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Draft Kirklees Local Plan

Sustainability Appraisal Report

Incorporating Equalities Impact Assessment and Health Impact Assessment

Prepared by LUC September 2015 **Project Title**: Sustainability Appraisal of the Kirklees Local Plan

Client: Kirklees Council

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Tell us what you think about the draft Local Plan and its supporting information

This is the Kirklees Draft Local Plan Sustainability Appraisal Report, this document is available for comment during the consultation on the Draft Local Plan.

The draft local plan documents consist of:

- Draft Local Plan Strategy and Policies
- Draft Local Plan Allocations and Designations (and associated maps)

Documents setting out rejected site options (and maps) and the outcomes of the green belt review (and maps) are also available for consultation and comments can be made on them.

You can send your responses in a number of ways but we would encourage you to submit them online via the Kirklees consultation pages at:

kirklees.gov.uk/consultplanningpolicy

If you are on our consultation database, we will have notified you about the draft Local Plan consultation and registered you on our on-line consultation system. If you are not currently on our Local Plan database you will need to register with our on-line consultation system.

You can also send your comments by e-mail to: local.development@kirklees.gov.uk

By post to:

Planning Policy Group PO Box B93 Civic Centre 3 Market Street Huddersfield HD1 2JR

Copies of the consultation documents and maps are available to view on our website at kirklees.gov.uk/planningpolicy, and in printed format at the following locations:

Huddersfield Customer Service Centre	Dewsbury Service Centre
Civic Centre 3	The Walsh Building
Market Street	Town Hall Way
Huddersfield	Dewsbury
HD1 2YZ	WF12 8EE

Please use one method of reply only to avoid duplication of representations. All comments must be received by **5pm on 21st December 2015**. Comments received after this date will not be considered to be duly made and may not be considered.

How will we use the information you give us?

Any comments received will be used help us to improve the way we develop our plans and policies. We will take the views and suggestions received through consultations into account when finalising our plans. The information may be used to seek your opinion on future plans and policies appropriate to your interests. Once your comments have been submitted they will be checked and added to the on-line consultation system where you will be able to see your comments and those that have been made by others. Your name and comments will be displayed publicly. Your comments may be disregarded if they are deemed to be disrespectful, offensive, break the law or link to inappropriate web-sites or contain marketing/sales information.

Data Protection Statement

The consultation process requires that you supply personal information about yourself. The purpose for collecting these details is to help us understand who is contributing to our consultation and so the Council can keep you informed of the next steps in the process. Personal information the council receives will be stored confidentially within a secure database and will be retained for up to 6 years. Personal information will not be retained longer than we need to and, once the retention period is over the council will ensure that records are either fully anonymised or are securely destroyed. We will not pass on personal details to any third party organisations. If you do not provide contact information the Council will not be able to keep you informed of progress and next steps on the local plan.

Next steps

Following the close of the consultation period, we will consider your comments, gather further evidence where required and redraft the local plan. We will then ask for your views on a publication version and ask whether the revised Local Plan meets the Government's tests of soundness. Once the Council is satisfied its plan is sound we will formally submit the local plan to the Government for inspection. At this point an examination in public will take place. Further to the examination in public, it is anticipated that the plan will be adopted in late 2017.



Draft Kirklees Local Plan

Sustainability Appraisal Report

Incorporating Equalities Impact Assessment and Health Impact Assessment Prepared by LUC in conjunction with Kirklees Council September 2015



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1 Introduction

- 1.1 This Sustainability Appraisal Report has been prepared by LUC on behalf of Kirklees Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the emerging Kirklees Local Plan.
- 1.2 This report relates to the Draft Local Plan (November 2015) which comprises two parts: "Strategy and Policies" and "Allocations and Designations". This SA report should therefore be read in conjunction with those documents.

Context for the Kirklees Local Plan

- 1.3 Kirklees covers an area of 40,860 hectares within West Yorkshire. The resident population of the District in 2013 was 428,279 people, and by 2023 it is predicted to reach 456,200¹. The road and rail network provides good links to the surrounding cities of Manchester, Leeds, Bradford and Sheffield, with wider reaching connections provided via the M62 and the M1.
- 1.4 The District is diverse in character, comprising urban conurbations (which contain the majority of the population) in the north and west, most notably Huddersfield, and large areas of green belt in the south.
- 1.5 Although much of the District is urban in character there are high value natural assets which need to be protected from development pressures. The south western parts of the District's upper moorland form 10% of the Peak District National Park, with much of the remainder being within the much larger South Pennine Heritage Area. These moorlands provide a range of habitats and contain a number of species that have ecological significance of European importance and form part of the South Pennines Special Area of Conservation (SAC) and the Special Protection Area (SPA).
- 1.6 In addition to the SAC and SPA, Kirklees contains five Sites of Special Scientific Interest (SSSIs) covering 4,872.5 ha of land, three of which are classed as being in 'favourable' condition and two as being in 'unfavourable recovering' condition. In addition, there are 45 Sites of Wildlife Significance and 84 Biodiversity Action Plan sites (also known as priority habitats), and the Council has designated nine Local Nature Reserves, the majority of which are within or very close to built up areas.
- 1.7 Kirklees also has a high value built environment, with some 3,000 listed buildings, which is the highest number of any local planning authority in the region. Of these, 20 are on the Heritage at Risk Register². Huddersfield, which is home to a particularly fine set of Victorian public and commercial buildings, has the third highest number of listed buildings of any town or city in England. In addition, there are 59 Conservation Areas, five Registered Parks and Gardens, 19 Scheduled Monuments and part of a Registered Battlefield at Adwalton Moor.

The Local Plan

1.8 Between 2005 and 2012, Kirklees Council was preparing a Local Development Framework (LDF) Core Strategy. The Core Strategy would provide the framework for planning decisions in Kirklees up to 2028, setting out how much development should take place and broadly where, and including policies to ensure that development would take place in a sustainable way.

1

¹ Kirklees Factsheet 2014: Population and Households.

² Historic England. Heritage at Risk Register. Accessed February 2015.

- 1.9 The Core Strategy was submitted to the Secretary of State in 2012; however in October 2013 the decision was made to withdraw the Core Strategy and move towards the production of a new-style Local Plan instead. The reasons for this decision are explained in detail on the Council's website³.
- 1.10 The new Local Plan will set out how Kirklees will develop over the next 15-20 years. It will identify site allocations for specific types of land use and set out policies that will be used to assess planning applications.
- 1.11 An 'Early Engagement Report' relating to the new Local Plan was consulted on between April and May 2014. That report set out information about what would be included in the Local Plan and when and how it would be prepared. It also presented a draft vision and strategic objectives which were taken from the withdrawn Core Strategy and the Council invited comments on how they might be amended for inclusion in the new Local Plan.
- 1.12 A further engagement exercise was carried out between November and December 2014. The engagement document that was consulted on set out information about:
 - The new Local Plan for Kirklees, and the process of how it will be developed.
 - The ambition for the future of Kirklees and how a Local Plan can help achieve this ambition.
 - Key statistics, facts and information for the basis of the Kirklees Local Plan.
 - Options for how Kirklees Council can decide where new development could go.
- 1.13 This engagement information can be viewed online at www.kirklees.gov.uk/localplan.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.14 Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.15 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive⁴, which was transposed into UK law by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)⁵. The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.
- 1.16 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance⁶ shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process and presenting a single SA report that incorporates the requirements of the SEA Regulations. The SA/SEA of the Kirklees Local Plan is being prepared in line with this integrated approach and throughout this report the abbreviation 'SA' should therefore be taken to mean 'SA incorporating the requirements of SEA'.

Habitats Regulations Assessment

1.17 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land use plans are also subject to Habitats

 $^{^{3} \} Council \ Report \ 23^{rd} \ October \ 2013, \ available \ at: \ https://www.kirklees.gov.uk/secure/meetings/pdfs/1013/COUNCIL23101349544D.pdf$

⁴ SEA Directive 2001/42/EC

 $^{^{\}rm 5}$ Under EU Directives 2011/92/EU and 2014/52/EC concerning EIA

⁶ http://planningguidance.planningportal.gov.uk/

Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Kirklees Local Plan is also being undertaken by LUC and the findings will be taken into account in the SA where relevant as they become available.

Equalities Impact Assessment

- 1.18 The requirement to undertake formal Equalities Impact Assessment (EqIA) of plans was introduced in the Equality Act 2010, but was abolished in 2012 as part of a Government bid to reduce bureaucracy. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.
- 1.19 In fulfilling this duty, many authorities still find it useful to produce a written record of equalities issues having been specifically considered. Therefore, an EqIA note has been prepared, setting out how the Draft Local Plan is likely to be compatible or incompatible with the duties that Kirklees Council must perform under the Equalities Act 2010. The EqIA can be found in **Appendix 6** of this report.

Health Impact Assessment

1.20 Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. Health issues are addressed to some extent through the SA; however a separate HIA has also been carried out in relation to the Draft Local Plan as a whole and can be found in **Appendix 7**.

Structure of this report

1.21 This report is the SA report for the Draft Local Plan (November 2015). **Table 1.1** below signposts how the requirements of the SEA Regulations have been met within the SA work undertaken to date.

Table 1.1 Requirements of the SEA Regulations and where these have been addressed

SEA Regulation Requirements	Where covered in this SA report	
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):		
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapter 3 and Appendix 2.	
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3 and Appendix 3.	
c) The environmental characteristics of areas likely to be significantly affected	Chapter 3 and Appendix 3.	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 and Appendix 3.	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Chapter 3 and Appendix 2.	

SE	A Regulation Requirements	Where covered in this SA report
f)	The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Chapters 4-12 and Annexes 1-7.
g)	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapters 4-12 and Annexes 1-7.
h)	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 2 and 4-12 and Appendix 5.
i)	a description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 6.
j)	a non-technical summary of the information provided under the above headings	A separate non-technical summary document has been prepared to accompany this full SA report.
red ass pro ext at	e report shall include the information that may reasonably be quired taking into account current knowledge and methods of sessment, the contents and level of detail in the plan or ogramme, its stage in the decision-making process and the tent to which certain matters are more appropriately assessed different levels in that process to avoid duplication of the sessment (Art. 5.2)	Addressed throughout this SA report.
	ensultation:	Consultation on the SA Scoping
•	authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4)	Report for the Kirklees Local Plan was undertaken between March and April 2015. The report was then updated in response to consultation responses received and the final version was published in May 2015.
•	authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	Consultation is being undertaken in relation to the Draft Kirklees Local Plan between November 2015 and December 2016 and will continue to be undertaken for all future iterations of the plan. The current consultation documents are accompanied by this SA report.
•	other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	N/A

SEA Regulation Requirements	Where covered in this SA report
Taking the environmental report and the results of the con-	sultations into account in
decision-making (Art. 8)	
Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:	To be addressed after the Local Plan is adopted.
 the plan or programme as adopted 	
 a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures decided concerning monitoring (Art. 9) 	
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	To be addressed after the Local Plan is adopted.
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Directive have been met.

- 1.22 This section has introduced the SA process for the Kirklees Local Plan. The remainder of this report is structured into the following sections:
 - Chapter 2: Methodology describes the approach that has been taken to the SA of the Local Plan to date and introduces the SA framework used in the appraisal.
 - Chapter 3: Sustainability context for development in Kirklees summarises the relationship between the Kirklees Local Plan and other relevant plans, policies and programmes, summarises the social, economic and environmental characteristics of the District and identifies the key sustainability issues facing Kirklees.
 - Chapter 4-10: Sustainability Appraisal findings for the site options set out the SA findings for the residential, employment, mixed use, Traveller, open space, minerals and waste site options that have been considered for allocation in the Local Plan.
 - Chapter 11: Sustainability Appraisal findings for the policy options describes the SA findings for the draft policies in the Draft Local Plan and the alternatives considered. For each draft policy, information is provided about the reasons for selecting the policy option taken in the Draft Local Plan and for rejecting other reasonable alternatives.
 - Chapter 12: Summary of SA findings for the Draft Local Plan summarises the SA findings and considers the likely cumulative effects of the Draft Local Plan as a whole, including both the Draft Policies and the allocated sites. Consideration is also given to possible mitigation measures and recommendations are made for ways in which to maximise the benefits of the Local Plan and minimise any adverse effects.
 - Chapter 13: Monitoring describes the approach that should be taken to monitoring the likely significant effects of the Local Plan (both positive and negative) and proposes monitoring indicators.
 - Chapter 14: Conclusions summarises the key findings from the SA and describes the next steps to be undertaken in the plan preparation process.
- 1.23 The main body of the report is supported by a number of appendices:
 - Appendix 1 presents the consultation comments that were received in relation to the SA Scoping Report in spring 2015 and describes how those comments were addressed in the final version of the Scoping Report.

- Appendix 2 sets out the review of relevant plans, policies and programmes (this was originally presented in the SA Scoping Report and has been updated to reflect the consultation comments received).
- **Appendix 3** contains the baseline information for Kirklees (as with appendix 2, this was originally presented in the SA Scoping Report and has been updated to reflect the consultation comments received).
- **Appendix 4** presents the assumptions that were applied during the appraisal of the site options to ensure consistency, as described in **Chapter 2**.
- **Appendix 5** presents maps showing the locations of the sites that are allocated in the Draft Local Plan.
- Appendix 6 presents the Equalities Impact Assessment for the Draft Local Plan.
- Appendix 7 presents the Health Impact Assessment for the Draft Local Plan.
- 1.24 Due to the large number of options considered by Kirklees Council, the detailed SA matrices for the site and policy options can be found in separate **Annexes** as follows:
 - Annex 1 Residential Site Options SA Matrices.
 - Annex 2 Employment Site Options SA Matrices.
 - Annex 3 Mixed Use Site Options SA Matrices.
 - Annex 4 Open Space Site Options SA Matrices.
 - Annex 5 Traveller Site Options SA Matrices.
 - Annex 6 Minerals and Waste Site Options SA Matrices.
 - Annex 7 Policy Options SA Matrices.

2 Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the SA of the Kirklees Local Plan is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process. **Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Table 2.1 Corresponding stages in plan making and SA

Local Plan Step 1: Evidence Gathering and engagement

SA stages and tasks

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- 1: Identifying other relevant policies, plans and programmes, and sustainability objectives
- 2: Collecting baseline information
- 3: Identifying sustainability issues and problems
- 4: Developing the SA framework
- 5: Consulting on the scope of the SA

Local Plan Step 2: Production

SA stages and tasks

Stage B: Developing and refining options and assessing effects

- 1: Testing the Plan objectives against the SA Framework
- 2: Developing the Plan options
- 3: Evaluating the effects of the Plan
- 4: Considering ways of mitigating adverse effects and maximising beneficial effects
- 5: Proposing measures to monitor the significant effects of implementing the Plans

Stage C: Preparing the Sustainability Appraisal Report

• 1: Preparing the SA Report

Stage D: Seek representations on the Plan and the Sustainability Appraisal Report

- 1: Public participation on Plan and the SA Report
- 2(i): Appraising significant changes

Local Plan Step 3: Examination

SA stages and tasks

• 2(ii): Appraising significant changes resulting from representations

Local Plan Step 4 & 5: Adoption and Monitoring

SA stages and tasks

• 3: Making decisions and providing information

Stage E: Monitoring the significant effects of implementing the Plan

- 1: Finalising aims and methods for monitoring
- 2: Responding to adverse effects
- 2.2 The following sections describe the approach that has been taken to the SA of the Kirklees Local Plan to date and provide information on the subsequent stages of the process.

Stage A: Scoping

- 2.3 The SA process began in March 2015 with the production of a Scoping Report for the Local Plan, which was prepared by LUC on behalf of Kirklees Council. During the Scoping stage of the SA the work that had previously been carried out during the SA of the Core Strategy was drawn on as appropriate, as some of that work remained valid.
- 2.4 The Scoping stage of SA involves collating information about the social, economic and environmental baseline for the plan area and the key sustainability issues facing it, as well as information about the policy context for the preparation of the plan. The SA Scoping Report presented the outputs of the following tasks:
 - Policies, plans and programmes of relevance to the Kirklees Local Plan were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
 - In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and the landscape. Data on social and economic issues were also taken in to consideration. This baseline information provides the basis for predicting and monitoring the likely effects of the Local Plan and helps to identify alternative ways of dealing with any adverse effects identified.
 - Drawing on the review of relevant plans, policies and programmes and the baseline information, key sustainability issues for the District were identified (including environmental problems, as required by the SEA Regulations). Consideration was given to the likely evolution of each issue, if the Local Plan were not to be implemented.
 - A Sustainability Appraisal 'framework' was then presented, setting out the SA objectives against which options and subsequently policies in the Local Plan would be appraised. The SA framework provides a way in which the sustainability impacts of implementing a plan can be described, analysed and compared. The SA framework comprises a series of sustainability objectives and associated questions that can be used to 'interrogate' options and draft policies during the plan-making process. These SA objectives define the long-term aspirations of the District with regard to social, economic and environmental issues. During the SA, the performance of the policy and site options (and subsequently draft policies and site allocations) are assessed against these SA objectives and sub-questions.
- 2.5 The review of relevant plans, policies and programmes and the baseline information will be updated as necessary during each stage of the SA process to ensure that they reflect the current situation in Kirklees and continue to provide an accurate basis for assessing the likely effects of the Local Plan.
- 2.6 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The

- SA Scoping Report for the Kirklees Local Plan was published in March 2015 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England). The comments received during the consultation were then reviewed and addressed as appropriate and a final version of the Scoping Report was published in May 2015.
- 2.7 **Appendix 1** of this report lists the comments that were received during the Scoping consultation and describes how each one has been addressed. In light of the comments received, a number of amendments were made to the review of plans, policies and programmes, the baseline information, key sustainability issues and the SA framework. These amendments were reflected in the final SA Scoping Report (May 2015) and are reflected in the parts of the Scoping work that are presented in **Appendices 2 and 3** of this report and summarised in **Chapter 3**.
- 2.8 **Table 2.2** below presents the 19 SA objectives in the Kirklees SA framework and shows how all of the 'SEA topics' have been covered by the SA objectives.

Table 2.2 SA framework for Kirklees

SA Objectives	SEA Directive Topic(s)
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	Population
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	Population
3. Ensure education facilities are available to all.	Population
4. Improve the health of local people and ensure that they can access the health and social care they need.	Population Human health
5. Protect local amenity including avoiding noise and light pollution.	Population Human health
6. Retain and enhance access to local services and facilities.	Population
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	Population
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	Population
9. Ensure all people are able to live in a decent home which meets their needs.	Population
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	Air
11. Secure the efficient and prudent use of land.	Soil
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	Landscape
13. Conserve and enhance the historic environment, heritage assets and their settings.	Cultural heritage including architectural and archaeological heritage Material assets
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	Biodiversity Flora Fauna
15. Reduce air, water and soil pollution.	Soil Water Air
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	Material assets
17. Increase prevention, re-use, recovery and recycling of waste close to source.	Material assets
18. Increase efficiency in water, energy and raw material use.	Water Material Assets
19. Reduce the contribution that the District makes to climate change.	Climatic Factors

SA Stage B: Developing and refining options and assessing effects

- 2.9 Developing options for a plan is an iterative process, usually involving a number of rounds of consultation with stakeholders and the public. Consultation responses and the SA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In terms of the Kirklees Local Plan, options include different policy approaches to delivering future development (i.e. options for how much development, what type of development and how it should be designed and delivered) and locational options for where development should or should not go.
- 2.10 Regulation 12 (2) of the SEA Regulations requires that:
 - "The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—
 - (a) implementing the plan or programme; and
 - (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."
- 2.11 It should be noted that any alternatives considered to the plan need to be "reasonable". This implies that alternatives that are "not reasonable" do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or comply with national policy (e.g. the National Planning Policy Framework). In the context of site options, unreasonable options may be sites that are unavailable or undeliverable.
- 2.12 Finally, it also needs to be recognised that the SA findings are not the only factors taken into account when determining which options to take forward in a plan. There will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.
- 2.13 The following sections provide an overview of how the appraisal of options has fed into the development of the draft policies that are now set out in the Draft Kirklees Local Plan. The detailed selection process for the options relating to each policy theme is described in **Chapter 11** and the specific reasons for selecting or rejecting each site option are set out in **Appendix 5**.

