



Strategic Environmental Assessment Screening Statement for Hot Food Takeaway Supplementary Planning Document (SPD)

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**Planning Policy Group
Kirklees Council
PO Box B93
Civic Centre III
Huddersfield
HD1 2JR**

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1. Introduction

- 1.1 Kirklees Council is in the process of preparing a Supplementary Planning Document (SPD) to provide further detailed guidance to businesses and the local community on how the council will assess applications for new hot food takeaways in partnership with Public health and Environmental health and relevant policies within its Local Plan.
- 1.2 Kirklees Council has prepared a Screening Statement for the Hot Food Takeaway SPD to assess the need to undertake Strategic Environmental Assessment (SEA) of the SPD. The SEA Screening Statement will be consulted on with the relevant Statutory Environmental Bodies.
- 1.3 This SEA Screening Statement has been prepared in accordance with the requirements of Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment and the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.4 The following guidance has also been considered:
 - The National Planning Practice Guidance (PPG ID: 11) in relation to SEA/SA (MHCLG, 2019).
 - A Practical Guide to the Strategic environmental Assessment Directive (ODPM, 2005).
- 1.5 This screening consultation has been prepared to enable the specified Statutory Environmental Bodies (Natural England, Historic England and the Environment Agency) to comment on the appropriateness of the screening process and its conclusion for the proposed SPD.

2. Scope of the Hot Food Takeaway SPD

2.1 The SPD is being prepared to provide greater detail on Local Plan policies relevant to new hot food takeaways. The SPD's primary purpose is to provide to businesses and the local community on how the council will assess applications for new hot food takeaways in partnership with Public health and Environmental health. The SPD will explain how particular Local Plan policies should be interpreted and applied in a Kirklees context.

2.2 The overall purpose of the SPD will be to:

- Supplement the policies within the Local Plan
- Provide further guidance on key considerations for applications within Kirklees
- Outline Kirklees Council's approach with respect to Hot Food Takeaways
- Assist developers in the early development of schemes by identifying the matters for consideration which are likely to be raised within pre-application discussions

3. Structure of the Hot Food Takeaway SPD

3.1 As outlined in Section 2, the purpose of the SPD will be to provide in how the council will assess new hot food takeaway proposals in Kirklees. It will not create any new policy or amend it; however, it will supplement the existing Local Plan policies relevant to new hot food takeaways. In particular the SPD will explain how particular policies should be interpreted in order to ensure that new hot food takeaways are located appropriately within Kirklees District.

3.2 Table 1 sets out the proposed structure of the Hot Food Takeaway SPD. Once produced, a draft of the Hot Food Takeaway SPD will be subject to formal public consultation.

Table 1: Proposed Hot Food Takeaway SPD Structure

Introduction	<ul style="list-style-type: none"> • Purpose: Aims and rationale for the preparation
Background	<ul style="list-style-type: none"> • National context: NPPF and NPPG • National health context • Local Plan objectives: 1, 2 and 5 • Local Plan Policies: LP16 and LP47 • Local context: Our Council Plan, Kirklees Joint Health and Wellbeing Strategy, Healthy Weight Declaration • Local evidence of health context • Other council strategies: Kirklees Food Initiatives and Nutrition Education (FINE) project, Getting It Right First Time (GIRFT) and Thriving Kirklees (Healthy Child Programme)
Hot Food Takeaway definition	
Requirements for Hot Food Takeaways Applications	<ul style="list-style-type: none"> • HFT1 Public Health Toolkit • HFT2 Town Centre Vitality and Viability • HFT3 Proximity to Schools • HFT4 Noise abatement and extraction of odours • HFT5 Waste Disposal • HFT6 Takeaway design and community safety • HFT7 Highway Safety
Decision Making Flow Diagram	<ul style="list-style-type: none"> • Decision making flow diagram for assess hot food takeaway applications
Other Considerations and Legislation	<ul style="list-style-type: none"> • Licensing • Public Health/Food Safety • Environmental Health
Monitoring	<ul style="list-style-type: none"> • Annual Monitoring Report (AMR)

Appendix 1: Supporting information and evidence for Policy HFT1 Public Health Toolkit	<ul style="list-style-type: none"> • Explanation of points based Public Health Toolkit • The impact of obesity • Density of fast-food outlets
Appendix 2: Supporting information and evidence for Policy HFT2 Town Centre Vitality and Viability	
Appendix 3: Supporting information and evidence for Policy HFT3 Proximity to Schools	<ul style="list-style-type: none"> • Evidence supporting restrictive buffer around Kirklees schools • Evidence for using a 400m walking distance restrictive buffer • Methodology used to generate a 400m walking distance buffer

