategy	 Improved delivery of neighbourhood level community services and facilities including extra facility provision. Cumulative benefits for health and equality aims through improvements to access/provision of facilities.



Plans, programmes or projects	Significant combined effects of Cheshire East's SADPD with other plans, projects and policies
	 Enhanced community cohesion through increased availability of affordable homes. Supporting an increasingly older population. Supporting the vitality and viability of towns and villages in the Borough.
Neighbourhood Development Plans	Positive
	 NDPs must be in general conformity with the SADPD. There is the potential therefore for NDPs to contribute to the significant positive and negative cumulative effects identified for the SADPD in Tables 5.1 and 5.2. There is also the potential for NDPs to enhance positive effects as well as reduce the negative effects as they can reflect the local environmental conditions and sustainability issues for that area.
Cheshire East Rights of Way Improvement Plan 2011 - 2026 and Implementation Plan 2015 - 2019	Positive
	 Development proposals contribute positively to the Rights of Way Improvement Plan and Implementation Plan.
	Negative
	 Increased pressure on existing assets from recreation, disturbance and direct development.
Cheshire East Housing Strategy 2018 - 2023	Positive
	 Development proposals/policies supporting a range of sizes, house types and tenures in different locations should address the overall housing need, including for older persons housing.

Conclusion

- 5.9 The overall level of growth to be delivered at the LSCs and in the rural areas was first established in the LPS; the SA for the LPS evaluated the potential effects of this growth, although there were uncertainties as the precise location of development was not known. The Revised Publication Draft SADPD has provided further clarity on the location of non-strategic development. The SA for the Revised Publication Draft SADPD has found that there is the potential for minor residual negative effects as a result of a number of proposed allocations, to meet the target set out in the LPS; however the predicted cumulative effects remain the same or are not predicted to significantly change now that the precise location of development is known.
- **5.10** For many potential cumulative effects, the nature and significance of the cumulative effect is uncertain at this stage. The policy approaches proposed by the Revised Publication Draft SADPD will help reduce the significance of any negative or in-combination effects. Monitoring of the SADPD and SA will make sure that unforeseen adverse environmental effects are highlighted, and remedial action can be taken where needed.



6 Next steps

- 6.1 The Council has prepared a Revised Publication Draft of the SADPD, which is accompanied by this SA Report. This is the version of the SADPD that the Council will submit to the Secretary of State ready for a public examination by an independent Planning Inspector. Once published, and prior to submitting to the Secretary of State, there will be a further six week period to submit formal representations on the soundness of the document. At the end of the representation period, the Council will collate any representations made during the appropriate period and will submit them along with the SADPD and supporting documents to the Secretary of State. The SADPD will then be considered at public examination by an independent Planning Inspector.
- **6.2** The Council may ask the Inspector to recommend additional changes that may be necessary to make the SADPD sound and will need to publish any main modifications for comment before the Inspector completes her/his report.
- **6.3** If the Inspector concludes that the SADPD complies with the Planning and Compulsory Purchase Act and the associated Regulations, and is sound in terms of section 20(5)(b) of the Act and meets the tests of soundness in the NPPF, with or without modifications, then the Council will be able to adopt the SADPD. At the time of adoption an SA Statement will be published that sets out:
- a. how environmental (and sustainability) considerations have been integrated into the Local Plan;
- b. how the SA Report has been taken into account during preparation of the plan;
- c. the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with:
- d. how the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account; and
- e. the measures that are to be taken to monitor the significant effects identified for the Local Plan.

Monitoring

- 6.4 To enable the Council to take a flexible approach to monitoring the significant effects of the Local Plan, a separate Local Plan Monitoring Framework ("LPMF") [ED 54] has been published, which replaces the monitoring framework contained in Table 16.1 of the LPS. This will allow the Council to update and/or amend the LPMF as Local Plan documents are adopted or revised, as well as respond to changes in availability of information sources, whilst continuing to effectively monitor the implementation of the Local Plan.
- 6.5 The LPMF should be read alongside the local plan documents. It explains how achievement of the strategic priorities and policies in the Local Plan will be measured, by assessing performance against a wide range of monitoring indicators including those that monitor significant effects. The results of this assessment will be presented in a yearly Authority Monitoring Report, produced and published by the Council. This process will enable the council to assess whether the Local Plan is being implemented effectively, and will highlight any issues that could prompt revision of the Local Plan.