Identification and appraisal of policy and site options

- 2.14 The alternative options for Local Plan policies have been identified by Kirklees Council and have drawn from the most up-to-date evidence, in particular in relation to the levels of development required in the District. For several of the proposed policy approaches, reasonable alternatives were not identified as any approach other than that set out in the draft policy would be incompatible with the requirements of the NPPF.
- 2.15 Site options were identified through a number of sources including a Call for Sites process, a review of Council assets, existing UDP allocations and existing UDP Provisional Open Land. The Council identified those sites that were deliverable and (in the case of site options for built development) were developable, and these were also considered to be 'reasonable' options for the purposes of the SA.
- 2.16 All of the reasonable site options for residential, employment and other types of development and the reasonable policy options were subject to SA in accordance with the methodology that was set out in the Scoping Report (also described further ahead in this section). Kirklees Council officers prepared the SA matrices for the Open Space, Minerals and Waste and Traveller site options and these are presented in **Annexes 4**, **5** and **6**. LUC prepared the SA matrices for Residential, Employment, Mixed Use site options (presented in **Annexes 1**, **2 and 3**) and the policy options matrices in **Annex 7**.
- 2.17 The findings were presented in SA summary notes which were provided to the Kirklees Council officers preparing the Local Plan. These SA summary notes were working documents intended to inform the plan preparation process, rather than full SA reports and were not made publicly

- available at the time. The content of each summary note was broadly the same as the information now set out in **Chapters 4-10** of this SA report.
- 2.18 The Council took into account the findings of the SA as well as other relevant factors when deciding which policy options to include as draft policies in the Draft Local Plan (Strategy and Policies document), and which site options to include in the Allocations and Designations document. This decision making process is described in detail for the policy options in **Chapter 11** of this report. For the site options, the Council has prepared a Rejected Site Options Report which explains the reasons why sites that have not been allocated in the Local Plan were rejected. The Rejected Sites Options Report demonstrates how the decision-making process was informed by the Council's red/amber/green assessment of the site options in relation to topics including transport, public health, flood/drainage, biodiversity, historic environment etc. As well as sites being rejected for scoring poorly in those assessments, other sites were rejected based on reasons such as the site overlapping with an allocated site, the land now being developed or the landowner being unwilling. These reasons are documented in detail in the Rejected Site Options Report.

SA Stage C: Preparing the Sustainability Appraisal Report

2.19 This SA report describes the process that has been undertaken to date in carrying out the SA of the Kirklees Local Plan. It sets out the findings of the appraisal of policy and site options and the draft policies and site allocations included in the Draft Local Plan, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the plan as it is drafted in full. It also describes the reasons for selecting or rejecting certain options during the preparation of the Draft Local Plan.

SA Stage D: Consultation on the Kirklees Local Plan and this SA Report

2.20 Kirklees Council is inviting comments on the Draft Local Plan and this SA Report. The SA Report is being published on the Council's website for consultation alongside the Local Plan between November 2015 and December 2016.

SA Stage E: Monitoring implementation of the Local Plan

2.21 Recommendations for monitoring the social, environmental and economic effects of implementing the Kirklees Local Plan are presented in **Chapter 13**.

Appraisal methodology

2.22 The reasonable policy and site options for the Local Plan and the draft policies set out in the Draft Local Plan (November 2015) have been appraised against the 19 SA objectives in the SA framework (see **Table 2.2** earlier in this section), with scores being attributed to each option or draft policy to indicate its likely sustainability effects on each objective as follows:

Figure 2.1 Key to symbols and colour coding used in the SA of the Kirklees Local Plan

++	The option is likely to have a significant positive impact on the SA objective(s).
+	The option is likely to have a positive impact on the SA objective(s).
0	The option is likely to have a negligible or no impact on the SA objective(s).
-	The option is likely to have a negative impact on the SA objective(s).
	The option is likely to have a significant negative impact on the SA objective(s).
?	It is uncertain what effect the option will have on the SA objective(s), due to a lack of data.
+/-	The option is likely to have a mixture of positive and negative impacts on the SA objective(s).

- 2.23 Note that where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 2.24 The likely effects of the options and draft policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects and record these through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or draft policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.
- 2.25 The SA findings for the Local Plan policy and site options are described in **Chapters 4-11** and the likely effects of proposed policies and site allocations included in the Draft Local Plan are summarised in **Chapter 12**, including an assessment of the potential cumulative impacts of the draft policies and site allocations taken as a whole.

Assumptions applied during the SA

- 2.26 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the numerous site options, detailed sets of assumptions were developed and applied for each type of site (e.g. residential, employment, mixed use, open space, Traveller, minerals and waste sites). These assumptions are presented in **Appendix 4** (Tables A4.1-A4.7). The assumptions were mainly applied through the use of Geographical Information Systems (GIS) data.
- 2.27 A number of the assumptions involve drawing on accessibility 'heatmapping' work that was undertaken by the West Yorkshire Combined Authority on behalf of Kirklees Council. This work involved assessing the level of accessibility of each site option to a range of services and facilities via non-car based modes of transport.
- 2.28 Two different types of heatmapping work were undertaken. The first was carried out in relation to the residential and Traveller site options, as well as the mixed use site options that would incorporate partly residential development. This involved assessing how accessible eight different features⁷ are from each site and then illustrating this on site maps using colour coded contours. The colour coded scale ran from green to red, with each shade corresponding to a certain travel time (e.g. 0-5 minutes, 5-10 minutes etc.). Sites were colour coded green (and therefore considered as having good access) for the feature in question when they are within the journey

⁷ The eight features considered are: primary schools, secondary schools, further education, GPs, hospitals, employment nodes, local centres and town/district centres.

- time standards set out by the Department for Transport⁸, which vary for each of the eight features. Eight separate colour coded maps were created for each site to show the level of access to each of the features assessed.
- 2.29 The second type of heatmapping was undertaken in relation to the options for employment development, and for the mixed use site options where they could incorporate some employment uses. This work involved mapping the area around each site option within which the site could be accessed within 20 minutes via non-car based modes of transport. Kirklees Council then calculated the number of people of working age (16-64) living within that area and the resulting 'population catchment' data was used to inform the SA findings.
- 2.30 The assumptions set out in **Appendix 4** clearly explain where and how specifically the heatmapping work has informed the SA scores for site options, and where other information has been used. The heatmapping work was generally used to inform the SA scores for social and economic objectives e.g. those relating to access to employment, education and healthcare, while other sources of information were used to determine the likely effects of site options on other SA objectives.

Difficulties Encountered

- 2.31 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.
- 2.32 A particular challenge in this SA work was the very high number of reasonable alternative site options to be appraised. There was a need to ensure that a very large number of site options could be appraised consistently by a number of LUC and Kirklees Council staff in order that the findings could reliably inform the Council's decision making. This was achieved by the use of prescribed assumptions for each type of site relating to each SA objective, as described in the previous section.
- 2.33 As also described above, many of the SA scores for the site options were informed by the heatmapping work that was undertaken by the West Yorkshire Combined Authority on behalf of Kirklees Council. While this heatmapping work provides a very helpful indication of the relative accessibility of each site, it was underpinned by a number of assumptions which need to be borne in mind when using the data:
 - It was assumed that people would walk up to 400m to the first connection involved in their journey (e.g. a bus stop); however, it is recognised that some people will walk further than this, while others could not walk as far.
 - An average walking speed of 4.8km/hour was assumed; again, some people will walk faster
 which would mean that a wider area is accessible within a given time, while others would be
 slower.
 - A five minute time penalty was applied where there is a need to interchange between modes of travel. In reality, interchange times may be greater or less than this, potentially making a difference to the total travel time.
 - The assessment of journey times was calculated on the basis of a regular grid matrix with origin points spaced every 200 meters. Contours on the heatmaps were shown as straight lines between those points.
 - Where heatmaps took into account transport links in neighbouring districts, this data was only
 available for the West Yorkshire authorities. However, most of the site options near to the
 edge of Kirklees are near to borders with other West Yorkshire authorities.
- 2.34 Finally, one of the mixed use site options (MX1902) is located on the very edge of Kirklees District, partly within Leeds City Council area, and not all of the GIS datasets used to inform the SA were available for the Leeds City local authority area.

⁸ Guidance on DfT Accessibility Standards:

 $https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/372139/accessibility-statistics-guidance.pdf$

3 Sustainability Context for Development in Kirklees

Review of Plans, Policies and Programmes

- 3.1 The Kirklees Local Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. The Local Plan must also conform to environmental protection legislation and contribute to achieving the sustainability objectives established at the international and national levels.
- 3.2 A review has been undertaken of the other plans, policies and programmes that are relevant to the Kirklees Local Plan. This review, which was originally presented in the SA Scoping Report, can be seen in full in **Appendix 2** and the key findings are summarised below.
- 3.3 Schedule 2 of the SEA Regulations requires:
 - (1) "an outline of the...relationship with other relevant plans or programmes"; and
 - (5) "the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"
- 3.4 It is necessary to identify the relationships between the Kirklees Local Plan and other relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies or potential conflicts addressed.
 - Key international plans, policies and programmes
- 3.5 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment and Habitats Regulations Assessment to be undertaken in relation to the emerging Kirklees Local Plan. These processes should be undertaken iteratively and integrated into the production of the Local Plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and mitigated.
- 3.6 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however the relevant international directives have been included in **Appendix 2** for completeness.
 - Key national plans, policies and programmes
- 3.7 The most significant development in terms of the national policy context for the Kirklees Local Plan has been the publication of the new National Planning Policy Framework in 2012 which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The purpose of the NPPF was to streamline national planning policy. The Local Plan must be consistent with the requirements of the NPPF.
- 3.8 The NPPF sets out information about the purposes of local plan-making, stating that:
 - "Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."

- 3.9 The NPPF also requires Local Plans to be 'aspirational but realistic'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 3.10 The NPPF requires local planning authorities to set out the strategic priorities for the plan area. This should include strategic policies to deliver:
 - the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - the provision of health, security, community and cultural infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 3.11 In addition, Local Plans should:
 - plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
 - be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
 - be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
 - indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
 - allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
 - identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
 - identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
 - contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

Local plans, policies and programmes

3.12 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to West Yorkshire and Kirklees, which provide further context for the emerging Local Plan. These plans and programmes relate to issues such as housing, transport, renewable energy and green infrastructure and have also been reviewed in **Appendix 2**.

Baseline Information

- 3.13 Baseline information provides the context for assessing the sustainability of proposals in the Kirklees Local Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.
- 3.14 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between

the above factors. As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included; for example information about housing, social inclusiveness, transport, energy, waste and economic growth. The baseline information for Kirklees, which was originally presented in the Scoping Report, is set out in **Appendix 3**.

Key Sustainability Issues

- 3.15 An up-to-date set of key sustainability issues for Kirklees was identified during the Scoping stage of the SA and was presented in the Scoping Report.
- 3.16 The SEA Regulations (Schedule 2) require that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme are described. In order to address this requirement, **Table 3.1** overleaf describes the likely evolution of each key sustainability issue if the Kirklees Local Plan were not to be adopted.

Table 3.1: Key Sustainability Issues for the Kirklees Local Plan

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
Business Growth and Employment - Employment in Kirklees is below the national average and the unemployment rate significantly increased between 2008 and 2010. The proportion of people claiming Job Seekers Allowance for more than six months is above the national average.	The saved Business and Industry Policy B1 in the adopted Kirklees Unitary Development Plan (UDP) states that the employment needs of the District will be met by the implementation of measures such as the provision of land for new business/expansion of existing business, encouraging the development of land within town centres for office use and the promotion of tourism. In addition, the NPPF states that "the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future" (paragraph 18). Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy.
	Unemployment levels in Kirklees are currently slightly higher than the national average, however, the number of people claiming Jobseeker's Allowance as a percentage of the working age resident population has reduced. Given that Policy B1 has been in place since 1999 there is uncertainty about how influential it has been on this trend in relation to other factors such as the wider economic recovery. The implementation of up to date policies in the new Local Plan would help address unemployment and help to bring about reduced unemployment rates.
Diversification in Rural Areas - Agriculture is in decline across the District and there is little evidence of diversification.	The saved Business and Industry Policy B1 in the adopted Kirklees UDP recognises that one measure to address unemployment across the District would be to accommodate agricultural development and diversify the rural economy. Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy.
	However, the UDP was adopted in 1999 and since then agriculture remains in decline across the District and rural diversification is limited. Although paragraph 28 of the NPPF supports the rural economy by encouraging the sustainable growth and expansion of all types of business and enterprise in rural areas and promoting the development and diversification of agricultural and other land-based rural businesses, the implementation of up-to-date Local Plan policies specifically relating to agriculture and rural diversification in Kirklees would give more certainty in relation to how this issue will be addressed.
Housing Provision (Supply) - There is a need to ensure sufficient land is available to meet future housing requirements within Kirklees.	The saved UDP Policy H1 states that one way in which the housing needs of the District will be met is by "providing land to meet the requirement for a range of house types by allocating sites of various sizes and in different types of locations having regard to local patterns of demand". Although the UDP contains proposal maps which provide sites for new housing requirements, it is recognised that these locations are based on the outdated <i>Strategic Guidance</i> and that updated policies/site allocations are required to reflect the latest projected housing requirements. Without the implementation of the new Local Plan it is therefore uncertain whether there will be sufficient land allocations to develop new housing.

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
Housing Provision (Affordable Housing) - There is a need for affordable housing across Kirklees due to the fact average earnings are below regional and national averages.	The saved UDP Policy H1 makes provision for affordable housing; therefore even without the new Local Plan this issue is being addressed to some extent by other policy. However, since the adoption of the Unitary Development Plan there has been a new assessment of the affordable housing required across the District. In the 2012 Strategic Housing Market Assessment for Kirklees the level of affordable housing need in the District was estimated to be 1,457 houses per annum. This is greater than the figure set out in the Council's Housing Strategy and the Housing Association Development Strategy i.e. 3,800 additional units of affordable accommodation within the first five years of the UDP and 6,900 over ten years. It is therefore unlikely that affordable housing needs will be adequately addressed without the implementation of up-to-date policies within the Local Plan that reflect the most recent evidence.
	Without the Local Plan, an ongoing lack of affordable housing is likely to lead to many people being priced out of the market and the population profile of the District may become distorted. This may have secondary effects on the economy, reducing the District's ability to attract key workers in particular. Therefore, although policies are already in place, the implementation of updated policies in the new Local Plan would provide more certainty in relation to how affordable housing provision will be addressed locally.
Housing Provision (Regeneration) - There are a large proportion of properties which are either unfit or in a poor state of repair across the District.	Saved UDP Policy H1 states that the housing needs of the District will be met by "improving existing housing particularly through the designation of renewal areas and areas for housing improvement [Policy H3]". In addition, saved UDP policy H2 also refers to the fact that Regeneration Areas have been identified in the proposal maps. Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy. However, UDP policy H3 which is referred to in policy H1, and which identified areas for housing improvement, was not saved beyond 2007. In addition, the UDP policies have been in place since 1999, over which time the trend has not been reversed.
	Without the implementation of updated policies within the Local Plan to identify opportunities for housing regeneration, and bring local policy in line with the NPPF, it is therefore unlikely that the issue of housing stock repair will be addressed fully across the District.
Housing Provision (Mix) - There is the need for a mix of housing types including social rented housing and provision in rural communities.	UDP Policy H7 concerning the provision of a mix of housing types was not saved beyond 2007 and was replaced by guidance in the form of PPS 3: Housing, which has now itself been replaced by the NPPF. Therefore, there is limited existing local policy for Kirklees concerning the provision of an appropriate mix of housing. The NPPF identifies that local planning authorities should, "plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)" (paragraph 50).
	Although the NPPF encourages a mix of housing development, it is anticipated that this requirement would be implemented at the local level through an up-to-date policy in the new Local Plan. This would provide more certainty regarding the issue being addressed.

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
Service Accessibility - Promote vibrant inclusive communities with good accessibility to services, education and employment.	There are no policies in the UDP that relate directly to the accessibility of services; however the NPPF encourages the development of vibrant communities and states that "supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being" (paragraph 7) is key to the realisation of sustainability.
	The NPPF may therefore have a positive influence on promoting more vibrant and inclusive communities in Kirklees District in the absence of the Local Plan; however the issue would be better addressed by implementing specific and up-to-date policies in the new Local Plan.
	In the absence of the new Local Plan, ongoing poor provision and use of public transport may cause the more rural parts of the District to become increasingly isolated in terms of access to employment opportunities and community services and facilities, whilst high levels of car use will increase levels of air pollution and noise disturbance.
Rural Accessibility - Many rural areas suffer from a lack of facilities creating problems of accessibility.	There are no policies in the UDP that relate directly to service accessibility in rural areas. However, the NPPF states that "planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development" (paragraph 28). Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy; however this is unlikely to be as effective as if specific and up-to-date policies were included in the new Local Plan to address the issue.
Sport and Recreation - The opportunities for sport and recreation within the District are low when compared to the population.	The saved UDP policy R6 states, "when development is proposed which gives rise to a need for public open space, measures should be included to ensure that this need can be satisfied by establishing new areas of public open space, either on site or in a readily accessible location, or by upgrading existing public open space." The NPPF also recognises the need to provide enough recreational facilities to meet the needs of communities and states that "access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision" (paragraph 73). Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy; however this is unlikely to be as effective as if specific and up-to-date policies were included in the new Local Plan to address the issue.

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
Health - There is a need to promote healthy lifestyles and reduce health inequalities within Kirklees.	There are no policies in the adopted UDP that relate directly to promoting healthy lifestyles in Kirklees. However, the NPPF states that, "local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being" (paragraph 171).
	Although the NPPF seeks to improve health and wellbeing, the implementation of Local Plan policies specifically relating to health and wellbeing in Kirklees would provide more certainty in relation to how health issues will be addressed.
Fear of Crime - The fear of crime often fuelled by anti-social behaviour is seen as a problem across Kirklees as a whole.	Saved UDP policy BE23 states that new developments should incorporate crime prevention measures. In addition, the NPPF states that planning policies and decisions should aim to promote "safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion" (paragraph 69). Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy and the baseline information on crime shows that sustained reductions over the past few years have been achieved and levels of recorded crime in Kirklees continue to decrease. However, it is not clear to what extent this can be attributed to policy and how much other factors will have driven the changes. Nevertheless, in the absence of the new Local Plan, the trend is likely to continue as at present.
Biodiversity - Kirklees has sites of European, national, regional and local ecological significance. The national and international concerns over declining biodiversity are reflected locally. Tree cover within the District is low particularly south of Huddersfield and North Kirklees.	Saved UDP policy NE3 states that "development proposals which would affect a site of wildlife significance will not normally be permitted unless provision can be made to maintain the site's role for nature conservation". In addition, the NPPF (paragraph 7) states that the planning system has a key environmental role including, "contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity" Therefore, even without the new Local Plan this issue is being addressed to some extent by other policy. However, given the current pressures for growth and development within the District, an up-to-date local policy reflecting the latest national guidance would be beneficial to help to avoid adverse impacts resulting from ongoing pressure on ecological sites.
	There are no policies in the UDP or NPPF that specifically address the lack of tree cover.