4. SA/SEA of the Local Plan

- 4.1 The Local Plan has itself been the subject of Sustainability Appraisal (including SEA) and this has included an assessment of the policies relevant to new hot food takeaways against the SA Objectives. This SA/SEA process was undertaken throughout the Local Plan preparation process. The relevant Sustainability Appraisal documents and the Local Plan can be found on the Council's website at: <http://www.kirklees.gov.uk/beta/planning-policy/local-plan-submission-documents-2017.aspx> (see SD5 - SD9).
- 4.2 An extract of the assessment matrix for the relevant policies LP16 and LP47 is shown in Appendix 2.

National Planning Practice Guidance (NPPG)

- 4.3 The NPPG states that supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already been assessed during the preparation of the Local Plan.
- 4.4 A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.
- 4.5 Before deciding whether significant environment effects are likely, the local planning authority should take into account the criteria specified in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 and consult the consultation bodies.

5. Screening Assessment

5.1 The document “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005), sets out eight criteria that should be taken into account when screening a plan or programme to determine whether it will require SEA. Tables 2 and 3 below provide the screening assessment using these criteria and the recommended methodology within the guide.

Table 2: Application of the SEA Directive to the proposed SPD

Screening Question	Y/N	Screening Assessment
Is the SPD subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority through legislative procedure by Parliament or Government?	Yes	The SPD will be prepared and adopted by Kirklees Council in its role as Local Planning Authority.
Is the SPD required by legislative, regulatory or administrative provisions?	No	Preparation of SPD is not a requirement of legislation, regulatory or administrative provisions.
Is the SPD prepared for agricultural, forestry, fisheries, energy, industry, transport or waste management, telecommunications, tourism, town and country planning or land-use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes	The SPD is intended to provide further guidance to the Kirklees Council Local Plan which is the planning policy framework for its area, including policy for land-use. The Local Plan has been subject to full Sustainability Appraisal (including SEA).
Will the SPD, in view of its likely effects on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	No	The local plan HRA (March 2017) rules out any adverse effects on Natura 2000 sites. As the SPD will not change or add to policy, proposals or designations within the Local Plan, it is not considered that further screening for such assessment is necessary as there would be no likely effects on European Sites.
Does the SPD determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2?	Yes	The Hot Food Takeaway SPD applies to the assessment of applications for new hot food takeaways and seeks to ensure the appropriate location of new hot food takeaways in Kirklees at a local level.
Does the SPD set the framework for future	No	This framework is already set within the Local Plan. The SPD does not allocate new sites and is

development consent of projects (not just projects in Annexes to the EIA Directive)?		consistent with the Local Plan. The SPD will provide additional guidance on the existing policies, proposals or allocations within the Local Plan. It will also provide tailored policy guidance with respect to hot food takeaways.
Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or EAGGF programmes 2000-2006/7?	No	N/A.
Is it likely to have a significant effect on the environment?	No	<p>The purpose of the SPD is to provide guidance to assist in the interpretation of adopted policies in the Local Plan. The Local Plan policies LP47 and LP16 which the SPD relates were themselves subject to an SEA (incorporated within the SA) through the Local Plan preparation process.</p> <p>The assessment of the Local Plan policies relevant to new hot food takeaways concluded that there were predominantly positive impacts and no overall negative impacts when assessed against the Local Plan SA Objectives (see Appendix 2). The additional guidance in the Hot Food Takeaways SPD will provide further detail tailored to inform the assessment and implementation of Local Plan policies and is not considered to amend policy provisions in the Local Plan. Therefore, it is considered that there is not likely to be a significant effect on the environment as a result of this SPD.</p>

Table 3: Determining the likely significance of effects

	<u>SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)</u>	<u>Comment</u>
The characteristics of plans and programmes, having regard, in particular, to:		
1a)	The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The SPD will provide further guidance to the policies, proposals and the allocations that are contained within the Local Plan which already sets the framework for the development projects and activities that could occur within the Kirklees area. The