Key Sustainability Issue

also a distinctive local feature.

Heritage - Kirklees has a large number of designated conservation areas and the greatest number of listed buildings of any authority in the north of England. The local character of Kirklees is

Likely evolution of the issue without implementation of the Local Plan

Saved UDP policy BE5 addresses the preservation and enhancement of conservation areas. The UDP policy relating to Listed Buildings specifically (BE4) was replaced by PPG 15: Planning and the Historic Environment, which was itself subsequently replaced by the NPPF. Paragraph 17 of NPPF states that the planning system should "conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations".

Therefore, whilst these policies make provision for the protection of listed buildings and conservation areas, it is considered that the implementation of more specific policies for Kirklees through the new Local Plan would provide greater protection for heritage assets at the local level.

Transport - A high proportion of people travel to and from work by car which partially reflects limited public transport provision within rural parts of the District. Employment uses also rely on the transport network. The consequences of transport are also a significant issue, with air quality management areas being declared within Kirklees.

Saved UDP policy T1 states that priority will be given to "satisfying the needs of all sections of the community through an effectively integrated transport system with emphasis on improving public transport and encouraging a modal shift away from travel by private car". In addition, paragraph 17 of the NPPF states that one of the core planning principles that should underpin plan making and decision making includes action to "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable".

Although Policy T1 and the NPPF therefore address this issue to some extent, the implementation of up-to-date Local Plan policies specifically relating to public transport in Kirklees, would provide more certainty in relation to how public transport issues will be addressed locally.

Climate Change Adaptation and Mitigation -There is the need to address issues related to climate change and low carbon development. Also, to reduce pollution and emissions including

those from transport methods.

The Strategic Flood Risk Assessment (November 2008) carried out within Kirklees and the more recent Environment Agency flood map updates have highlighted many areas which are liable to flooding. The effects of climate change may increase the incidence of flooding within the District.

There are no saved policies within the UDP that specifically address the effects of climate change and mitigation. However, paragraph 94 of NPPF states that" local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations".

There is a need for revised policies relating to flooding across the District to reflect the findings of The Strategic Flood Risk Assessment (November 2008) and latest Environment Agency flood maps. Without the implementation of updated Local Plan polices, existing and new developments may be at greater risk of flooding.

Key Sustainability Issue	Likely evolution of the issue without implementation of the Local Plan
Resource Efficiency - There is a need to respond to the international and national pressures for increased recycling and re-use of waste, reduction in waste to landfill, reduced energy demand, improved energy efficiency and the use of low carbon and renewable resources. Mineral extraction needs to be managed taking into account existing permitted reserves and the need for additional supply. Efficient use of Land - Development pressures across Kirklees need to be managed to ensure	The current waste policy in Kirklees is contained National Planning Policy for Waste, which would continue to apply in the absence of the Local Plan. It states that 'all local planning authorities should have regard to its policies when discharging their responsibilities to the extent that they are appropriate to waste management'. The NPPF also places a duty on the planning system to "use natural resources prudently, minimise waste and pollution" (paragraph 7). As can be seen from the baseline information, the amount of Local Authority Collected Waste (LACW) arising across Kirklees has risen over the last year, after falling previously, although recycling schemes are in place. Therefore, while National Planning Policy for Waste and the NPPF would continue to apply, in the absence of the new Local Plan it is possible that waste arisings would continue to increase. Saved UDP policy DL1 states that "derelict and neglected land will be brought into beneficial use to assist in the regeneration of the District" and current trends show that a large amount of new housing developments are on redeveloped or brownfield land. Whilst this issue is therefore being addressed to
Water Quality - The majority of Kirklees waterbodies (rivers, lakes, estuaries, coastal and groundwaters) are classed as moderate and are failing to meet the requirements of the Water Framework Directive.	some extent, it is important to ensure that there is brownfield land allocated for further development e.g. through site allocations within the new Local Plan, in order to address increasing development pressures. The UDP states that the current policy relating to water quality in Kirklees is contained in PPS23: Planning and Pollution Control; however this has now been cancelled. New local policy guidance is therefore required to ensure that water quality across the District is improved.

4 SA Findings for the Residential Site Options

- 4.1 This section presents the SA findings for the residential site options that were considered by Kirklees Council for allocation in the Local Plan.
- 4.2 A total of 859 reasonable alternative residential site options have been subject to SA by LUC on behalf of the Council. A set of assumptions was devised to ensure that this large number of reasonable site options could be appraised consistently these assumptions are presented in **Appendix 4** (see Table A4.1).
- 4.3 The likely effects of the residential site options are summarised below in relation to each SA objective. Particular consideration has been given to the likely significant effects identified (both positive and negative), in line with the requirements of the SEA Regulations. Where relevant, effects are classified as short, medium or long-term. Consideration is also given to potential mitigation measures that could reduce or offset the negative effects identified, including mitigation that may be provided by policies in the emerging Local Plan.
- 4.4 The SA scores for all of the residential site options are presented in **Table 4.1** at the end of this chapter, and the detailed SA matrices for the residential site options are available in the separate **Annex 1**.
- 4.5 **Annex 1** also includes the maps that are referred to throughout this section. Those maps show the locations of the site options that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives.
- Due to the large number of site options considered, it is not possible to describe all of the individual sites that are likely to have positive or negative effects on particular SA objectives. Therefore, the summary focuses on the key messages coming out of the SA and identifies the key issues of relevance to the Council's decision making regarding which sites to allocate for housing development in the Local Plan (as described in **Chapter 2**, this summary was provided to the Council before the Draft Local Plan was finalised, in order that the findings could be used to inform decision making). Along with the SA findings, other factors were also taken into account by the Council including the deliverability of the sites and how they fit into the overall spatial strategy. Information about the reasons for selecting or rejecting each residential site option is provided in **Appendix 5**.

Summary of effects by SA objective

SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible

- 4.7 The location of the residential sites allocated in the Local Plan will not affect the number and range of employment opportunities available in Kirklees. However, if residential sites are well-located in relation to employment nodes and are well-connected to those areas via sustainable modes of transport, the people living there will be more easily able to access jobs. This will be particularly beneficial for people without a car. While employment opportunities will also be located outside of the identified employment nodes⁹, these provide an indication of the key employment areas in the District.
- 4.8 The appraisal of the residential site options against this SA objective was informed by the heatmapping work which was undertaken for Kirklees Council, specifically the information about journey times via sustainable modes of transport from each residential site option to the nearest existing employment node. The locations of <u>potential</u> employment site options being considered

⁹ Employment sites with over 1,000 employees as shown in the LTP3 dataset, which was used in the heatmapping work by Kirklees Council.

for allocation in the Local Plan were not taken into account during the appraisal of residential site options at this stage, as there is currently no certainty about whether or not those employment sites will eventually be allocated. The relative proximity of the preferred sites for employment and residential development will be assessed during later stages of the SA once preferred sites have been identified by the Council.

- 4.9 Significant positive effects alone were identified in relation to 349 of the 859 residential site options (or 41%), as those sites are located mainly or entirely within 20 minutes travel time of an employment node via sustainable modes of transport. A further 94 sites would have significant positive effects in relation to part of the site, but either minor positive, negligible or negative effects were likely for the rest of the site. This was because levels of access to employment nodes were very variable within those sites but in all cases at least part of the site was found to be within 20 minutes of an employment node.
- 4.10 The locations of the sites that would have entirely or partly significant positive effects on this SA objective are shown in **Map R1**. It can be seen that the residential site options that have the best levels of access to employment nodes are almost exclusively located in the north and east of the District. This is unsurprising as those are the most urban areas of the District where the employment nodes would be expected to be located. In the south western part of the District, away from the main urban areas of Huddersfield, Cleckheaton and Dewsbury, there are no residential site options that are within 20 minutes of an employment node. While there will be other opportunities for accessing jobs outside of those employment nodes, locating residential development in and around the main urban areas in the north and east of Kirklees will mean that people have generally easier access to jobs via non-car based modes of transport, with journey times likely to be shorter.
- 4.11 Ninety-seven (11%¹⁰) of the residential site options would have an entirely or partly significant negative effect on this SA objective, as either all or part of the site is more than an hour away from an employment node via sustainable modes of transport. The locations of those sites are shown in **Map R2**. While there are not many residential site options located within the more rural areas of Kirklees (in the south west), a number of the sites that are more than 20 minutes from an employment node are located in that area. However, even in the more urbanised area in the north there are a number of sites that would have a significant negative effect on access to employment. Therefore, even for sites that are in the most urbanised parts of Kirklees, it will be important to ensure that adequate sustainable transport links exist to provide residents at those sites with the means to travel to job opportunities.
- 4.12 The remainder of the residential site options would have either minor positive, negligible or minor negative effects on this SA objective, as they are between 20 and 60 minutes from the nearest employment node via sustainable transport.

SA objective 2: Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship

4.13 The location of the residential sites that are allocated in the Local Plan will not affect the success of the local economy. While new housing development may result in job creation during the construction phase, this will not be influenced by the location of the development. Housing development may also affect the size and location of the local workforce; however this is considered separately under SA objective 1 above. Therefore, the effects of all of the 859 residential site options on SA objective 2 are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 3: Ensure education facilities are available to all

4.14 The effects of new residential development on this SA objective will depend to some extent on the availability of school and college places to serve the growing population; this will depend in part on whether new places are provided as part of the new housing developments, which is unknown at this stage. While new schools may be allocated in the new Local Plan, their potential locations

¹⁰ Where figures have been presented as a percentage figures may have been rounded up meaning the sum of percentages may not be 100%.

- were not taken into account in the appraisal of residential site options against this SA objective as there is not enough certainty at this stage about their delivery.
- 4.15 Effects on this SA objective will also depend on how accessible existing schools and colleges are from residential site options, although there are uncertainties as the effects will depend on there being capacity at those schools and colleges to accommodate new pupils. Information about access to existing schools was taken from the accessibility heatmapping work that was undertaken for Kirklees Council. The heatmapping work assessed the journey times from each residential site option to primary and secondary schools, as well as further education facilities, via sustainable modes of transport.
- 4.16 Potential significant positive effects alone were identified in relation to 361 of the 859 options (42%) as they are mainly or entirely within 0-15 minutes journey time (via non-car based modes of transport) of a primary school and 0-20 minutes of a secondary school. Some are also within 30 minutes travel time of a further education facility. A further 119 sites (14%) would have significant positive effects in relation to part of the site, but minor positive, negligible or negative effects for the remainder of the site as levels of access to education facilities were variable within different parts of those sites. The locations of the sites that would have entirely or partly significant positive effects on this SA objective are shown in **Map R3**. Unsurprisingly, levels of access to schools and colleges were best for the potential residential sites in the more urbanised areas of the District, i.e. in and around Huddersfield, Cleckheaton and Dewsbury and smaller towns such as Holmfirth and Skelmanthorpe.
- 4.17 Only 60 site options (7%) could have a significant negative effect on access to education as they are more than 30 minutes from a primary school and more than 40 minutes from a secondary school. Seventeen sites are likely to have entirely significant negative effects, while 43 sites could have a mixture of significant negative and other effects, where levels of access to education vary significantly within the site. The locations of those site options are mapped in **Map R4**. The sites that are likely to have a significant negative effect in relation to education are generally those that are located outside of the main urban centres. Levels of access to primary schools are generally better than for secondary schools, although Department for Transport guidance¹¹ indicates that journey times to primary schools would be expected to be shorter than for secondary schools.
- 4.18 Therefore, allocating residential sites in the main urban areas of the District will help to provide the best levels of access to schools, particularly for those without a car; however the effects of the allocations on this objective will depend largely on whether nearby schools have capacity and whether new schools and school places are provided as part of the development proposals.

SA objective 4: Improve the health of local people and ensure that they can access the health and social care they need

- 4.19 The location of residential sites that are allocated through the Local Plan will not affect the number or distribution of healthcare facilities; however where existing healthcare facilities are easily accessible from housing sites there will be positive effects on residents' ability to access healthcare.
- 4.20 The appraisal of the residential site options against this SA objective has been based on the heatmapping work undertaken on behalf of Kirklees Council, in particular the assessment of each site's accessibility to healthcare facilities, i.e. GP surgeries or hospitals.
- 4.21 Of the 859 residential site options in Kirklees, 95 (11%) are likely to have a significant positive effect alone on this SA objective as they are within 0-15 minutes journey time (via non-car based modes of transport) of a GP and are also within 0-30 minutes of a hospital. A further 48 (6%) of the site options are likely to have a significant positive effect as part of a mixed effect overall, where levels of access to healthcare vary within the same site. The locations of the sites that would have entirely or partly significant positive effects on health are shown in Map R5. It can be seen that the sites with the most positive effects on this SA objective are clustered around central areas of Huddersfield and Dewsbury and to a lesser extent Cleckheaton. This reflects the location of the District's hospitals. Considering only access to GPs, levels of accessibility are much

¹¹ Department for Transport (October 2014) Accessibility Statistics: Guidance

- better as there are many more GPs than hospitals, and they are more widely distributed throughout the District.
- 4.22 Only 25 (3%) of the residential site options are likely to have a significant negative effect alone on health as they are more than 30 minutes from a GP as well as being more than 60 minutes from a hospital. An additional 45 (5%) sites are likely to have a significant negative effect as part of an overall mixed effect, as levels of access vary within the site but at least part of the site is more than 30 minutes from a GP as well as being more than 60 minutes from a hospital. The locations of those sites are shown in **Map R6**. The sites with the least good access to healthcare facilities are generally those that are located in the more rural areas of the District, in the south and west, although there are a number of sites around the periphery of the urban areas in the north of Kirklees that also have relatively poor access to healthcare.
- 4.23 Housing sites within or adjacent to either of the two Air Quality Management Areas (AQMAs) that have been declared in Kirklees could negatively affect the health of residents as result of exposure to poor air quality. Seven (0.8%) of the residential site options are either within or are directly connected by road to an AQMA and so could have a minor negative effect for that reason (in some cases, that minor negative effect contributes further to an already significant negative effect identified on the basis of access to healthcare). Those seven sites are: H87, H100, H118, H642, H1656, H1661 and H1667. The two AQMAs in Kirklees are located in the north of the District: one covers two sections of the Leeds Road A62 (in the vicinity of the junctions with the A6107 Bradley Road, and with the A644) and the other is along part of the Huddersfield Road A644. If sites in those areas are allocated for residential development the people living there may be adversely affected. In addition, the extra traffic resulting from the development could compound those air quality issues. Therefore, if sites in those areas are taken forward in the Local Plan it is particularly important that mitigation is built into the Local Plan policies and specific proposals for the sites, in relation to the provision of sustainable transport links to try to discourage car use by residents.

SA objective 5: Protect local amenity including avoiding noise and light pollution

- 4.24 Where new residential development is proposed within close proximity of sensitive receptors such as existing houses, schools or hospitals there may be negative effects on amenity as a result of increased noise and light pollution. Such effects would be largely short term, during the construction phase, but there may be ongoing increases in noise associated with traffic movements and general human activity. New residential development within close proximity of major roads or railways or industrial areas may result in noise pollution affecting residents of the new housing over the longer term.
- 4.25 No likely positive effects, either minor or significant, were identified in relation to this SA objective.
- 4.26 Of the 859 residential site options, 320 (37%) were identified as having a likely significant negative effect on this SA objective either because they are surrounded by existing residential development or other sensitive receptors, or because they are directly adjacent to an 'A' road, motorway or railway line or an industrial area. The locations of those sites are mapped in **Map R7**, which also shows the locations of key transport routes which can affect the amenity of nearby residents.
- 4.27 The sites that are likely to have a significant negative effect are mainly clustered around the most heavily urbanised areas of the District, including in Huddersfield, Holmfirth, Batley, Cleckheaton and Dewsbury. Proximity to the M62 which mostly runs along the northern boundary of the District is also a key factor, with sites in that area of the District being particularly likely to be adversely affected in relation to amenity.
- 4.28 A further 534 (62%) of the site options could have a minor negative effect, particularly over the short term during the construction phase, as they are not surrounded by existing residential development or other sensitive receptors but have such receptors within 100m.
- 4.29 Therefore, when considering which site options to allocate in the Local Plan, proximity to key roads (in particular the M62) should be taken into account and appropriate mitigation will need to be built into the plan and specific development proposals for the sites, e.g. noise buffers.

 Measures such as enforcing the use of good practice construction techniques may help to reduce

the short-term impacts associated with construction; however there is inevitably a balance to be struck between locating residential development in the urban areas of Kirklees that have the best access to jobs, services and facilities and the need to protect the amenity of residents.

SA objective 6: Retain and enhance access to local services and facilities

- 4.30 The location of the residential sites allocated in the Local Plan will not directly affect the number or range of services in a particular location (although a large scale housing development could potentially stimulate the provision of new services); however the location of housing sites could affect this objective by influencing the ability of new residents to access existing services and facilities.
- 4.31 The appraisal of the residential site options against this SA objective has been based on the heatmapping work undertaken on behalf of Kirklees Council, in particular the assessment of each site's accessibility to local and town/district centres. The local and town/district centres have been used as a proxy indicator of access to services, because they have been classified on the basis of what services and facilities are available within each centre (local centres have fewer than town/district centres).
- 4.32 Of the 859 residential site options, 72 (8%) are likely to have either an entirely or partly significant positive effect on access to services because either all or part of the site (where levels of access vary) is within 0-5 minutes journey time (via non-car based modes of transport) of a local centre and are within 0-15 minutes of a town/district centre. The locations of those 72 sites are shown in **Map R8**.
- 4.33 Eighty-four (10%) of the residential site options are likely to have either an entirely or partly significant negative effect on this SA objective as they are either entirely or partly more than 15 minutes from a local centre and more than 30 minutes from a town/district centre. The locations of those sites are shown in **Map R9**.
- 4.34 It can be seen that the sites with the best levels of access to services and facilities are unsurprisingly located in and around the main urban areas, i.e. Huddersfield, Cleckheaton and Dewsbury. While locating residential development in the main urban areas is likely to ensure that residents have the best level of access to existing services and facilities, the effects of site allocations on this SA objective will also depend in part on the provision of new services and facilities. This may be most viable when larger sites are allocated. It is also important to ensure that existing services and facilities do not become overloaded by increased demand if large-scale residential development takes place without the provision of new services and facilities.

SA objective 7: Make our communities safer by reducing crime, anti-social behaviour and the fear of crime

4.35 The effects of new housing developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within the housing sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of housing sites allocated through the local Plan; rather they will be determined through the detailed proposals for each site. Therefore, the effects of all of the 859 residential site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 8: Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage

- 4.36 The effects of the residential sites allocated in the Local Plan on this SA objective will depend in part on the provision of open space, green infrastructure or sports facilities within the new development, which is unknown at this stage. However, proximity to existing recreational facilities and areas of open space will also influence effects, particularly if these facilities are within walking distance (taken to be 600m).
- 4.37 Of the 859 residential site options, almost all (855) are within 600m of three or more areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways and are likely to have a significant positive effect on SA objective 8. The locations of these sites are shown in Map R10. Only four site options (H238, H275, H639 and H153) were not within 600m of at least three

- areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways. With the exception of one site (H639), those sites are located in the more rural areas of the District.
- 4.38 Where site options include existing open space, recreation facilities or Public Rights of Way there is also likely to be a significant negative effect as those assets may be lost due to development, although this effect is uncertain as it cannot be known at this stage whether the recreation asset would be lost or whether it could be incorporated into the housing proposals. 362 (43%) of the residential sites could have a significant negative effect for this reason. All of these sites except one (H153) could also have significant positive effects because of their proximity to other assets that could be used by residents, resulting in mixed effects overall. The locations of those sites are also shown in **Map R10** and it can be seen that they are distributed broadly across the District with no particular pattern.
- 4.39 Therefore, while levels of access to recreation and leisure facilities are generally very good for almost all of the residential site options, careful consideration will need to be given to the design and layout of the sites that are allocated to ensure that features such as Public Rights of Way that cut through sites are incorporated into the development, in order to avoid negative effects resulting from their loss. Alternatively, consideration should be given to whether it is possible to replace those features with equivalent or better provision elsewhere.