		Local Plan as a whole, including those policies relevant to the hot food takeaways SPD, have been fully assessed for the purposes of SA/SEA. There will be no new policies or site allocations contained in the SPD. The SPD provides further information and guidance on implementation and interpretation of the existing policies
1b)	The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The Hot Food Takeaways SPD, in providing further guidance to the framework set within the Local Plan, does not directly affect other specific public sector plans or programmes but rather is influenced by the Local Plan and other higher tier planning policy, including the NPPF.
1c)	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	<p>The Local Plan and other higher-level policies set the context for achieving sustainable development. The Hot Food Takeaway SPD will provide further guidance as to how this can be achieved in relation to assessing applications for hot food takeaways. The SPD will not revisit or change the higher-level policy requirements which have been subject to SA/SEA. The SA Report (October 2016) shows policies relevant to hot food takeaways had a positive overall impact, including Local Plan policy LP47 and LP16 which also has a specific significant positive impact on:</p> <ul style="list-style-type: none"> • Protecting local amenity including avoiding noise and light pollution. • Improving the health of local people and ensuring that they can access the health and social care they need. • Protecting and enhancing existing provision and supporting the provision of new recreation facilities and areas of open space and encourage their usage. • Securing an effective and safe transport network which encourages people to make use of sustainable and active modes of transport. • Reducing air, water and soil pollution.
1d)	Environmental problems relevant to the plan or programme	The Local Plan SA did not identify any negative effects against the SA

		environmental objectives for the policies relevant to hot food takeaways.
1e)	The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	It is unlikely that there would be any significant impact resulting from the further guidance for hot food takeaways.
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a)	The probability, duration, frequency and reversibility of the effects	The SPD will cover the same period of time as the Local Plan. A Sustainability Appraisal was undertaken for the Local Plan which included an assessment of the policies relevant to hot food takeaways that will be supplemented by the SPD. The evidence to support the SA for the Local Plan continues to be updated and the assessment looked at the probability, duration, frequency and reversibility of effects. Whilst the SPD will provide further guidance and supplement the existing policies in the Local Plan (and have largely positive effect), the probability, duration, frequency and reversibility of the effects from the implementation of the SPD will remain the same.
2b)	The cumulative nature of the effects	There are no likely cumulative effects that would result from the production of the Hot Food Takeaway SPD.
2c)	The trans-boundary nature of the effects	There will be no national trans boundary effects resulting from the Hot Food Takeaways SPD given that it will only apply on a district wide basis. Local administrative trans boundary effects were considered as part of the SA/SEA of the Local Plan.
2d)	The risks to human health or the environment (e.g. due to accidents)	The proposals in the Hot Food Takeaway SPD are expected to provide a significant positive effect for human health and the environment, as identified in the Local Plan SA, as the proposals are expected to lead to better and more appropriately located hot food takeaways which will support human health in Kirklees.
2e)	The magnitude and spatial extent of the effects (geographical area and	The proposals in the SPD will cover the whole of the Kirklees district and likely

	size of the population likely to be affected)	provide increased positive effects, as identified in the Local Plan SA. Whilst the SPD proposals geographically affect the whole of the district the extent of these effects are likely to be localised to areas in the vicinity of new hot food takeaway proposals in Kirklees.
2f)	The value and vulnerability of the area likely to be affected due to: I. special natural characteristics or cultural heritage, II. exceeded environmental quality standards or limit values III. intensive land use	The value and vulnerability of the area affected by the SPD have been considered as part of the SA/SEA of the Local Plan and no significant impacts were identified in relation to this.
2g)	The effects on areas or landscapes which have a recognised national, Community or international protection status	The Local Plan does not allocate land for development within landscapes or areas of recognised national, community or international protection status.