SA objective 9: Ensure all people are able to live in a decent home which meets their needs

- 4.40 All of the potential residential sites are expected to have positive effects on this objective, due to the nature of the proposed development ensuring provision of sufficient homes to meet need in the District. It is also assumed that new housing developments will include an appropriate proportion of affordable housing (subject to appropriate housing policies being developed in the Local Plan and assessed separately). Larger sites will provide opportunities for developing greater numbers of new homes, and therefore are likely to have a significant positive effect. Based on the range of sizes of the potential sites for residential development being considered by Kirklees Council, larger sites are taken to be those over 5ha.
- 4.41 Of the 859 residential site options, 148 (17%) are larger than 5ha in size and will have a significant positive effect on SA objective 9, and their locations are shown in **Map R11**. Those sites are spread throughout the District. The remainder of the residential site options would have a minor positive effect as they are less than 5ha in size.
- 4.42 The total number of homes to be provided through the Local Plan will be the same regardless of whether a higher number of smaller sites, or fewer larger sites, are allocated. However, consideration should be given to the wider benefits that may be achieved through the development of larger sites, such as the potential to incorporate the provision of new services and facilities. Equally, it will be important to ensure that larger sites do not result in excessive increases in pressure on existing infrastructure in those areas, something that may be more easily avoided through the allocation of a higher number of smaller sites.
- 4.43 No negative effects, minor or significant, were identified for any of the residential site options in relation to this SA objective.

SA objective 10: Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport

- 4.44 How well connected housing sites are to services, facilities and employment opportunities by sustainable modes of transport will affect the extent to which residents are able to make use of non car-based modes of transport day to day. It is possible that new transport links such as bus routes or cycle paths may be provided as part of large-scale housing developments but this cannot be assumed.
- 4.45 The assessment of residential site options against this SA objective was informed by the heat mapping work that was carried out on behalf of Kirklees Council. Each site option was assessed in terms of its accessibility to eight different features¹² via sustainable modes of transport, with the

¹² Employment nodes, primary schools, secondary schools, further education facilities, GPs, hospitals, local centres and town/district centres.

outputs being mapped on a scale of green to red. Sites are mapped as green (and therefore considered as having good access) for the feature in question when they are within the journey time standards set out by the Department for Transport¹³, which vary for each of the eight features. Therefore, the more features that a site is classed as 'green' for, the more easily residents will be able to use sustainable transport to undertake day to day journeys.

- 4.46 Of the 859 residential site options, 617 (72%) are likely to have a significant positive effect on this SA objective as they are mapped as 'green' for at least four of the eight features. The locations of those sites are shown in **Map R12**.
- 4.47 Only 37(4%) of the residential site options are likely to have a significant negative effect as they are not mapped as 'green' for any of the eight features assessed in the heatmapping work. The locations of those sites are shown in **Map R13**.
- 4.48 Unsurprisingly, opportunities to make use of sustainable modes of transport day to day are likely to be highest where residential sites in the main urban areas are allocated, i.e. around Huddersfield, Cleckheaton and Dewsbury. The site options in the south and east are likely to offer less good opportunities and may result in higher levels of increased car traffic in the District; however these type of effects will also be influenced by the extent to which sustainable transport infrastructure is incorporated into the new development. This may be more viable when larger sized sites are allocated.

SA objective 11: Secure the efficient and prudent use of land

- 4.49 Where development takes place on greenfield land or areas of high quality agricultural land it is a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land.
- 4.50 Only seven (0.8%) of the residential site options are both relatively large (over 5ha) and entirely or mainly located on brownfield land, and therefore are likely to have a significant positive effect. The locations of those sites are shown in **Map R14**. While opportunities to redevelop brownfield sites on a large scale are therefore relatively limited, there are more extensive opportunities to redevelop small brownfield sites.
- 4.51 Of the 859 residential site options, 142 (17%) are likely to have a significant negative effect, because they are relatively large in size (over 5ha) and are entirely or mainly on greenfield land. In many cases, this land is of Grade 2 or 3 agricultural quality. The locations of those sites are shown in **Map R15** and can be seen to correlate broadly with the extensive areas of Grade 3 agricultural land which are mainly located in the north, central areas and east of the District. Therefore, if housing development is located in the southern areas of Kirklees it will be easier to avoid the loss of high quality agricultural land. However, this needs to be balanced with the wider sustainability disadvantages of locating development further from the main urban centres.
- 4.52 If brownfield sites in any part of the District are allocated for development, consideration should be given to the extent to which it may be possible to make use of onsite buildings and materials.

SA objective 12: Protect and enhance the character of Kirklees and the quality of the landscape and townscape

- 4.53 A small area in the south of Kirklees lies within the Peak District National Park. Development within that part of the District could therefore have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known. Twenty (2%) of the 859 site options are within 500m of the National Park and so could have a significant negative effect on SA objective 12 for that reason.
- 4.54 Outside of designated landscape areas, where development will take place on greenfield land, the character of the local environment is more likely to be affected and larger sites are more likely to have a more prominent impact than smaller sites. However, effects are uncertain as they will depend on the design of new development and the quality of the landscape. Where a brownfield site is redeveloped it is likely that the overall character and appearance of the site will be improved as a result of new development, which is assumed to be of high quality, and this may

¹³ Department for Transport (October 2014) Accessibility Statistics: Guidance

- benefit the appearance of the landscape/townscape. However, this is uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously. The design of new residential development is unknown at this stage in the planning process, as it will only be defined when planning applications are put forward.
- 4.55 Of the 859 residential site options, 141 (16%) are large sites (over 5ha) and are entirely or mainly on greenfield land and therefore may have a significant negative effect on this objective. A further 625 sites (73%) may have a minor negative effect as they are small in size but are entirely or mainly on greenfield.
- 4.56 Only 83 sites (10%) are on brownfield land and therefore could have a minor positive effect. No likely significant positive effects were identified in relation to any of the residential site options.
- 4.57 The locations of the sites that could have a significant negative effect on the landscape are shown in **Map R16**, which also shows the location of the Peak District National Park. It can be seen that relatively few site options are in close proximity of the National Park, and therefore this factor is not the key determinant of impacts on the landscape. However, if any of those sites near to the National Park are eventually allocated in the Local Plan it will be particularly important to ensure that mitigation is built into the Local Plan policies and the detailed proposals for the sites to avoid adverse impacts. This may involve appropriate design or screening. Information from the emerging Kirklees Landscape Character Assessment has also been taken into account in the SA and should also inform the Council's decision making regarding which sites to take forward, as well as specific proposals for the sites that are eventually allocated.

SA objective 13: Conserve and enhance the historic environment, heritage assets and their settings

- 4.58 Judgements about the likely effects of the residential site options on the historic environment have been based on information provided by Historic England (formerly English Heritage). Each site has been rated by Historic England as either red, orange, yellow or green based on what it considers to be the likely effects on the historic environment of developing the site in question. Those judgements have been converted directly into SA scores as described in the SA assumptions in **Appendix 4** (Table A4.1).
- 4.59 Only three (0.3%) of the residential site options were rated by Historic England as 'red' on the basis that the development of the site is likely to result in substantial harm to a designated heritage asset. Those sites were therefore identified in the SA as having a potential significant negative effect on this SA objective. A further 22 (3%) sites could have a minor negative effect as they were assessed by Historic England as 'yellow', meaning that the allocation of the site could impact on a designated heritage asset, but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment.
- The locations of the sites that could have significant and minor negative effects on SA objective 13 are shown in Map R17. Most are located in the more urban areas of the northern part of Kirklees, in and around Huddersfield, Batley and Cleckheaton, where there is a denser concentration of heritage assets such as listed buildings in comparison to the rural areas. The three sites with potential for significant negative effects (H84, H262 and H1792) are all within close proximity of the Registered Battlefield at Adwalton in the north of Kirklees. However, in all cases the potential effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).
- 4.61 A further 284 (33%) sites could have uncertain effects on SA objective 13 as they were identified as 'orange' as their likely effects on the historic environment are uncertain. The remaining 550 (64%) sites were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those 550 sites are therefore most likely to have a negligible effect on this SA objective, although this is again uncertain.
- 4.62 No likely positive effects (minor or significant) were identified in relation to any of the residential site options.

4.63 If the Council is considering allocating any of the sites that have been identified as having potential negative effects on the historic environment, the detailed information provided by Historic England about the heritage features that could be affected by development should be drawn on, and consideration given to the potential for mitigation. Any mitigation that is required should be included in the relevant Local Plan policies relating to the historic environment generally, but also specifically to the allocated sites in question.

SA objective 14: Maximise opportunities to protect and enhance biodiversity and geodiversity

- 4.64 Housing sites that are within proximity of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, trampling etc. Conversely, there may be opportunities to promote habitat connectivity if housing developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists as the distance and pathways across which effects might occur is not the same for all types of habitats and species, and appropriate mitigation may avoid adverse effects and may even result in beneficial effects.
- In addition to potential effects on nearby designated sites, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment (as site surveys are not undertaken). This would need to be determined once more specific proposals are developed and submitted as part of a planning application. Distances of 250m and 1km have been used as an indication of proximity, as there are no standard distance thresholds available and it is recognised that the distance over which effects may occur vary between habitats and species and the types of effect being considered. This level of detail cannot be determined as part of the SA. In relation to impacts on European sites, the findings of the Habitats Regulations Assessment (HRA) will be taken into account in the SA as they become available.
- 4.66 Of the 859 residential site options, 166 (19%) were identified as having a potentially significant negative effect on this SA objective as they are within 250m of one or more designated biodiversity or geodiversity sites. The locations of those site options are mapped in Map R18. Most of the sites that could have a significant negative effect on biodiversity are located outside of the main urban areas, reflecting the location of the majority of the District's designated nature conservation sites. Therefore, focussing most development in the main urban areas of Kirklees may help to steer development away from designated sites. However, urban areas can still harbour valuable biodiversity and the need to incorporate mitigation for impacts on non-designated features should be addressed by the Council as it prepares the relevant Local Plan policies.
- 4.67 A further 458 (53%) residential site options were identified as having a potential minor negative effect on this SA objective as they are between 250m and 1km from a designated biodiversity or geodiversity site. The remainder of the site options (233 or 27%) are most likely to have a negligible effect although this is uncertain until the design and layout of the sites are known, as there may be opportunities to incorporate biodiversity enhancements.
- 4.68 No likely positive effects (minor or significant) were identified in relation to any of the site options.

SA objective 15: Reduce air, water and soil pollution

- 4.69 The location of housing developments within Kirklees would not have a direct effect on levels of soil or water pollution, which would be influenced by factors such as whether there is capacity at the District's sewage treatment works to treat the additional wastewater generated by the overall scale of development proposed (this will be considered separately in relation to the Local Plan policies addressing the quantum of development that will be provided in Kirklees). Potential impacts on soil are under SA objective 11 above, which considered potential impacts of residential site options on best and most versatile agricultural land. Therefore, the effects of almost all of the 859 residential site options on this SA objective are negligible, with only 0.8% of sites having a likely significant negative effect in relation to air pollution as described below.
- 4.70 Development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic from population growth in those areas

- could compound existing air quality problems. As described under SA objective 4: health above, those AQMAs are located in the north of the District one covers two sections of the Leeds Road A62 (in the vicinity of the junctions with the A6107 Bradley Road, and with the A644) and the other is along part of the Huddersfield Road A644.
- 4.71 Seven (0.8%) of the residential site options were identified as likely to have a significant negative effect on this SA objective as they are either within or directly connected by road to an AQMA. The location of those sites, and the AQMAs, are shown in **Map R19**. As noted under SA objective 4 above, if sites in these areas of the District are allocated for development it will be particularly important to ensure that mitigation is built into the Local Plan and specific proposals for the sites, in relation to the provision of sustainable transport links to reduce car use amongst residents.
 - SA objective 16: Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people
- 4.72 The development of new housing on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. National Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of lower flood risk (flood zone 1 and 2) but would require an exception test in flood zone 3a, and is unsuitable in flood zone 3b (areas with higher levels of flood risk).
- 4.73 While new development in any location may offer good opportunities to incorporate SuDS, and therefore have a positive effect on reducing flood risk, this would depend on the design of the proposed development and not on the location of the site.
- 4.74 Twenty-two (2.6%) of the residential site options are likely to have a significant negative effect on this SA objective as they are entirely or mainly on greenfield land that is within flood zones 3a or 3b. The locations of those sites are mapped in **Map R20**, which also shows the location of flood zones 2 and 3 in Kirklees. It can be seen that the parts of the District that are at the highest risk from fluvial flooding are in the north and centre of Kirklees, around the rivers Colne (north-east of Huddersfield) and Calder (east of Mirfield and south of Dewsbury). Across the District there are other smaller areas of flood zones 2 and 3, particularly around Fenay Beck (east of Almondbury), river Holme (south of Huddersfield), river Colne (south-west of Huddersfield) and the river Spen around Heckmondwike.
- 4.75 If any of those 22 sites are taken forward for development it is therefore essential that appropriate mitigation is incorporated; this may involve only developing the part of a site which is outside of flood zone 3 and instead using that land for open space. The sequential test would also need to have demonstrated that there are no suitable sites in lower areas of flood risk that could be allocated instead.
- 4.76 73 sites (8.5%) are on brownfield land outside of flood zones 3a and 3b and therefore are identified as having a negligible effect on this SA objective. The majority of sites (764 sites or 89% of all residential sites considered) have been identified as being located on greenfield land outside of flood zones 3a or 3b and are therefore likely to have a minor negative effect on this SA objective. However, mitigation measures such as SuDS should be designed into all new developments to reduce the impermeable surfaces created in the District and reduce the risk of surface water flooding, and not just reserved for those development sites in the high flood risk zones.

SA objective 17: Increase prevention, re-use, recovery and recycling of waste close to source

4.77 All new housing development is likely to involve an increase in waste generation regardless of the location of the potential residential sites, but may also offer good opportunities for incorporating sustainable waste management practices (e.g. through sustainable construction, but also designing new developments to incorporate space for storage and collection of recyclables). Kirklees has District-wide kerbside recycling; therefore proximity to household recycling centres is not a key indicator of the effects of development on recycling rates.

- 4.78 Where housing development is proposed on brownfield land there may be good opportunities for re-using existing buildings and materials, although this is uncertain depending on the previous use of the site and whether house builders incorporate sustainable waste management and construction techniques on-site. Of the 859 residential site options, 74 (9%) were identified as having potential minor positive effects on this SA objective as they are on brownfield land, while the remaining 785 (91%) sites would have a minor negative effect as they are on greenfield land.
- 4.79 The locations of the sites that could have a minor positive effect are shown in **Map R21** and it can be seen that they are mainly in the urban areas.

SA objective 18: Increase efficiency in water energy and raw material use

- 4.80 While all new residential development is likely to involve an increase in energy and water consumption this will not be influenced by the location of residential sites. In addition, new development may offer good opportunities for incorporating renewable energy generation and water efficiency measures and it is assumed that new houses will be built to high standards of efficiency.
- 4.81 Similarly, all housing developments will result in the increased consumption of minerals for construction but this will not be influenced by the location of residential sites. The location of development sites can influence the efficient use of minerals by the proximity of the development to Minerals Safeguarding Areas as development in those areas may sterilise mineral resources and restrict the availability of resources in the District. However, because of the extent of minerals resources within Kirklees, all site options would have the same effect. In addition, not all of the mineral resources would necessarily be economically viable and it may be possible to achieve prior extraction to avoid sterilisation. Therefore, all sites will have a negligible effect on this SA objective and no likely significant effects (either positive or negative) were identified for any of the residential site options.

SA objective 19: Reduce the contribution that the District makes to climate change

- 4.82 The location of residential development will not affect the contribution that the buildings make to climate change, which will be influenced by other factors such as how energy efficient the building is. However, where residential sites are well-connected by sustainable transport links to employment nodes, services and facilities, levels of car use and the associated greenhouse gas emissions are likely to be lower. Therefore, as for SA objective 10 above, the scores for this objective were based on the heatmapping work that has been carried out for Kirklees Council and takes into account how well connected each site is to the eight features assessed.
- 4.83 As described above under SA objective 10, 617 (72%) of the 859 site options were identified as likely to have a significant positive effect on this objective as they were considered to have a good level of access to at least four of the eight features assessed. A further 37 (4%) sites were identified as having likely significant negative effects as they have poor levels of access. The locations of the sites with likely significant positive effects are shown in **Map R22** and the sites with significant negative effects, which are therefore likely to result in the highest levels of greenhouse gas emissions from vehicle traffic, are shown in **Map R23**.
- 4.84 Unsurprisingly, opportunities to make use of sustainable modes of transport day to day and therefore to reduce the level of emissions from car use are likely to be highest where sites in the main urban areas are allocated, i.e. around Huddersfield, Cleckheaton and Dewsbury. The site options in the south and east of Kirklees are likely to offer less good opportunities and may result in higher levels of increased emissions from car use; however these type of effects will also be influenced by the extent to which sustainable transport infrastructure is incorporated into the new development. This may be more viable when larger sized sites are allocated.

Table 4.1: SA scores for all 859 residential site options

Table 4.1	: SA sc	ores to	or all 8	59 res	identia	al site	optior	1S	SA ob	jectiv	05								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H1	++	0	++?	+	-	+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H2		0	+?	-	-	0	0	++	+	+	-	-?	?	-?	0	-	-	0	+
	++/+	0	++?/	+/0	-	+/-	0	++/	++	++		?	?	?	0	_	_	0	++
НЗ		Ŭ	0?	1,0		11	ŭ	? ++/											
H4		0	?		-		0	?	++			?	?	0?	0	-	-	0	
H5	0/	0	++?/ +?	+/-	-	+/-	0	++	+	+	-	-?	?	0?	0	-	-	0	+
H6	++	0	++?	0		0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
	++/+	0	++?/	0		+/-	0	++/	++			?	0?	-?	0	_	_	0	++
H7			0?					?		++									
H8 H9	- 0	0	+?	+	-	+	0	++	++	+ +	-	-? ?	0? ?	-? -?	0	-	-	0	+
117					-			++/											++
H10	0	0	++?	+		0	0	?	+	++	-	-?	?	-?	0	-	-	0	++
H11	++	0	++?	+	-	+	0	++/ ?	+	++	-	-?	0?	?	0	-	-	0	++
H12	++/	0	++?/	+/		+/	0	++/ ?	+	++	-	-?	0?	-?	0	-	-	0	++
H13	-	0	++?	-		0	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H14	+	0	+?	+	-	0	0	++	+	+		-?	?	-?	0	-	-	0	+
H15	0	0	++?/ +?	+	-	+	0	++	+	+	-	-?	?	-?	0	-	-	0	+
H16	-	0	+?	+		0	0	++	+	++	-	-?	?	-?	0	-	-	0	++
		0	++?/				0					-?	0?	0?	0			0	
H17	++/		?	+/		+/		++/	+	++	-					-	-		++
H18	++	0	+?	0	-		0	?	+	+	-	-?	-?	0?	0	-	-	0	+
H19	-	0	+?	+		+	0	++/ ?	+	++	-	-?	?	?	0	-	-	0	++
H20	++	0	++?		-	+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H21 H22	0 +	0	++? 0?	+ 0	-	+	0	++	+	++	+	+? +?	?	-? ?	0	- 0	- +?	0	++
H24	+	0	+?	+	-	0	0	++	+	+		-?	0?	0?	0	-	-	0	+
H25		0	+?		-	-	0	++/	+	+	-	-?	0?	-?	0	-	-	0	+
H26		0	+?		-	-/	0	?	+	+	-	-?	?	0?	0	-	-	0	+
H27	++	0	++?	+		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H28	++/+	0	+?	++/+		0	0	++	+	+		-?	0?	-?	0	-	-	0	+
H29	++	0	++?	+	-	+	0	++/ ?	+	++	-	-?	0?	-?	0	-	-	0	++
H30	+	0	+?	+		+	0	++/ ?	+	++	-	-?	0?	?	0	-	-	0	++
H31	++	0	++?	+		+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H32 H34	++	0	++?	+		+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H35	0 +	0	++?	+	-	0	0	++	+	++	+	+? -?	0? 0?	? 0?	0	-	+?	0	++
H36	+	0	+?	+	-	0	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
H37	++	0	++?	+	-	-	0	++	+	++	-	-?	?	?	0	-	-	0	++
H38	-	0	+?	-	-	0	0	++/?	++	+		?	0?	-?	0	-	-	0	+
H39	++	0	++?/	+/-		+/-	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H40	++/+	0	+?	0	-	+	0	++	+	+	-	-?	?	?	0	-	-	0	+
H41		0	+?	?	-		0	++/?	+	+	-	-?	0?	?	0	-	-	0	+
H42	-	0	++?	0	-	-	0	++/ ?	+	+	-	-?	?	-?	0	-	-	0	+
H43	0	0	++?	+	-	+	0	++/	+	++	-	-?	?	-?	0	-	-	0	++
H44	0	0	++?	0	-	-	0	++	+	+	-	-?	0?	?	0	-	-	0	+
H45	++/+	0	+?/0?	+/0	-	+/-	0	++	+	+	-	-?	?	-?	0	-	-	0	+
H46	++	0	++?/-	++/0		++/0	0	++	++	+		?	0?	-?	0	-	-	0	+
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1: Employment 2: Economy 3: Education 4: Health 5: Amenity 6: Services and Facilities 7: Crime 8: Recreation 9: Housing 10: Sustainable Transport 11: Efficient land use 12: Landscape 13: Historic Environment 14: Biodiversity and geodiversity	15: Pollution 16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H47 0 +? 0 0 ++ + +? 0? 0? H48 + 0 ++? + - + 0 ++ + + + +? 0??	0 -	-	0	+
++/-		+?	0	++
H49 ++ 0 ++; +/0 - +/0 0 ? + ++; 0; 0;	0 -	-	0	++
H50 0 0 ++? + +/- 0 ++ + + + +? 0? 0? H51 0 -? 0 ++ +? 0? -?	0 0	+?	0	
H51 0 -? 0 ++ +? 0? -? H52 - 0 ++? + - + 0 ++ + + +? 0? 0?	0 -	-	0	++
0 0 ++/	0 -	_	0	++
H53	-		-	
H54 + 0 +? + 0 ? + ++ 0 ?	0	-	0	++
H55 ++ 0 0? + + 0 ++ + + + +? 0? -?	0 0	+?	0	+
H56 + 0 +? + - 0 0 ++ + +? 0? 0? H57 0 0 ++? + - + 0 ++ + +? ? 0?	0 -	-	0	++
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H58 / / / / / / / / / / / / / / / / / / /		-		+
H59 + 0 +? + 0 0 ++ ++ +? 0? 0?	0 -	-	0	+
H60 +/- 0 +/ 0 ? + + + +/ 0/ 0/	0 0	+?	0	+
H61 ++ 0 ++? + ++ 0 ++/ + ++? 0? 0?	0 -	-	0	++
H62 ++ 0 ++? ++/+ + 0 ++/ + ++ + +? 0? 0?	0 -	+?	0	++
H63 ++ 0 ++? ++ 0 ++/ + ++? 0? -?	0 -	-	0	++
H64 ++ 0 ++/+ 0 0 ++ ++ ++ 0? -?	0 -	-	0	++
H65 ++ 0 0? + - 0 0 ++/- +? 0? 0?	0 -	-	0	+
H66 + 0 +? + 0 ++ +? 0??	0 -	-	0	+
H67 0/- 0 ++?/ - + 0 ++/ ? + + ? ? -?	0 -	-	0	+
H68 0 +?/-? -// 0 ++ ++ +? ? -?	0 -	-	0	+
0 ++?/-	0 -	_	0	+
Hoy ?	0 -	_	0	
++/				++
H71 ++ 0 ++? + - ++/+ 0 ? + ++? 0? -?	0 -	-	0	++
H12	0 -	-	U	++
H73 ++ 0 ++? + - ++ 0 ++/ + ++? ? -?	0 -	-	0	++
H74 ++ 0 +? + 0 ++/ + +? 0? 0?	0 -	-	0	+
H75 + 0 +? + 0 0 ++ +? ? -?	0 -	-	0	+
H76 ++ 0 +? + 0 ++/ ? ++ +? 0??	0 -	-	0	+
H77 ++ 0 +? ++/0 0 ++ ++ +? 0? -?	0 -	-	0	+
H78 ++ 0 ++? + 0 ++ + ++? 0??	0 -	-	0	++
H79 ++ 0 +? + + 0 ++ + ++? 0??	0 -	-	0	++
H80 0 0 ++? + - + 0 ++/ + ++? ? -?	0 -	-	0	++
H81 -/ 0 ++?/ 0/ 0 ++ + ? ??	0 -	-	0	
H82	0 -	-	0	+
H84 + 0 +?/0? + 0 ++ + +? -? -?	0 -	-	0	+
H85 ++ 0 ++? ++ - 0 0 ++/ + ++ + +? 0? -?	0 0	+?	0	++
	0 -	-	0	++
		-	0	++
H88	0 -	-	0	++
H90 ++ 0 +? + - 0 0 ++ + + +? 0? -?	0 -	-	0	++

									SA ob		es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H91 H92	+	0	+?	+	-	-	0	++	+	+	-	-?	0?	0	0	-	-	0	+
H92 H93	++	0	++?	+	-	0 +	0	++	+	++	-	-? -?	0? 0?	-? 0?	0	-	-	0	++
H94	+	0	+?	+	-	0	0	++/ ?	+	++	-	-?	0?	?	0	-	-	0	++
H95		0	?		-		0	++/?	+		-	-?	?	0?	0	-	-	0	
H96	+	0	++?	+	-	0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H97	++	0	++?	++/+	-	0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H99	0	0	+?	+		+	0	++	+	++	-	-?	0?	?	0	-		0	++
H100	++	0	+? ++?/	+/-		+	0	++	+	++	+	+?	0?	-?		-	+?	0	++
H101 H102	0	0	++!/ +?	++/+		++/0	0	++/?	++	++		? -?	?	-? ?	0	-	-	0	++
H103	++	0	++?	++		+	0	++	+	++	+	+?	0?	-?	0	-	+?	0	++
H104	++	0	+?	0	-	+	0	++	++	++		?	0?	0?	0	-	-	0	++
H105 H106	++	0	++?	+		++	0	++/ ? ++	+	++	+	+?	-? ?	-? ?	0	-	+?	0	++
								++/				-?	0?	-?					
H107	++	0	++?	++		+	0	?	+	++	-				0	-	-	0	++
H108 H109	0	0	+?	+	-	-	0	++	+	++	-	-?	?	?	0	-	-	0	++
П109	++	0	+?	+	-	+	0	++/	+	++	-	-?	0?	?	0	-	-	0	++
H110	+	0	++?	- 0	-	- 0	0	? ++/	++	++	-	-? ?	?	-? ?	0	-	-	0	+ +
H111	+	0	+?	+		0	0	?	+	++	-	-?	0?	- ?	0	_	_	0	++
H112 H113	++	0	++?		-	_	0	?	+		_	-?	0?	-?	0	-	-	0	
H114	-	0	+?	+	-	0	0	++ ++/ ?	+	++	-	-? -?	0?	-: -?	0	-	-	0	++
	+	0	++?	+	_	++	0	++/	++	++		?	0?	0?	0	_	_	0	++
H115 H116								?											
HIIO	0	0	+?	+	-	-	0	++/	+	++	-	-?	?	-?	0	-	-	0	++
H117	++/0	0	+?/-?	++/+	-	+/-	0	?	++	++		?	?	-?	0	-	-	0	++
H118	++	0	++?	+/-		-	0	++	+	++	-	-?	0?	?		-	-	0	++
H119 H120	0	0	+?	+	-	+	0	++/	+	++	-	-?	?	-? -?	0	- 0	-	0	++
H120	++	0	++?	++	-	+	0	++	+	++	+	+? -?	- ? 0?	-? 0?	0	-	+?	0	++
			++?/																
H122	++/+	0	0?	+	-	+/-	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
H123 H124	++	0	++?	+	-	0	0	++	+	++	-	-? -?	0?	0?	0	-	-	0	++
H124	++	0	++?/+?	++	-	++	0	++ ++/ ?	++	++		-? ?	0? ?	0? -?	0	-	-	0	++
H126	++	0	++?	++	-	0	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H127	++	0	++?	+	-	+	0	++	+	++	-	-?	?	?	0	-	-	0	++
H128	+	0	+?	+	-	0	0	++/ ? ++/	+	+	-	-?	0?	0?	0	-	-	0	+
H129	+	0	+?	+		++/+	0	?	++	++		?	0?	?	0	-	-	0	++
H130	0	0	+?	+	-	-	0	++	+	+	-	-?	?	?	0	0	-	0	+
H131	0	0	++?	+		+/0	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H132	++	0	0? ++?/	++	-	+	0	++/?	+	++	+	+?	0?	?	0	0	+?	0	++
H133	/-	0	0?	+/0	-	-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H134	++	0	++?	+	-	+	0	++/?	+	++	-	-?	0?	0?	0	-	-	0	++
H135		0	+?	-	-	-	0	++/	+	+	-	-?	?	-?	0	-	-	0	+

									SA ob	jectiv	es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H136	-	0	++?	+		0	0	++/ ?	+	++	-	-?	?	-?	0	-	-	0	++
H137	++	0	++?	+	-	0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H138	++	0	+?	++		+	0	++	++	++		?	0?	0?	0	-	-	0	++
H139	-	0	+?	0	-	-	0	++	+	+	-	-?	0?	?	0	-	-	0	+
111.40	0	0	++?	+	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H140 H141	++	0	++?	+	_	-	0	?	+	++	_	-?	?	-?	0	_	_	0	++
H142	/-	0	0?	0	-		0	++	+		-	-: -?	?	-: -?	0	-		0	
	++	0	++?	+		+	0	++/	+	++	_	-?	0?	0?	0		_	0	++
H143								?											
H144 H145	+/	0	0?/? ++?	-/ +	-	-/ 0	0	++	+	+	+	-? +?	?	? 0?	0	- 0	- +?	0	+
11110								++/											
H146	-	0	++?	+		+	0	?	+	++	-	-?	0?	-?	0	-	-	0	++
111.47	++	0	++?/	+/0		++/0	0	++/	++	+		?	0?	0?	0		-	0	+
H147			0? ++?/					?											
H148	++	0	+?	++		+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H149	+	0	++?	0	-	+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H150	0	0	+?	+		++	0	++/	+	++	-	-?	0?	-?	0		-	0	++
птоо								++/											
H151	++/+	0	++?	+	-	++/+	0	?	++	++	++	+?	0?	0?	0	0	+?	0	++
H152	++	0	+?	+		+	0	++	+	++	-	-?	0?	-?	0		-	0	++
H153 H154	-	0	++?	+	-	+	0	+/?	+	++	-	-?	0?	?	0	-	-	0	++
H154 H155	++/+	0	? ++?/0	0/-	0	0/	0	++	+ +	++	+	+? ?	?	-? -?	0	0	+?	0	++
H156	0	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H157	++	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H158	0	0	++?	+		-	0	++/	+	++	-	-?	?	?	0	-	-	0	++
11130								++/					_						
H159	-	0	+?	+	-	+	0	?	+	++	-	?	?	?	0	-	-	0	++
H160	++	0	+?	0	-	0	0	++	++	++		?	0?	-?	0	-	-	0	++
H161	++	0	+?	++		+	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
		0					0	++/				2	00	00	0			0	
H162	++	0	++?	+	-	+	0	?	+	++	-	-?	0?	0?	0	-	-	0	++
H163	++	0	+?	+	-	/-	0	++	+	++	-	-? -?	0?	-? -?	0	-	-	0	++
H164 H165	++/+	0	++? 0?	+/0	-	++ 0/	0	++	+	++	-	-? -?	0? ?	-? 0?	0	-	-	0	++
H166	0	0	+?	+	-	0	0	++	+	++	-	-?	?	?	0	-	-	0	++
H167	+/0	0	+/-?	+/0	-	0/-	0	++	+		-	-?	0?	-?	0	-	-	0	
H168	++	0	++?/-· ?	+/		+/	0	++	+	++	-	-?	0?	?	0	-	-	0	++
11100			+?/																
H169	++/	0	?	+/		+/	0	++	++	++		?	0?	?	0	-	-	0	++
H170	++	0	++?	+	-	+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H171	++	0	++?	+		+	0	++/ ?	+	++	+	+?	0?	0?	0	0	+?	0	++
H172	+	0	++?	+		0	0	++	+	++	+	+?	?	0?	0	0	+?	0	++
H173	++	0	++?	+		0	0	++	+	++	-	-?	0?	0?	0	-		0	++
H174	0	0	+?	+		+	0	++	+	++	+	+?	0?	?	0	0	+?	0	++
H175 H176	+	0	+?	+	-	0	0	++	+	++	-	-? -?	?	? -?	0	-	-	0	++
H176 H177	++	0	++?	++		+	0	++/	+	++	-	-? -?	-! ?	-? -?	0	-	-	0	++
H178		0	?		-		0	++	+		-	-?	0?	?	0	-	-	0	
H179	++	0	++?	++		+	0	++	+	++	-	-?	?	?	0	-	-	0	++
H180	-	0	+?	-	-	0	0	++/ ?	+	+	-	-?	0?	0?	0	-	-	0	+
H181		0	+?	-	-	0	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H182	++	0	++?	+	-	+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H183	-	0	0?/+?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++

									SA ob	jectiv	es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H184	0	0	0?	+	-	+	0	++	+	+	-	-?	?	0?	0	-	-	0	+
H185	++	0	++?	+		+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H186	++/+	0	++?/ +?	+		+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H187	0	0	+?	+	-	+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H188	++	0	++?	+		+	0	++	++	++		?	?	-?	0		-	0	++
H189	++	0	++?	+		+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H191	++	0	+?	+		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H192	++/+	0	++?/+?	+		+/0	0	++	+	++	+	+?	0?	-?	0	0	+?	0	++
H193	++	0	++?/	+/0		+/-	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H194	++	0	++?	++/+	-	0	0	++/	++	++		?	0?	-?	0	-	-	0	++
H195	+	0	0?	0	-	0/	0	++	+	+	-	+?	0?	-?	0	0	+?	0	+
H196 H197	++	0	++?	++ 0		+ 0	0	++	+	++	+	+? -?	0? 0?	0? -?	0	0	+?	0	++
11177	++							++/	+	++									++
H198	++	0	+?	0	-	-	0	?	+	++	-	-?	?	0?	0	-	-	0	++
H199	++	0	++?	+	-	0	0	++	+	++	-	-?	?	?	0	-	-	0	++
H200 H201	-	0	+? +?	+	-	+	0	++	+	+	-	? -?	0?	-? -?	0	-	-	0	+
H202	++	0	+?	++	-	+ +	0	++	+	++	-	-? -?	0? ?	-? -?	0	-	-	0	++
H203	++	0	++?	+	-	-	0	++	+	++	+	+?	?	0?	0	0	+?	0	++
H205	++	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H206	+	0	++?	0		0	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H208	0	0	+?	+	-	+	0	++/	+	++	-	+?	?	-?	0	-	-	0	++
H210	++	0	+?	++	-	+	0	++/ ?	+	++	-	+?	0?	?	0	-	-	0	++
H211	++	0	++?	+		+	0	++	+	++	+	+?	-?	-?	0	-	+?	0	++
	_	0	++?	+	_	+	0	++/	++	++	++	+?	-?	-?	0	0	+?	0	++
H213				Т.				?	7.7	++						U	т:		
H214 H215	0 ++	0	++?	++/+		+	0	++	+	++	-	-? -?	0? ?	0? -?	0	-	-	0	++
H216	0	0	+?	++/+		++	0	++	+	++	+	+?	0?	-: -?	0	0	+?	0	++
	+/0	0	+?	+/0		0/-	0	++/			_	-?	?	0?	0	_	_	0	
H218								?	+	+									+
H220 H221	+	0	++?	+		+	0	++	+	++	+	+? -?	?	? ?	0	0	+?	0	++
11221			++?/					++/		++									++
H222	++	0	+?	+/0		++/0	0	?	++	++		?	0?	?	0	-	-	0	++
H223	0	0	++?	+		++/0	0	?	++	++		?	?	?	0	-	-	0	++
H224	++	0	++?	++		+	0	++	+	++	+	+?	0?	-?	0	0	+?	0	++
H225	++	0	+?	+	-	+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H226	+	0	++?	+	-	+/-	0	++/ ?	+	++	-	-?	0?	0?	0	-	-	0	++
H227	++	0	++?	+	-	+	0	++	+	++	+	+?	?	-?	0	0	+?	0	++
H228		0	+?	-	-	0	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
H229	0/	0	++?/?	+/	-	+/	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H231	++/+	0	++?	+		+/0	0	++/ ?	++	++		?	0?	?	0	-	-	0	++
H232	+	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H233	++/-	0	0?	+		0	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H234		0	+?	+	-	-	0	++	+	+	-	?	?	-?	0	-	-	0	+
H235	+/-	0	+?	+	-	0	0	++/ ?	+	+	-	-?	0?	-?	0	-	-	0	+
H236	++	0	+?	0	-	+	0	++/	+	++	-	-?	0?	?	0	-	-	0	++
H237	0	0	+?	+	-	+	0	++	+	+	-	-?	?	-? 02	0	-	-	0	+
H238		0	?		-		0	+	+		-	-?	?	0?	0	-	-	0	