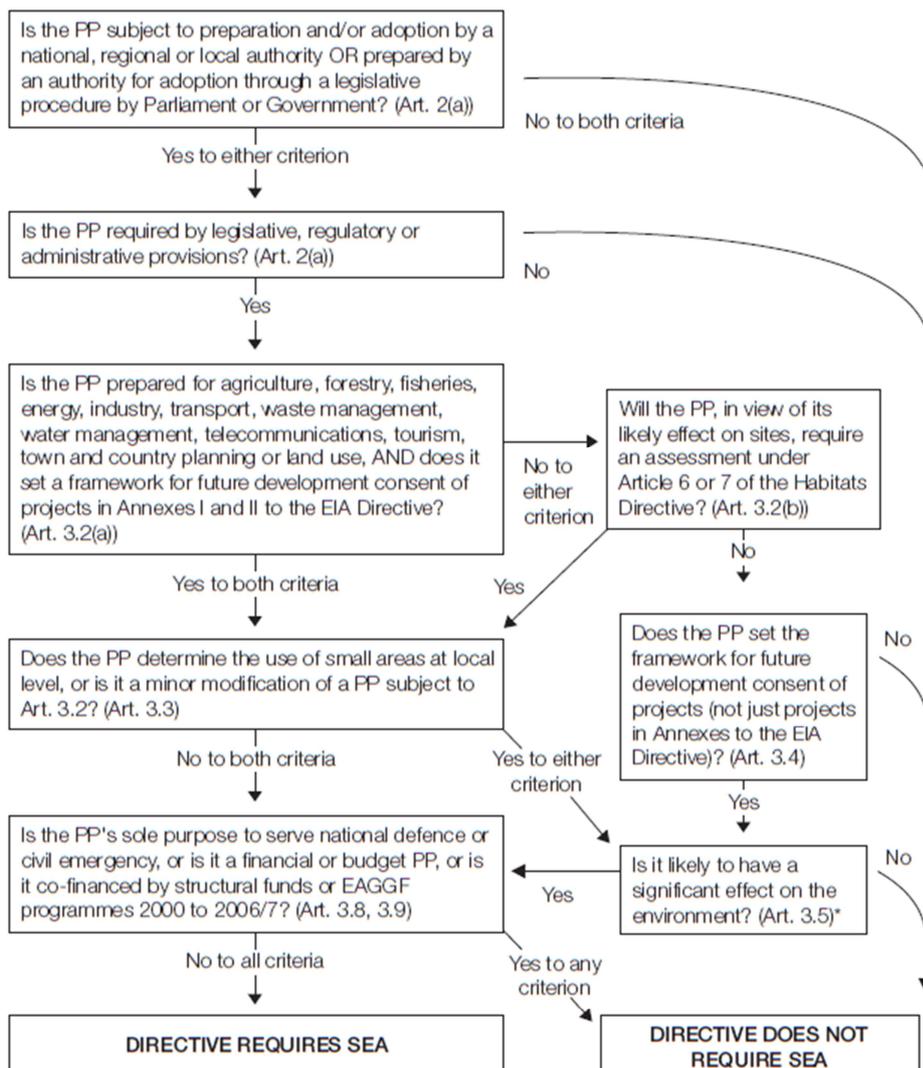
6. Conclusion

- 6.1 In considering the scope of the Hot Food Takeaway SPD against the eight criteria from the guidance document “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005), it is concluded that the SPD will not change or introduce new planning policy over and above the Local Plan.
- 6.2 Therefore, it is considered that the SPD does not need to be subject to further SEA given that the principles within the SPD have already been covered in the Local Plan SA.

Appendices

Appendix 1: Application of the SEA Directive to plans and programmes

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

Appendix 2: Sustainability Appraisal of Local Plan Policies

PLP16: Food and drink uses and the evening economy

PLP47: Healthy, active and safe lifestyles

PLP16: Food and drink uses and the evening economy

PLP16: Food and drink uses and the evening economy

SA Objectives	SA score	Justification
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	+	PLP16 seeks to avoid concentrations of food and drink-related uses and licenced entertainment uses within town centres, which could otherwise negatively affect their vitality and viability, particularly in the daytime (through the creation of frontages which are only in operation during night-time hours) and therefore have indirect adverse impacts on the town centre economy and associated jobs. The policy does permit such uses in defined centres provided that there would not be an inappropriate concentration, so would support job creation in relation to those uses. The detailed criteria in the policy relating to issues such as litter, antisocial behaviour and the appearance of buildings will help to ensure that town centres remain attractive, also benefitting the economy and associated jobs in terms of encouraging repeat visits to town centre locations. This approach will therefore have a minor positive effect on this SA objective.
2. Achieve an economy better capable of growth through	+	PLP16 seeks to avoid concentrations of food and drink-related uses and licenced entertainment uses within town centres, which could otherwise negatively affect their vitality and viability, particularly in the daytime (through the