									SA ob	jectiv	es								
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H239	++	0	+?	+/0		-/0	0	++	+	++	+	+?	-?	-?	0	0	+?	0	++
H240	++	0	?		-		0	++/	+	+	-	-?	0?	-?	0	-	-	0	+
H241	++/	0	++?/-· ?	+/		++/	0	++/?	++	++		?	0?	-?	0	-	-	0	++
H242	++	0	++?	0	-	0	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H243	++	0	?		-		0	++/?	+	+	-	-?	0?	-?	0	-	-	0	+
H244	0	0	++?	+	-	+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H245	++	0	+?	+		0	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H246	+	0	+?	+		-/	0	++/ ? ++/	++	+		?	-?	0?	0	-	-	0	+
H247	++	0	++?	+		+	0	?	++	++		?	?	-?	0	-	-	0	++
H248	0	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H249		0	+?/-?	-	-	-/	0	++	++	+		?	?	0?	0	-	-	0	+
H250	-	0	++?	+	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H251 H252	-	0	++?	0	-	+	0	++	+	+	-	-?	?	?	0	-	-	0	+
H252 H253	-	0	++?	+	-	+	0	++	+	++	+	+? -?	?	-? -?	0	0	+?	0	++
H254	-	0	++?	+ 0	-	+	0	++	+	++	-	-? -?	?	-? -?	0	-	-	0	++
H255		0	+?/ ?		-		0	++	+	+	-	-?	?	?	0	-	-	0	+
H256	++/	0	++?/?	+/	-	+/	0	++/?	++			?	?	?	0		-	0	
H257	++/	0	++?/?	+/		+/	0	++	++			?	?	?	0		-	0	
H258	0	0	++?	+	-	+	0	++	+	++	-	-?	?	?	0	-	-	0	++
H259	0/-	0	++?	+/0		+/0	0	++	++	++		?	0?	?	0	-	-	0	++
H260 H261	++	0	+?	+		+	0	++/	+	++	-	+? -?	0? 0?	0?	0	0	+?	0	+ +
H262	+	0	0?	+	-	-	0	?	+	+	-	-?	?	-?	0	-	-	0	+
H263	++	0	++?	+	-	+	0	++/	++	++		?	?	?	0	-	-	0	++
H264	++	0	++?	+		+	0	++/	+	++	-	-?	?	?	0	-	-	0	++
H265	0/++	0	++?/ +?	+		/+	0	++/?	++	+		?	?	?	0	-	-	0	+
H266	-	0	+?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H267 H268	0 +	0	+?	0 +	-	++/+	0	++	+	++	+	-? +?	?	-? -?	0	- 0	- +?	0	++
H269	++	0	+?	+		0	0	++/	+	++	+	+?	-?	-?	0	0	+?	0	++
H270	+	0	+?	+	-	-	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
H271	0/	0	+?/-? ++?/-	+/-	-	+/	0	++	+	+	-	-? ?	?	-? -?	0	-	-	0	+
H272	++/	0	? + +?/-?	+/	-	+/	0	++/	++	++		<i>?</i>	?	-? -?	0	-	-	0	+
H273	++/0	0	++!/-!	+/0		+/	0	?	++	++		<i>?</i>	0?	?	0	-	-	0	++
H274								?											
H275 H276	++/	0	+?/? +?			+/?	0	+	++	+		?	0? 0?	? -?	0	- 0	-	0	+
H276	++	0	++?	++/+		0	0	++ ++/ ?	+	++	+	+?	0?	-? -?	0	0	+?	0	++
H278	++	0	++?	+		++	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H279	++/0	0	++?/ 0?	+/-		0/	0	++	++			?	0?	0?	0	-	-	0	
H280	+	0	++?	+	-	+	0	++	+	++	-	-?	?	?	0	-	-	0	++
H281	+	0	++?	+		++	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H282	-	0	0?	0	-	-	0	++	+		-	-?	?	0?	0	-	-	0	
H283	-	0	-?	0	-	0	0	++/	+	+	-	-?	0?	-?	0	-	-	0	+

									SA ob	jectiv	es								
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H284	-	0	++?/ +?	+/-	-	+/-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H285	+	0	++?	+	-	0	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H286	0/	0	+?/0?	+/0	-	-/+	0	++/ ?	++	+		?	?	-?	0	-	-	0	+
H287	0/	0	+?/	+/	-	+/	0	++/	++	+		?	?	-?	0		-	0	+
H288		0	+?	-	-	-	0	++	++	+		?	-?	-?	0	-	-	0	+
H289 H290	++	0	+?/0?	0		0	0	++	+	+	-	-? -?	?	0? 0?	0	-	-	0	+
H290 H291	0 +	0	++?	+	-	+ 0	0	++	+	++	-	-? -?	0?	-?	0	-	-	0	++
H291 H292		0	++?	+	-		0	++	+	++	-	-? -?	?	-? 0?	0	-	-	0	++
H292 H294	0/	0	+?	++	-	+	0	++	+	++	-	-? -?	?	-?	0	-	-	0	++
H295	++	0	++?	+	-	+	0	++	+	++	-	-: -?	0?	-?	0	-	-	0	++
H296	-	0	0?	-	-	-	0	++	+		-	-: -?	?	?	0			0	
H297	-	0	+?	+	-	+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H298	0	0	+?	+	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H299	++	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-		0	++
H300	-	0	+?	+	-	+	0	++	+	+	-	?	0?	-?	0	-	-	0	+
H301	0	0	+?	+	-	++/+	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H302	0	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	_	0	++
H303	0	0	+?	+	-	+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H304	0	0	0?	+		-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H305	++	0	+?	0		0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H306	++	0	++?	++	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H307	++	0	?		-		0	++	+		-	-?	?	0?	0	-	-	0	
H308	+	0	++?/ +?	+		+	0	++/?	+	++	-	-?	0?	?	0	-	-	0	++
H309	0	0	+?	+	-	+	0	++	+	+	-	?	0?	-?	0	-	-	0	+
H310	++	0	++?	+	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H311	++	0	++?	+		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H312	++/-	0	+?/-?	++/0	-	+/-	0	++/?	++	++		?	?	?	0	-	-	0	++
H313	++	0	++?	+/0		+/-	0	++	+	++	-	-?	?	?	0	0	-	0	++
H314		0	+?		-	-	0	++	+	+	-	-?	?	-?	0	-	-	0	+
H315	++/+	0	++?	+/0		0/-	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H316	-	0	+?	+	-	+	0	++	+	++	-	?	0?	?	0	-	-	0	++
H317	++/+	0	++?	+/0		0/-	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H318 H319	0	0	0?	+		-	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
H319 H320	++	0	++?	+ 0	-	0	0	++	+	++	-	-? -?	0? 0?	0? -?	0	-	-	0	++
H320	++	0	++?	0	-	0	0	++	+	++	-	-? -?	0?	-? 0?	0	-	-	0	++
H322	++	0	++?	0		+/-	0	++	++	++		-: ?	-?	0?	0	-	-	0	++
H323	++	0	+?/0?			+/-	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H325	+	0	0?	0	-	+	0	++	+	+	-	-?	0?	-?	0		-	0	+
H326	0	0	+?	+	-	0	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H327	++	0	+?	++		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H328	++	0	++?	0	-	+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H329	++	0	++?/ +?	+	-	+/0	0	++/	++	++		?	?	?	0	-	-	0	++
H330	0/	0	+?/	+/	-	+/	0	++	++			?	?	-?	0	-	-	0	
H331	0	0	++?/	+		+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H332	0/	0	++?/-	+	-	+/	0	++/	++	+		?	0?	-?	0	-	-	0	+
H333	++	0	++?	0	-	+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
		0	++?/									?	?	?					
H334 H335	++	0	0? +?	+/0	-	+/-	0	++	++	++		<i>?</i>	?	0?	0	-	-	0	++
		U					J							٥.	U			Ü	

									SA ob	jectiv	es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H336	++/0	0	++?/-	++/0		++/	0	++/?	++	++		?	0?	-?	0	-	-	0	++
H337		0	+?	-	_	-	0	++	+	+	-	-?	?	?	0	-	-	0	+
H338	++	0	+?	++	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H339	+	0	0?	+	-	-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H340	++	0	+?/0?	0	-	-	0	++	+	+	-	-?	0?	?	0	-	-	0	+
H342	-	0	-?	0	-	-	0	++/?	+	+	-	?	0?	-?	0	-	-	0	+
H343	0	0	++?	+	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H344	+	0	++?	0	-	+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H345	++	0	++?	++	-	0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H347	0	0	+?	+	-	0	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
H348 H349	0/	0	+? 0?	+	-	-	0	++	+	+	-	-? -?	?	-? -?	0	-	-	0	+
H350	++	0	++?	+		+ 0	0	++	+	++	-	-? -?	0?	-? -?	0	-	-	0	+ +
H351	++/+	0	++?/?	+/		0/	0	++	++	+		?	?	-?	0	-	-	0	+
H352	++/+	0	++?/ 0?	+/0	-	+/-	0	++	++	++		?	?	?	0	-	-	0	++
	++	0	++?	+	-	0	0	++/	+	++	-	-?	0?	-?	0	_	-	0	++
H354	0	0	++?	+	_	+	0	? ++/	+	++	_	-?	?	-?	0	_	_	0	++
H355	_	0	++?	+	_	+	0	? ++/	+	++	_	-?	?	?	0	_	_	0	++
H356	++	0	+?	+		++/0	0	? ++/	+	++	_	-?	0?	-?	0	_	_	0	++
H357	++	0	+?	+	-	+/0	0	? ++/	+	++	_	· -?	0?	0?	0	_	_	0	++
H358	++	0	+?	+		0	0	? ++/	+	++		-: -?	0?	-?	0	_		0	++
H359	++							?		++									++
H360	++	0	+?	++/+	-	0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H361	++	0	+?	+	-	+	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H362	++/	0	+?/	0/	-	-/	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H363	++/+	0	+?/0?	+/0		+/-	0	++/ ?	++	++		?	0?	0?	0	-	-	0	++
H364	0	0	+?	+	-	- (0	0	++	+	+	-	-?	?	-?	0	-	-	0	+
H365	0/-	0	++?/	+/0	-	+/0	0	++	++	++	++	+?	?	-?	0	0	+?	0	++
H366	++/+	0	0?	+/0		+/-	0	?	++	++		?	?	0?	0	-	-	0	++
H367	- + +	0	+?	0	-	0 +	0	++	+	++	+	+? -?	0? ?	0? -?	0	- -	+?	0	++
H408	++	0	++?	+	_	+	0	? ++/	++	++		?	?	-?	0	_	_	0	++
H435								?											
H437	+	0	+?	+		+	0	++	+	++	-	-?	-?	?	0	-	-	0	++
H438	0	0	++?	0		0	0	?	+	+	-	-?	0?	0?	0	-	-	0	+
H439	0	0	+?	+	-	+	0	?	+	+	-	-?	0?	0?	0	-	-	0	+
H440	0	0	+?	+	-	+	0	?	++	++		?	0?	-?	0	-	-	0	++
H441	+	0	++?	+		+	0	++	+	++	+	+?	-?	?	0	0	+?	0	++
H442	++	0	++?	+		+	0	++/?	++	++		?	?	0?	0	-	-	0	++
H443	++/+	0	++?/	++/+		+/0	0	++/?	++	++		?	?	-?	0	-	-	0	++
H444	++	0	++?	+	-	+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H445	-	0	-?	+	-	-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H446	++	0	++?	+	-	-	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H447	++/+	0	++?/	++/0	-	+/-	0	++	++	++		?	?	-?	0	-	-	0	++

									SA ob		es								
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H448	+	0	++?/ +?	+	-	+/0	0	++/ ?	+	++	-	-?	0?	-?	0	-	-	0	++
H449	0	0	+?/-?	0	-	-	0	++/	+		-	-?	0?	-?	0	-	-	0	
H450	++/0	0	++?/ 0?	+/	-	+/0	0	++	++	++		?	?	-?	0	-	-	0	++
H451	-	0	+?	-	-	-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H452	-	0	+?	+	-	0	0	++	+	+	-	-?	0?	-?	0	0	-	0	+
H453	0	0	++?	+		+/0	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H454	++	0	++?	+		++	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H455	++	0	++?	+	-	+	0	++/ ?	++	++		?	0?	?	0	-	-	0	++
H456	++	0	+?/ ?	++		+/	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H457	++	0	+?	+		0	0	++	+	++	+	+?	?	-?	0	0	+?	0	++
H458	++/	0	+?/	+/		0/	0	++/?	++	++		?	?	-?	0	-	-	0	++
H459	++/	0	+?/ ?	+/		+/	0	++/?	++	+		?	?	-?	0	-	-	0	+
H460	++	0	++?	+	-	+	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H461	+	0	+?	+	-		0	++/	+	+	-	-?	0?	?	0	-	-	0	+
H462	0/-	0	++?/ 0?	+	-	0/-	0	++/	+	++	-	-?	?	-?	0	-	-	0	++
H463	++	0	++?	+	-	+	0	++/	+	++	-	-?	0?	?	0	-	-	0	++
H464	++	0	++?	+/0		+/0	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H465	+/	0	+?/-?	+/0	-	+/-	0	++/	++	+		?	0?	?	0	-	-	0	+
H466	++/0	0	++?/-	++/-		0/	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H467	-	0	+?	+	-	0	0	++	+	+	-	-?	0?	?	0	-	-	0	+
H468	+	0	+?	0	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H469	+	0	+?	0	-	+	0	++	+	++	-	-?	0?	-?	0	-		0	++
H470	0	0	+?	+		+/0	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H471 H472	++	0	++?	+	-	++	0	++	+	++	-	-? -?	?	-? 02	0	-	-	0	++
H473	0	0	++?	+	-	+ 0	0	++	+	++	+	-? +?	?	0? -?	0	- 0	- +?	0	++
H474	0	0	++?	+	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H475	0	0	++?	+	-	+/0	0	++	+	++		-?	0?	0?	0		-	0	++
H476	++	0	++?	+/0	-	+/0	0	++	++	++		?	0?	-?	0	-	-	0	++
H477	++	0	+?	+		0	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H478	+	0	+?	+	-	+	0	++	+	++	+	+?	0?	-?	0	0	+?	0	++
H479	-	0	+?	+	-	0	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H480	-	0	+?	+	-	0	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H481	0	0	++?	+		+	0	++	+	++	+	+?	0?	-?	0	0	+?	0	++
H482 H483	++	0	++?	+		+	0	?	+	++	-	-? -?	0? 0?	0? -?	0	-	-	0	++
11400	-		++?	+	-	+	0	++	+	++	-					-	-		++
H484	+	0	++?	+		+	0	?	++	++		?	0?	?	0	-	-	0	++
H485	++/0	0	+?/-?	++/-		+/	0	++/	++	+		?	?	?	0	-	-	0	+
H486	++	0	0?	0	-	0/-	0	++	+	++	+	+?	?	-?	0	0	+?	0	++
H487	++	0	++?/ +?	+		+	0	++/?	+	++	-	-?	0?	0?	0	-	-	0	++
H488 H489	++	0	++?	+	-	+	0	++	+ +	++	-	-? -?	0? 0?	-? -?	0	-	-	0	++
			++?/																
H490 H491	+	0	+?	0	-	-	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
П47 I	++	0	+?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++

									SA ob	jective	es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H492	++	0	+?	+		-	0	++	++	++		?	0?	-?	0	-	-	0	++
11402	++/+	0	+?	+/0	-	-	0	++/	++	+		?	0?	?	0	-	-	0	+
H493 H495	-	0	++?	+/0	-	0	0	?	+	+	-	-?	0?	-?	0	-	-	0	+
			++?/					++/											
H496	-	0	0?	+/0	-	+/-	0	?	+	+	-	-?	0?	-?	0	_	-	0	+
H497	++	0	++?	+		+	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H498	++	0	++?	+	-	+	0	++/	+	++	+	+?	0?	-?	0	0	+?	0	++
H499	++	0	++?/	+	-	+/0	0	++/	+	++	-	-?	?	-?	0		-	0	++
H500	++/	0	++?/?	+/	-	0/	0	++	++	+		?	0?	-?	0	-	-	0	+
H501	++	0	+?	+	-	+	0	++/ ?	+	++	-	-?	0?	-?	0	-	-	0	++
H502	++	0	++?	+	-	+	0	++	++	++		?	0?	-?	0	-	-	0	++
H503	++	0	++?	++/+	-	+/0	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H504	++	0	+?/0?	+	-	+/-	0	++/ ?	++	+		?	0?	-?	0	-	-	0	+
H505	++/	0	+?/ ?	0/		0/	0	++	++			?	0?	-?	0	-	-	0	
H506	-	0	++?	+		+	0	++/?	+	++	-	-?	?	0?	0	-	-	0	++
H507	-	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H508	++	0	++?	+/0		+/0	0	++/ ?	+	++	-	-?	?	-?	0	-	-	0	++
H509	++	0	++?/	+		+	0	 ?/++	+	++	-	-?	0?	-?	0		-	0	++
H510 H511	+/0	0	+?/0? ++?	+	- 0	+	0	++	+	++	-	-? -?	?	-? 0?	0	-	-	0	++
11311	0/-	0	++?/	+		+		++	+	++		- : -?	0?	-?					++
H512	0/-	0	+?	+	-	0 +	0	++/	+	++	-	- ; -?	?	- ?	0	-	-	0	++
H513 H514	-		++?					?		++				2					
H314	0	0	+?	+	-	+	0	++/	++	++		?	?	-?	0	-	-	0	++
H515	++	0	+?	+		++/0	0	?	+	++	-	-?	0?	?	0	-	-	0	++
H516	++	0	++?	+	-	+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H517	++/+	0	++?/	+/0	-	0/-	0	++	++	++		?	0?	?	0	-	-	0	++
H518	0	0	++?	+	-	+	0	++	+	++	+	+?	?	-?	0	0	+?	0	++
H519	+	0	++?/ +?	0		-	0	++/	++	+		?	0?	-?	0	-	-	0	+
H520	++/	0	++?/?	+/		+/	0	++/ ?	++	++		?	?	0?	0	-	-	0	++
H521	0	0	++?	+	-	+	0	++/ ?	+	++	-	-?	0?	?	0	-	-	0	++
H522	++	0	++?	+	-	-	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H523	++	0	++?	++/+	-	0	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H524	++	0	++?	++	-	0	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H525	++	0	++?	++/+	-	0/-	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H526 H527	0 ++	0	+?	++	-	0	0	++	+	+	-	-? -?	0? 0?	-? 0?	0	- 0	- +?	0	+
4528	-	0	0?/?		-	+ -/	0	++	+	++	+	-? -?	0?	?	0	-	+ ?	0	++
H529	0	0	++?	+	-	+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H530	0	0	++?	+	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H531	++	0	++?/ +?	+	-	-	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H532	0	0	++?	+		+/0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++

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H533	0/-	0	++?	+/0	-	+/0	0	++/ ?	++	++	++	+?	0?	-?	0	0	+?	0	++
H534		0	?		-		0	++	+		-	-?	0?	0?	0	-	-	0	
H535 H536	+	0	++?	+	-	+	0	++	+	++	-	-? -?	0? 0?	-? -?	0	-	-	0	++
11330	+			+		+		++	+	++	-					-	-		++
H537 H538	-	0	++?	+/0	-	0	0	?	+	++	-	-?	0?	-?	0	-	-	0	++
нэзв	0	0	++?	0	-	-	0	++/	+	+	-	-?	0?	?	0	-	-	0	+
H539	++	0	++?	++	-	+	0	?	++	++		?	0?	-?	0	-	-	0	++
H540 H541	0 +	0	++?	0 +		0 +	0	++	+	++	-	-? -?	0? 0?	0? -?	0		-	0	++
	++/	0	+?/	0		+	0	++/	++	+		?	?	?	0		_	0	+
H542		Ü	? ++?/				Ü	? ++/					·		ŭ			Ü	
H544	++/	0	?	++/	-	++/	0	?	+	+		?	0?	?	0	-	-	0	+
H545	0	0	+?	+	-	+	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
H546	++	0	++?	+		+	0	++/ ?	+	++	-	-?	0?	0?	0	-	-	0	++
H547	0	0	+?	+	-	0	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H548 H549	0	0	+?/0? +?	+		+/-	0	++	+	++	-	-? -?	0? 0?	-? 0?	0	-	-	0	++
	0	0	+?	+	_	+	0	++/	+	++	_	-?	?	-?	0	_	_	0	++
H550 H551	+	0	+?	+		+	0	?	+	++	-	-?	0?	-?	0	-	_	0	++
H552	++	0	++?	+		+/-	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H553	0	0	+?	+	-	+	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H554	-	0	++?	+	-	+	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H555	0	0	++?	+		+	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H556	++/+	0	+?	+		0	0	++	+	++	-	-?	?	?	0	-	-	0	++
H557	+	0	+?	+	-	-	0	++	+	+	-	-?	?	-?	0	-	-	0	+
H558 H559	++	0	++?	0	-	+ 0/-	0	++	++	++		-? ?	?	-? 0?	0	-	-	0	++
H560	0	0	+?	+	-	0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H561	++/+	0	+?	0		+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H562	++	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H563	++	0	++?	+		+	0	?	+	++	-	-?	0?	-?	0	-	-	0	++
H564	++/+	0	++?	+	-	+/0	0	++/	++	++		?	0?	0?	0	-	-	0	++
H565	+	0	+?	+		0	0	?	+	+	+	+?	0?	0?	0	0	+?	0	+
H566	-	0	+?	-		0	0	++/	+	+	-	-?	?	-?	0	-	-	0	+
H567	++	0	0?	0		0	0	++	+	+	-	-?	?	0?	0	-	-	0	+
H568 H569	++	0	++?	+ 0	-	+	0	++	+	++	-	-? -?	0? 0?	0? -?	0	-	-	0	++
H570	+	0	+?/0?	+/0	-	0/-	0	++	+	++	-	-: -?	0?	-: -?	0	-	-	0	++
H571	0/-	0	++?/ 0?	+		+	0	++/?	++	++		?	?	-?	0	-	-	0	++
H572	++	0	+?/0?	+	-	+	0	++/	++	+		?	0?	-?	0	-	-	0	+
H573	0	0	++?	0	-	+	0	++/	+	++	-	-?	?	?	0	-	-	0	++
H574	++	0	+?	+	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H575 H576	++	0	++?	+	-	+ 0	0	++	++	++		? -?	?	-? 0?	0	-	-	0	++
H577		0	+?		-	0	0	++	+	+	-	-? -?	0?	0?	0	-	-	0	+
H578	++	0	+?/0?	++	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
по/б								?											

									SA ob	jectiv	es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H579	0	0	+?	0	-	+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H580	0/	0	++?/?	+/	-	+/	0	++/	++	+		?	0?	-?	0	-	-	0	+
H581	++	0	++?/ 0?	+/0	-	+/-	0	++/	++	++		?	?	?	0	-	-	0	++
H582	++	0	+?	++	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H583	++	0	+?	+	-	-	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H584		0	?	+/			0	++	+		-	-?	?	-?	0	-	-	0	
H585	+/0	0	+?/-?	+/0		0	0	++	+		-	-?	?	-?	0	-	-	0	
H586	++/	0	++?/-· ?	+/		0/	0	++/ ?	++	+		?	0?	?	0	-	-	0	+
H587	++	0	+?	+	-	+	0	++	+	++	-	-?	0?	-?	0	_	-	0	++
H588	+/	0	++?	+/	-	+/	0	++/?	++			?	?	?	0	-	-	0	
H589	0	0	+?	+	-	+	0	++/?	+	++	-	-?	?	0?	0	-	-	0	++
H590	+	0	+?	++	-	0	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H591	++	0	++?	0/+	-	+/-	0	++/ ?	+	++	-	-?	?	-?	0	-	-	0	++
H592		0	0?/?	+/-	-	+/	0	++	+		-	?	0?	-?	0	-	-	0	
H593	+	0	+?	0	-	+	0	++/?	++	++		?	0?	-?	0	-	-	0	++
H594	++	0	+?	0	-	+/0	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H595	+/0	0	++?/ 0?	++/+	-	+/-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H596	++	0	+?	+/0		0/-	0	++/ ?	++	+		?	?	0?	0	-	-	0	+
H597	-	0	+?	-	-	0	0	++	++	+		?	0?	-?	0	-	-	0	+
H598	/0	0	-?/0?	+/0	-	+/-	0	++/	++	+		?	0?	-?	0	-	-	0	+
H600	0	0	+?	+	-	+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
	+	0	++?	+		0	0	++/	+	++	_	-?	0?	-?	0	_	_	0	++
H601								?		7.7									
H602 H603	++	0	+? +?	+		0	0	++	+	++	-	-? -?	0? ?	? ?	0		-	0	++
H604	++	0	+?	+	-	+	0	++	+	++	-	-? -?	?	<i>?</i>	0	-	-	0	++
H605		0	+?		-	-	0	++	+	+	-	-?	?	0?	0	-	-	0	+
H606	+	0	+?	+	-	0	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H607	0	0	+?	+		+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H608 H609	0	0	+?/0? +?	+/0		+/-	0	++	++	++		? -?	0? 0?	? -?	0	-	-	0	++
H610	++ 0	0	0?	0	-	+	0	++	+	++	-	-? -?	?	-? 0?	0	-	-	0	++
			++?/					++/											
H611	++/+	0	0?	++/+		+/-	0	?	+	++	+	+?	0?	0?	0	0	+?	0	++
H612	++	0	++?	++	-	0	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H613	++	0	++?	++	-	0	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H614	+	0	0?	0/	-	-	0	++/	+	+	-	-?	?	?	0	-	-	0	+
H615	++	0	+?	+		++	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
	++	0	+?	+		++	0	++/	+	++	_	-?	0?	?	0	_	_	0	++
H616								?											
H617 H618	0	0	+? +?	+	-	+	0	++	+	++	-	-? -?	?	-? -?	0	-	-	0	++
H619		0	+?	+	-	+	0	++	+	++	+	-? +?	?	-? -?	0	- 0	+?	0	++
								++/											
H620	-	0	++?	+	-	+	0	?	+	++	-	-?	0?	-?	0	-	-	0	++
H621	-	0	+?	0	-	+/-	0	++	+	+	-	?	0?	-?	0	-	-	0	+
H622 H623	++	0	++?	++	-	+	0	++	+	++	-	-? -?	?	-? -?	0	-	-	0	++
H624	++/0	0	+?/-?	_		+/-	0	++	+	++	-	-: -?	0?	-?	0	-	-	0	++

									SA ob	jectiv	es								
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H625	++/	0	++?/?	++/	0	0/	0	++/?	+		-	-?	0?	0?	0	0	-	0	
H626		0	+?	-	-	-	0	++	+	+	-	-?	0?	?	0	-	-	0	+
H627	++	0	+?	++	-	++	0	++	+	++	+	+?	0?	-?	0	0	+?	0	++
H628	+	0	+?	+	-	+	0	++/	+	++	-	-?	-?	?	0	-	-	0	++
H629	+	0	+?	+		0	0	++	++	++		?	?	?	0	-	-	0	++
H630	0	0	+?	+	-	0	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H632	++	0	++?	++	-	+	0	++	++	++	-	-?	?	-?	0	-	-		++
H633	+	0	+?	++/+		+	0	++/ ?	+	++	-	-?	0?	-?	0	-	-	0	++
H634	0	0	0?	+		-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
	0	0	++?	_	_	+	0	++/	+	++	_	-?	0?	-?	0	_	_	0	++
H635 H636	++/+	0	+?			+/0	0	?				-?	0?	-?	0		_	0	
11030	++/+			+	-			++/	+	+	-					-			+
H637		0	0?	+	-	+	0	?	+	+	-	-?	0?	-?	0	-	-	0	+
H638	+	0	+?	+	-	0	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H639	++	0	+?	+	-	0	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H640	++	0	++?	+		+	0	?	+	++	+	+?	0?	0?	0	0	+?	0	++
H641	++	0	+?	++		++	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H642	++	0	+?/0?	+/-		-	0	++	+	+	-	-?	0?	-?			-	0	+
H643	-	0	+?	+		+	0	++/ ?	+	++	+	?	0?	-?	0	0	+?	0	++
H644	++	0	++?	+		+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H645	0	0	++?	0		0	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
H646 H647	++	0	++?	++		+	0	++	+	++	-	-? -?	0? 0?	0 ?	0	-	-	0	++
H648	++	0	+?	+		++	0	++	+	++	-	-: -?	0?	0?	0	-		0	++
H649	++/0	0	++?	+/0		+/0	0	++	++	++		?	0?	0?	0	-	-	0	++
H650	+	0	+?	+	-	0	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H651	++	0	+?	0	-	0	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H652	++/+	0	+?/0?	+		+/-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H653	++/0	0	++?	+/0	-	+	0	++	++	++	++	+?	0?	0?	0	0	+?	0	++
H654	0	0	++?	0	-	0	0	++/	+	+	-	-?	0?	0?	0	-	-	0	+
H655	0	0	++?	+		++	0	?	+	++	-	-?	0?	-?	0	-	-	0	++
H656	++	0	+?	+	-	0	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H657	++	0	++?/ 0?	++/+	-	+/0	0	++	++	++		?	0?	-?	0	-	-	0	++
H658	0	0	++?	+	-	+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H659	++	0	++?	+	-	+	0	++	++	++		?	?	?	0	-	-	0	++
H660	+	0	+?	+	-	0	0	++	+	++	-	-?	?	?	0	-	-	0	++
H661	++	0	+?	+	-	+/-	0	++/ ?	+	++	-	-?	0?	0?	0	-	-	0	++
H662	++	0	++?	++	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
	++	0	++?	+		+	0	++/	+	++	+	+?	-?	0?	0	0	+?	0	++
H663		Ü					Ü	?					·	0.	Ü	Ü		Ŭ	
H664	+/	0	++?/?	+/	-	+/	0	++	+	+	-	-?	?	?	0	-	-	0	+
H665	+	0	+?	+	-	0	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H666	++	0	++?/	++/+		+/0	0	++	++	++		?	0?	0?	0	-	-	0	++
H667	0	0	++?	+		+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H668	++	0	+?	++	-	++	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H670	-/	0	+?/-?	+/0	-	+/-	0	++	+	+	-	-?	0?	?	0	-	-	0	+
H671	0	0	+	+	-	+	0	++/	+	+	-	-?	?	-?	0	-	-	0	+

									SA ob	jectiv	es								
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H672	++/	0	++?/	+/		+/	0	++/	+			?	?	?	0	-	-	0	
H673	++	0	?	+	-	+	0	?	+	++	-	-?	0?	-?	0	-	_	0	++
	+/++	0	0?/+	++/0	_	0/-	0	++/	++	++		?	0?	0?	0	_	_		++
H674			+? ++?/					? ++/			\vdash	_							
H675	++/+	0	0?	+/0		+/-	0	?	++	+		?	?	-?	0	-	-	0	+
H676	+	0	++?/ +?	+		++/+	0	++/	++	++		?	0?	?	0	-	-	0	++
H677	+/0	0	+?/0?	0	-	-	0	++	+	+	-	-?	?	-?	0	-	-	0	+
H678	-	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H679	+	0	+?	+		0	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H680	++/+	0	++?	+		+	0	++/	++	++		?	0?	-?	0	-	-	0	++
H681	++	0	++?	+	-	+	0	++/ ?	+	++	-	-?	0?	0?	0	-	-	0	++
H683	+	0	++?	+		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H684	++	0	+?	+		0	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
11004		0	+?			0	0	++/			_	-?	0?	0?	0	_		0	
H685	++			+	-			?	+	++							-		++
H686 H687	++	0	++?	+		++	0	++	++	++	-	-? ?	0? 0?	-? -?	0	-	-	0	++
11007								++/						?					
H688	++	0	++?	+	-	+	0	?	++	++		?	?		0	-	-	0	++
H689	++	0	++?/	+	-	+	0	++/	+	++	-	-?	?	0?	0	-	-	0	++
H690	++	0	+?	+	-	+	0	?	+	++	-	-?	?	0?	0	-	-	0	++
H691	++/0	0	++?/ 0?	+/0		+/-	0	++/	+	++	-	-?	-?	-?	0	-	-	0	++
H692	++	0	+?	+/0	-	0	0	++	+	++	-	-?	?	?	0	-	-	0	++
	++	0	++?	++	_	+	0	++/	+	++		-?	0?	0?	0	_	_	0	++
H693 H694	++	0	++?	+	-	+	0	?	+	++	-	-?	0?	0?	0	-	-	0	++
1.07.	0	0	+?				0	++/			_	-?	?	-?	0			0	
H695				+	-	+		?	+	+						-	-		+
H696	0	0	+?	+	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H697	++	0	++?	+	-	++	0	?	+	++	-	-?	?	-?	0	-	-	0	++
H698 H699	++	0	++?	++		+	0	_ ^	+	++	-	-?	?	-?	0	-	-	0	++
H099	0/-	0	++?/	+		+	0	++/	++	++		?	?	-?	0	-	-	0	++
H700	+/	0	?	+/	-	++/	0	?	++	++		?	0?	?	0	-	-	0	++
H701 H702	+	0	++?	+		++	0	++	+	++	-	-? -?	?	-? 0?	0	-	-	0	++
H702	0		+?	+	-	++		++	+	++	-					-	-		++
H704	+	0	+?	++/+		+	0	?	+	++	-	-?	?	-?	0	-	-	0	++
H705	++	0	++?	++		++/+	0	++/ ?	+	++	-	-?	?	-?	0	-	-	0	++
11707	++	0	++?/	++		+	0	++/	++	++		?	?	-?	0	-	-	0	++
H706 H707	++	0	+? +?	++	-	++	0	?	+	++	-	-?	?	-?	0	-	-	0	++
	+	0	++?	+		+	0	++/	+	++	-	-?	?	0?	0	_	_	0	++
H708 H709								?											
11709	++	0	++?	++		+	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H710	+	0	+?	+	-	0	0	?	+	+	-	-?	0?	0?	0	-	-	0	+
H711	-/	0	++?/ 0?	+	-	+/0	0	++/ ?	+	++	-	-?	0?	-?	0	-	-	0	++
H712	0	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H713	0	0	+?	+		+	0	++/ ?	+	++	-	-?	?	?	0	-	-	0	++
H714	0	0	++?	+	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H715	0	0	+?	+	-	-	0	++	+	+	-	-?	?	-?	0	-	-	0	+

									SA ob	jectiv	es								
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H716	0	0	++?	+	-	++/+	0	++/ ?	+	++	-	-?	0?	?	0	-	-	0	++
H717	-	0	++?	+	-	+	0	++/ ?	+	++	-	-?	?	?	0	-	-	0	++
H718	-	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H719 H720	-	0	+?	+	-	+	0	++	+	++	-	?	0?	?	0	-	-	0	++
H720	-/	0	+?	0	-	-	0	++/	+	+	-	?	0?	-?	0	-	-	0	+
H721	+	0	+?	+		+	0	?	++	++		?	0?	?	0	-	-	0	++
H722	0	0	++?	+		+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H723	-	0	++?/ +?	+/0		+/-	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H724		0	+?	-	-	-	0	++	+	+	-	-?	?	?	0	-	-	0	+
H725		0	+?	-		-	0	++	+	+	-	-?	0?	?	0	-	-	0	+
H726	0	0	+?	+	-	+	0	++/	+	++	-	-?	?	-?	0	-	-	0	++
H727	0	0	++?	+		+	0	++/ ?	+	++	-	-?	0?	-?	0	-	-	0	++
H728	0/-	0	++?/ +?	+	-	0	0	++	++	++		?	0?	-?	0	-	-	0	++
H729	0	0	++?	+/0	-	0	0	++/ ?	+	++	-	-?	0?	-?	0	-	-	0	++
H730	0	0	++?	0	-	+	0	++/ ?	+	++	-	-?	?	0?	0	-	-	0	++
H731	0	0	++?	0		0	0	++	+	+	-	-?	0?	0?	0	-	-	0	+
H732	0/-	0	++?/ +?	+/0		+/-	0	++/ ?	++	++		?	?	0?	0	-	-	0	++
H733		0	++?	-	-	0	0	++/	+	+	-	-?	?	-?	0	-	-	0	+
H734	++	0	++?/	++/0		+/0	0	++/?	++	++		?	0?	-?	0	-	-	0	++
H735	++	0	++?	+		0	0	++/ ?	+	++	-	-?	0?	-?	0	-	-	0	++
H736	0	0	++?	+	-	++	0	++	++	++		?	?	-?	0	-	-	0	++
H737 H738	0	0	+?	+	-	0	0	++	+	+	-	-? -?	0? ?	-? -?	0	-	-	0	+
H739	++	0	+? +?	+	-	+	0	++	+	++	-	- ? -?	0?	-? -?	0	-	-	0	++
H740	++	0	++?	+/0		+/-	0	++	+	++	-	-?	?	?	0	-	-	0	++
H741 H742	++	0	++?	+	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H742	-	0	++?	0	-	+ 0	0	++	+	++	-	-? -?	?	-? -?	0	-	-	0	++
H744	++	0	++?	++	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H745 H746	++	0	++?	+	-	+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H747	++	0	++?	+/0		+	0	++ ++/ ?	+	++	-	-? -?	0? 0?	0? -?	0	-	-	0	++
H748	++	0	++?/	++/+	-	++/-	0	++/	++	++		?	0?	0?	0	-	-	0	++
H749	++	0	+?	+		0	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H750	++	0	+?/0?	+		+	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H751 H752	++	0	++?/	++/+	-	++/0	0	++/	++	++		?	0?	-?	0	-	-	0	++
H752 H753	++	0 0	? +?	0		0	0	++	+	++	-	-? -?	0? 0?	? -?	0	-	-	0	++
H754	+	0	++?	++		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H755	+	0	+?	+		0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H756 H757	++	0	++? ++?/ +?	+/0		0/	0	++/	++	++		-? ?	0? 0?	? -?	0	-	-	0	++
H757	++/	0	+? +?/ ?	++/		+/	0	? ++/ ?	++	+		?	0?	-?	0	-	-	0	+
H759	++	0	++?	++		0	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H760	++	0	++?	++		+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H761	++	0	++?	+	-	+	0	++	+	++	-	-?	?	?	0	-	-	0	++