SA Objectives	SA score	Justification
increasing investment, innovation and Entrepreneurship.		creation of frontages which are only in operation during night-time hours). The policy does permit such uses in defined centres provided that there would not be an inappropriate concentration. The detailed criteria in the policy relating to issues such as litter, antisocial behaviour and the appearance of buildings will help to ensure that town centres remain attractive, also benefitting the economy in terms of potential for inward investment given that this approach may encourage repeat visits to town centre locations. As such a minor positive effect is expected on SA objective.
3. Ensure education facilities are available to all.	0	The Policy is not likely to have a direct effect on this SA objective.
4. Improve the health of local people and ensure that they can access the health and social care they need.	+	PLP16 would seek to restrict concentrations of food and drink and licensed entertainment uses in town centres. This approach may be of benefit in terms of encouraging healthy lifestyles choices in Kirklees. A minor positive effect is therefore expected on this SA objective.
5. Protect local amenity including avoiding noise and light pollution.	++	PLP16 seeks to restrict concentrations of food and drink and licensed entertainment uses in town centres and requires consideration to be given to the impacts of noise, general disturbance, fumes, smells, litter and late night activity, including those impacts arising from the use of external areas. Therefore, a significant positive effect is likely on this SA objective.
6. Retain and enhance access to local services and facilities.	+	PLP16 seeks to restrict concentrations of food and drink and licensed entertainment uses in town centres which will help to ensure that units in accessible town centre locations remain available for other services and facilities and that areas of town centres do not become dominated by bars, takeaways etc. The policy also requires proposals for such uses not to harm the function, vitality and viability of town centres, and a minor positive effect is likely on this SA objective.
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	+	PLP16 seeks to restrict concentrations of food and drink and licensed entertainment uses in town centres and requires consideration to be given to the potential for antisocial behaviour to arise from the development. Therefore, a minor positive effect on this SA objective is likely.
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	0	The Policy is not likely to have a direct effect on this SA objective.
9. Ensure all people are able to live in a decent home which meets their needs.	0	The Policy is not likely to have a direct effect on this SA objective.
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	+	PLP16 seeks to restrict concentrations of food and drink and licensed entertainment uses in town centres and requires consideration to be given to the availability of public transport. As such the use of sustainable modes of transport may be encouraged thus helping to reduce car dependency in the District. A minor positive effect on this SA objective is therefore likely.
11. Secure the efficient and	0	The Policy is not likely to have a direct effect on this SA objective.

SA Objectives	SA score	Justification
prudent use of land.		
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	+	PLP16 seeks to restrict concentrations of food and drink and licensed entertainment uses in town centres and requires consideration to be given to the appearance of any associated extensions, flues and installations. It also requires consideration to be given to refuse storage. These measures are likely to be beneficial in terms of protecting local character and the townscape and therefore a minor positive effect is expected on this SA objective.
13. Conserve and enhance the historic environment, heritage assets and their settings.	+	PLP16 seeks to restrict concentrations of food and drink and licensed entertainment uses in town centres and requires consideration to be given to the appearance of any associated extensions, flues and installations as well as refuse storage. This approach is likely to reduce the potential for the setting of heritage assets and quality of the wider built environment to be adversely impacted upon by this type of development and therefore a minor positive effect is expected on this SA objective.
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	0	The Policy is not likely to have a direct effect on this SA objective.
15. Reduce air, water and soil pollution.	+	PLP16 seeks to restrict concentrations of food and drink and licensed entertainment uses in town centres and requires consideration to be given to the availability of public transport, parking and servicing. This approach should help to reduce the air pollution associated with transport and deliveries etc. and a minor positive effect on this SA objective is therefore likely.
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	0	The Policy is not likely to have a direct effect on this SA objective.
17. Increase prevention, re-use, recovery and recycling of waste close to source.	+	PLP16 seeks to restrict concentrations of food and drink and licensed entertainment uses in town centres and requires consideration to be given to the provision of refuse storage and disposal facilities. While this criterion is considered to primarily relate to amenity, it may help to encourage waste minimisation and the sustainable management of waste and a minor positive effect on this SA objective is therefore likely.
18. Increase efficiency in water, energy and raw material use.	0	The Policy is not likely to have a direct effect on this SA objective.
19. Reduce the contribution that the district makes to climate change.	+	PLP16 seeks to restrict concentrations of food and drink and licensed entertainment uses in town centres and requires consideration to be given to the availability of public transport, parking and servicing. This may help to reduce the greenhouse gas emissions associated with transport and deliveries etc. and therefore a minor positive effect on this SA objective is likely.

PLP47:

SA Objectives	SA score	Justification
1. Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	+	PLP47 supports active and sustainable transport use as well as the incorporation of active design into new developments. These measures could provide additional transport routes and links, which in turn could increase the accessibility of employment opportunities. A minor positive is therefore likely on this SA objective.
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	0	The Policy is not likely to have a direct effect on this SA objective.
3. Ensure education facilities are available to all.	+	PLP47 supports active and sustainable transport use as well as encouraging the incorporation of active design into new developments. These measures could provide additional transport routes and links, which in turn could increase the accessibility of educational institutions providing residents with more choice. A minor positive is therefore likely on this SA objective.
4. Improve the health of local people and ensure that they can access the health and social care they need.	++	<p>PLP47 seeks to increase access to high quality and well maintained green spaces and green infrastructure, active designs, play, sports, leisure and cultural facilities to promote health and mental well-being. The creation of high quality environments which minimise and mitigate against potential harm from risks such as pollution and other environmental hazards is also encouraged.</p> <p>Additionally, PLP47 seeks to ensure that the air quality in the district is monitored and maintained and where required, instigate appropriate mitigation measures as part of new development proposals which will contribute to improving health (especially relating to respiratory conditions). The Policy promotes the co-location of recreation and sport facilities within close proximity to community facilities for education and health which should improve accessibility of such facilities meaning residents will be more likely to make use of them. PLP47 also supports initiatives that address poor health indicators. In relation to reducing obesity, PLP47 aims to support initiatives which enable or improve access to healthy food and manage the location of hot food takeaways, especially in poor areas of health.</p> <p>Health Impact Assessments will be carried out for all proposals that are likely to have a significant impact on the health and well-being of the local communities, or particular groups within it, in order to identify measures to maximise the health benefits of the development and avoid any potential adverse impacts. A significant positive effect is therefore expected on this this SA objective.</p>
5. Protect local amenity including avoiding noise and light pollution.	+	PLP47 seeks to create high quality environments that are free from pollution. Therefore a minor positive effect is likely on this objective.

SA Objectives	SA score	Justification
6. Retain and enhance access to local services and facilities.	+	PLP47 supports active and sustainable transport use as well as the incorporation of active design into new developments. These measures could provide additional transport routes and links, which in turn, could increase the accessibility of local services and facilities. A minor positive is therefore likely on this objective.
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	+	PLP47 supports initiatives that address antisocial behaviour in the district. A minor positive is therefore likely on this SA objective.
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	++	PLP47 seeks to increase access to high quality and well maintained green spaces and green infrastructure, play, sports and leisure facilities. In addition, PLP47 supports active transport modes as well as the incorporation of active design into new developments. This approach could provide additional routes and links, which could help to improve access to local recreation facilities. A significant positive effect is therefore likely on this SA objective.
9. Ensure all people are able to live in a decent home which meets their needs.	0	The Policy is not likely to have a direct effect on this SA objective.
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	++	PLP47 supports the use of active and sustainable modes of transport as well as encouraging the incorporation of active design into new developments. A significant effect is therefore likely on this SA objective.
11. Secure the efficient and prudent use of land.	0	The Policy is not likely to have a direct effect on this SA objective.
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	0	The Policy is not likely to have a direct effect on this SA objective.
13. Conserve and enhance the historic environment, heritage assets and their settings.	0	The Policy is not likely to have a direct effect on this SA objective.
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	+	Creating high-quality, inclusive and green environments, will contribute to enhancing biodiversity and improving local habitat provision in Kirklees. As such, a minor positive effect is likely on this SA objective.
15. Reduce air, water and soil pollution.	++	PLP47 aims to create high quality environments which minimise and mitigate against potential harm from risks such as pollution and other environmental hazards. Additionally, the Policy seeks to ensure that the air quality in the district is monitored and maintained and where required and instigate appropriate mitigation measures as part of new development proposals. A significant positive effect is therefore likely on this SA objective.
16. Prevent inappropriate new development in flood risk areas and ensure development does not	+	PLP47 seeks to increase access to open space and green infrastructure. These can be beneficial in relation to mitigating flood risk. A minor positive effect is therefore likely on this objective.

SA Objectives	SA score	Justification
contribute to increased flood risk for existing property and people.		
17. Increase prevention, re-use, recovery and recycling of waste close to source.	0	The Policy is not likely to have a direct effect on this SA objective.
18. Increase efficiency in water, energy and raw material use.	0	The Policy is not likely to have a direct effect on this SA objective.
19. Reduce the contribution that the district makes to climate change.	+	PLP47 supports active and sustainable modes of transport as well as encouraging the incorporation of active design into new developments. A minor effect is therefore likely on this SA objective as it promotes modal shift from private car use to sustainable forms of transport which should help to reduce the associated greenhouse gas emissions.