									SA ob		es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H762	++	0	++?	+		0/+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H763	-	0	++?	+		+	0	++/	+	++	-	-?	?	0?	0	-	-	0	++
H764	+	0	++?	+	-	+	0	++/ ?	+	++	-	-?	?	-?	0	-	-	0	++
H765	+	0	+?	+		+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H768	++	0	++?	+		+	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H769	++	0	+?	+		++	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H770	++	0	++?	++	-	+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H772	++	0	++?/ 0?	+	-	+	0	++/ ? ++/	++	++		?	0?	-?	0	-	-	0	++
H773	+/++	0	+?/-?	+/0	-	0/-	0	?	+	++	-	-?	0?	-?	0	-	-	0	++
H774 H775	0/+	0	0?/+?	0 ++	-	+/-	0	++/ ? ++	+	+ +	-	-? -?	0? 0?	-? -?	0		-	0	+
H776	++	0	++?	++	-	+	0	++	+	++	-	-: -?	0?	0?	0	-	-	0	++
H777	++	0	++?	++		+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H778	++	0	++?	+		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H779	0	0	+?	+	-	++	0	++/?	+	++	-	-?	?	0?	0	-	-	0	++
H780	0	0	++?	+	-	0	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H781	+	0	+?	++/+		++	0	++/?	+	++	-	-?	0?	0?	0	-	-	0	++
H782	++	0	++?/ +?	++	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H783	++	0	++?	++	-	0	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H784 H785	0	0	+? +?	+	-	+	0	++	+	+	-	? ?	0? 0?	-? 0?	0	-	-	0	+
H786	+	0	++?	+		+	0	++	+	++	-	-?	?	-?	0	-	-	0	+ +
H787	0	0	++?	+		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H788 H789	-	0	++?	-	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
	++	0	+?	++	-	+	0	++	+	++	-	-? -?	0? 0?	0? 0?	0	-	-	0	++
H790 H791	++	0	++?	+	-	+	0	?	+	++	-	-?	0?	0?	0	-	-	0	++
H792	+	0	+?	+	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H793	++	0	++?	+	-	-	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H794	+	0	++?	+		+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H795 H796	++	0	++?	+	-	++	0	++	+	++	-	-? -?	?	-? -?	0	-	-	0	++
H797	++	0	++?	+	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H798	+	0	++?	+		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H799	+	0	++?	+		++	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H800	+	0	++?	+		++	0	?	+	++	-	-?	?	-?	0	-	-	0	++
H801 H808	++	0	+?	++	-	+	0	++	+	++	-	-? -?	?	0? -?	0	-	-	0	++
H809	++/+	0	++?/	++/0	-	+/-	0	++/	+	++	-	-? -?	0?	-? -?	0	-	-	0	++
H809 H810	++	0	0?	0	-	0	0	++	+	+	+	+?	?	0?	0	0	+?	0	+
H811	++	0	++?	+		+	0	++	++	++	++	+?	?	0?	0	0	+?	0	++
H812	+	0	++?	+		+	0	++	+	++	-	-?	0?	-?	0		-	0	++
H813 H814	++	0	+? +?	+	-	+	0	++	+	++	-	-? -?	0? 0?	0? -?	0	-	-	0	++
H815	++	0	++?	++	-	+	0	++	+	++	-	- ? -?	0?	-? 0?	0	-	-	0	++
H816	-	0	++?	+	-	+	0	++/?	+	++	-	-?	0?	?	0	-	-	0	++
H817	0	0	+?	+	-	+	0	++/?	+	+	-	-?	0?	-?	0	-	-	0	+
-																			

									SA ob	jectiv	es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H820	0	0	++?	+	-	+	0	++	+	++	-	-?	?	0?	0	-	-	0	++
H821 H822	-	0	0? ?	+	-	+	0	++	+	+	-	-? -?	0? 0?	-? ?	0	-	-	0	+
H1645	++	0	++?	+	-	0	0	++ ++/ ?	+	++	-	-? -?	?	-?	0	-	-	0	++
H1646	++	0	++?/ +?	++/+		+/0	0	++/	++	++		?	0?	-?	0	-	-	0	++
H1647	0	0	+?	+		+	0	++	+	+	+	+?	0?	-?	0	0	+?	0	+
H1648	++	0	++?	++		++	0	++/ ? ++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1649	++	0	++?	++	-	+	0	?	+	++	-	-?	0?	-?	0	-	-	0	++
H1650	++	0	++?	++		+	0	++/ ? ++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1651	++/+	0	0?	++/0	-	+/-	0	?	++	+		?	0?	-?	0	-	-	0	+
H1652	++	0	++?	++	-	0	0	++/ ? ++/	+	++	-	-?	0?	?	0	-	-	0	++
H1653	++	0	++?	+	-	0	0	?	+	++	-	-?	?	?	0	-	-	0	++
H1655	++	0	++?	+	-	0	0	++/ ? ++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1656		0	++?	+/-		0	0	?	+	++	+	+?	0?	-?		0	+?	0	++
H1657	++	0	++?	+	-	0	0	++/ ? ++/	++	++	++	+?	?	-?	0	0	+?	0	++
H1659	++	0	++?	++		0	0	?	+	++	-	-?	0?	0?	0	-	-	0	++
H1660	++	0	++?	++		+	0	++/ ? ++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1661	++	0	+?	+/-	-	+	0	?	+	++	-	-?	0?	?			-	0	++
H1662	+	0	+?	0		+	0	++/ ? ++/	+	++	-	-? -?	0? 0?	-? -?	0		-	0	++
H1663 H1664		0	+?	0			0	?				+?	0?	-; -?	0	0	+?	0	
H1665	++	0	+ + ? / + ?	+/0	-	+/0	0	++ ++/ ?	+	++	-	-?	0?	-? -?	0	-	-	0	++
H1666	++	0	+?	+	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1667	++	0	++?	+/-		0	0	++/?	+	++	-	-?	?	-?		-	-	0	++
H1668	+	0	++?	+	-	+	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H1669	++	0	++?	+		+	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H1670	+	0	++?/	+	-	++/+	0	++/ ? ++/	+	++	-	-?	0?	0?	0	-	-	0	++
H1672	+	0	++?	+	-	+	0	?	+	++	-	-?	?	0?	0	-	-	0	++
H1673	+	0	++?	+	-	+	0	++/ ? ++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1674	+	0	+?	+	-	+	0	?	+	++	-	-?	0?	?	0	-	-	0	++
H1675	+	0	+?	+	-	+	0	++/ ? ++/	+	++	-	-?	?	-?	0	-	-	0	++
H1676	++	0	++?	+	-	0	0	?	+	++	-	-?	0?	-?	0	-	-	0	++
H1678	++	0	+?	+	-	+	0	++/ ? ++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1679	++/+	0	0?	+	-	+/0	0	?	++	++		?	?	-?	0	-	-	0	++
H1680	+	0	++?/	+	-	+	0	++/	+	++	-	-?	?	-?	0	-	-	0	++

									SA ob		es								
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H1681	0	0	+?	+	-	+	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H1682	0	0	+?	+	-	+	0	++/?	+	+	-	-?	0?	-?	0	-	-	0	+
H1683	0/-	0	++?	+		0	0	++/ ?	+	++	-	-?	0?	0?	0	-	-	0	++
H1684	0	0	+?	+		+	0	++/?	+	++	-	-?	0?	0?	0	-	-	0	++
H1685 H1686	+	0	+?	+		+	0	++/	+	++	-	-? -?	0? ?	0? -?	0	-	-	0	++
H1687	++/0	0	+?	++/+		++/0	0	++	+	++	-	-? -?	?	-? -?	0	-	-	0	++
H1689	++	0	0? +?	++		+	0	++/	++	++		?	?	-?	0	-	-	0	++
H1690	++	0	+?	++		++	0	++/ ?	+	++	-	-?	0?	0?	0	-	-	0	++
H1692	++	0	+?	++	-	+	0	: ++/ ?	+	++	-	-?	0?	0?	0	-	-	0	++
H1693	++	0	+?	++		++	0	++/	+	++	-	-?	?	0?	0	-	-	0	++
H1694	++	0	+?	++		+	0	++/	+	++	+	+?	-?	0?	0	0	+?	0	++
H1695	++	0	+?	++		+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1696	++	0	++?	++		+	0	++	+	++	+	+?	0?	0?	0	0	+?	0	++
H1697	++	0	++?	++		+	0	?	+	++	-	-?	0?	0?	0	-	-	0	++
H1699	++	0	++?	++	-	+	0	? ++/	+	++	-	-?	0?	0?	0	-	-	0	++
H1700	++	0	++?	++	-	++	0	?	+	++	-	-?	0?	0?	0	-	-	0	++
H1701 H1702	++	0	++?	++	-	+	0	?	+	++	- +	-? +?	?	0? 0?	0	- 0	- +?	0	++
H1703	++	0	++?	+	-	+	0	++/?	+	++	-	-?	0?	?	0	-	-	0	++
H1704	++	0	++?	+		+	0	++/	+	++	+	+?	0?	0?	0	0	+?	0	++
H1705	++	0	++?/ 0?	+	-	+/-	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H1708	+	0	++?	+	-	+	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H1709	-	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H1710		0	++?	+	-	++	0	? ++/	+	++	-	-?	?	-?	0	-	-	0	++
H1711	0	0	+?	+		+	0	? ++/	+	+	-	-?	0?	-?	0	-	-	0	+
H1713	+	0	+?	+	-	+	0	? ++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1714	0	0	++?	0	-	+	0	? ++/	+	++	-	-?	?	-?	0	-	-	0	++
H1715	++	0	+?	+		+	0	? ++/	+	++	-	-?	0?	0?	0	-	-	0	++
H1716	++	0	++?	++	-	+	0	?	+	++	-	-?	?	-?	0	-	-	0	++
H1718	+	0	+?	+		++/0	0	? ++/	++	++		?	?	?	0	-	-	0	++
H1719	++	0	+?	++	-	+	0	?	+	++	-	-?	0?	?	0	-	-	0	++
H1720	++	0	+?	++		++	0	?	+	++	-	-?	0?	-?	0	-	-	0	++
H1722	++	0	++?	++		0	0	?	+	++	-	-?	0?	0?	0	0	-	0	++

									SA ob	jectiv	es								
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H1723	++	0	++?	+	-	+	0	++/ ?	+	++	-	-?	0?	0?	0		-	0	++
H1724	++/+	0	+?	+		-/	0	++/?	+	+	-	-?	0?	0?	0	-	-	0	+
H1726	++	0	+?	+/0	-	+/-	0	++/?	+	+	-	-?	?	0?	0	-	-	0	+
H1727	++	0	++?	+		0	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H1728	++	0	++?	+		++	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H1729	+	0	++?	+	-	0	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H1730	++/+	0	++?/ +?	++/+		++/0	0	++/?	++	++		?	?	-?	0	-	-	0	++
H1731	++	0	++?	++		+	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H1732	++	0	++?	++	-	+	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H1733	++/+	0	+?	++/+	-	+	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H1734	++/0	0	++?	++		++	0	++/?	+	++	-	-?	?	?	0	-	-	0	++
H1738	++	0	++?	+	-	+	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H1739	++	0	++?	+	-	+	0	++/?	+	++	-	-?	0?	?	0	-	-	0	++
H1740	++/+	0	++?/ 0?	+/0	-	+/-	0	++/?	+	++	-	-?	0?	?	0	-	-	0	++
H1741	+	0	+?	0		0	0	++/?	+	+	-	-?	0?	-?	0	-	-	0	+
H1742	+ 0	0	++?	+		+	0	++	+	++	-	-? -?	?	-? 0?	0	-	-	0	++
H1744		0	+?/-?	0	-	+		? ++/	+	++	-	- : ?	?	-?	0	-	-		++
H1746	++/0	0	++?/-	++/0	-	-/	0	? ++/	++	++		<i>?</i>	-?	-? -?	0	-	-	0	++
H1747 H1749	0/-	0	? +?/0?	+/		-/	0	?	++	+	-	-?	?	- ; -?	0	-	-	0	+
H1752	++/+	0	++?/ +?	+/0	-	+/	0	++/?	+	++	-	-?	0?	0?	0	-	-	0	++
H1753	++/0	0	++?/ +?	+/0	-	0/	0	++/?	+	++	-	-?	0?	0?	0	-	-	0	++
H1754	+	0	++?	+	-	0	0	++/?	+	++	-	-?	0?	0?	0	-	-	0	++
H1760	++	0	++?/ 0?	+/0	0	+/0	0	++/?	+	+	-	-?	?	0?	0	-	-	0	+
H1763 H1765	++	0	++?	++		+	0	++	+	++	+	+? -?	0? 0?	0? ?	0	0 -	+?	0	++
H1766		0	?		-		0	++/?	+		-	-?	0?	?	0	-	-	0	
H1767		0	+?	-	-	-	0	++/?	+	+	-	-?	?	-?	0	-	-	0	+
H1769 H1770		0	+? +?	- +		+	0	++	+	+	-	-? -?	0? 0?	-? ?	0	-	-	0	+
H1771 H1772	- + +	0	+? ++?	+ +	-	+/0	0	++	+	++	-+	-? +?	0? 0?	-? 0?	0	- 0	- +?	0	+ +
H1773	++/+	0	+?	+	-	+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1774	-	0	++?	0	-	+	0	+++	+	++	-	-?	?	-?	0	-	-	0	++
H1775 H1776	++	0	++?	+		+	0	?	+	++	-	-? ?	?	0? -?	0	-	-	0	++
H1777	++/	0	+?/?	+/		+	0	++/?	++			<i>?</i>	-?	-? ?	0		-	0	
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									SA ob	jectiv	es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H1783		0	?	++/	-	++/	0	++/ ?	++	++		?	0?	?	0	-	-	0	++
H1784	++	0	++?	+		+	0	++/ ?	+	++	+	+?	0?	-?	0	0	+?	0	++
H1785	+/-	0	++?	+		+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H1792	++/+	0	++?/ 0?	+		+/-	0	++/ ?	++	+		?	?	-?	0	-	-	0	+
H1793	-	0	+?	+	-	+	0	++	+	+	-	?	0?	-?	0	-	-	0	+
H1794	++	0	++?/	+		++/+	0	++/	+	++	-	-?	0?	-?	0	-	-	0	++
H1795	++/	0	++?/-· ?	++/		+/	0	++/ ?	++			-?	0?	0?	0	-	-	0	
H1796	++/+	0	++?	+	-	+/0	0	++	++	++		-?	0?	0?	0	-	-	0	++
H1797	++/	0	++?	+	-	+	0	++/?	+	++	-	-?	0?	0?	0	-	-	0	++
H1798	++/+	0	++?/ +?	+/	-	+/	0	++/?	+	++	-	-?	?	0?	0	-	-	0	++
H1802	-	0	0?	+/0	-	+	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H1810	++	0	++?	+	-	+	0	++/	+	++	-	-?	0?	0?	0	-	-	0	++
H1811	++	0	++?	++		+	0	++/ ?	+	++	-	-?	-?	-?	0	-	-	0	++
H1812	+	0	++?	+		+	0	++	+	++	-	-?	?	?	0	-	-	0	++
H1813	++	0	++?	+	-	0/-	0	++/	+ +	++	-	-? ?	0? 0?	0? -?	0	-	-	0	++
H1814 H1817	++	0	+? ++?	+	-	+	0	?	+	++		-?	?	-?	0	_	_	0	++
111017			++?/																
H1818	++	0	0?	0	-	+/-	0	++	+	++	+	+?	?	?	0	0	+?	0	++
H1819 H1935	+	0	0?	+		-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H1936	0/-	0	++?	++		+	0	++ ++/ ?	+	++	-	+? -?	-? ?	-? ?	0	-	+?	0	++
H1937	++	0	+?	++	-	+	0	++	+	++	+	+?	0?	?	0	0	+?	0	++
H1938	++	0	++?	++	-	+	0	++	+	++	+	+?	0?	0?	0	0	+?	0	++
H1978	+/0	0	+?/0?	+	-	+	0	++	+	++	-	-?	0?	?	0	-	-	0	++
H1983 H2066	++	0	++?	+	-	+	0	++	+	++	+	+? -?	0? 0?	0? 0?	0	0	+?	0	++
H2089	++/	0	++? ++?/ ?	+ +/		++/	0	++ ++/ ?	++	++		- ? ?	0?	?	0	-	-	0	++
H2091	++	0	++?	++	-	+	0	: ++/ ?	+	++	-	-?	0?	0?	0	-	-	0	++
H2092	++/+	0	+?/0?	+/0		+/-	0	++/	++	++		?	0?	0?	0	-	-	0	++
H2095	0	0	++?/	+	-	+/-	0	++/ ?	+	++	-	-?	?	-?	0	-	-	0	++
H2096	0	0	+?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H2100	+/	0	+?/ ?	+/		+/	0	++/ ?	++	++		?	0?	?	0	-	-	0	++
H2148	++	0	+?	+		++	0	++/?	+	++	-	-?	0?	0?	0	-	-	0	++
H2149	++	0	++?	+	-	+	0	++	+	++	+	+?	0?	-?	0	-	+?	0	++
H2159	++/	0	++?/?	+/	-	+/	0	++	+		-	-?	0?	0?	0	-	-	0	

Sites with one or more significant negative effect

- 4.86 Out of the 859 site options, 528 (61%) have been found to have a likely significant negative effect on at least one of the SA objectives (not taking into account mixed effects that include a partial significant negative effect). Therefore, there are a large number of residential site options (331 in total) in Kirklees that are relatively unconstrained in sustainability terms.
- 4.87 A total of 283 site options (33% of the total) are likely to have a significant negative effect on only one SA objective, and only 50 (6%) of the 859 sites would have a significant negative effect on four or more SA objectives.
- 4.88 The purpose of the SA is not to identify sites that should or should not be allocated for development, as the SA is one of a number of tools to inform the Council's decision making. However, it is clear from the findings of the SA that there are sites that would be more likely to have a number of negative sustainability effects than others and it may therefore be that those sites are less appropriate for residential development. However, it is recognised that there is potential to mitigate many of the potential negative effects identified (in particular through development of appropriate policy safeguards within the Local Plan), and several of the effects are uncertain depending on the eventual development proposals that come forward for a site, as described earlier in this section.
- 4.89 **Table 4.2** overleaf shows the SA scores for the 50 sites that have been shown to have likely significant negative effects on four or more of the SA objectives. The sites are shown in order of the number of likely significant negative effects identified, with those that have four being listed first.

Table 4.2: SA Scores for the 50 Residential Site Options with Four or More Likely Significant Negative Effects SA objective Sustainable Transport Services and Facilities Historic Environment and Climate change o land Efficient use Biodiversity **Employment** Landscape 14: Biodivers geodiversity Recreation Efficient Pollution Flooding Education Economy Housing Amenity Waste Health Crime naterials Site 5 .. ? .. <u>...</u> ö 9 5 6 option ώ 6 2 2 ++/--0 ? 0? 0 0 Н4 ? H647 0 0 0? 0 0 -? H752 0 0 0? 0 0 H178 ++ -? 0 0 0? 0 0 ++?/-++/--0 +/--+/--0 ? 0 0 ++ _ ++ H257 ? H822 -? 02 0 0 0 0 H1765 0 0 0? 0 0 ++/---_ -? 0 0 0? 0 0 _ H1766 ++/--++/--+?/--? +/--0 -? 0 0 0 H1777 ? _ -? ? 0 0 0? 0 0 H95 ? H154 0 +? ? -? 0 0 0 ++ + 0 +? 0 H238 ? 0? 0 0 -? 0 0 ++?/-++/--++/--+/--? 0 +/--0 0 0 H256 ? ? -? H534 0 0 0? 0? 0 0 ++ H584 +/--? 0 0 ++ 0 0 H619 0 0 0 0 ++?/-? ++/--++/--0 +/--+/--? 0 0 0 H672 ++?/ ++/0 +/-0/--0 --? 0? 0? 0 0 ++ H279 0? H307 --? ? 0? 0 0 ++ 0 0 +?/--++/--0/--0/--0 0 -? 0 0 ++ ++ 0? H505 ++/--+/--++? --? ? 0 0 +/--+/--0 ++ 0 H588 ++/-0 --? ++/--++/-0 0? 0 0 H1783 ++/-0 +? 0 -? 0? 0 0 + H41 ? -? H51 0 0 0 0 H106 0 ? 0 0 0 ++?/ ++/----? 0 + ++/+ 0 ++ ++ 0? 0 0 ++ H129 +? ++?/ ++/---? ++ 0 +/0 ++/0 0 ++ 0? 0? 0 0 + H147 ? 0? +?/-++/--+/--+/--0 --? 0? 0 0 0 ++ ++ ++ ++ H169 H188 ? -? ++ 0 0 0 0 ++?/ ++/--+/0 ++ 0 ++/0 0 ++ ++ --? 0? 0 _ 0 ++ H222 +? ++/-0 0 ++? 0 ? 0 0 ++ + + /0++ ++ H223 ? ++/-++/+ ++? +/0 --? 0? 0 0 0 0 ++ ++ ++ H231 ? +?/---? ? 0 -0 -0 0 + ++ H255 H259 0/-+/0 +/0 0? 0 0 ++ ++ ++ 0 0 ++?/ 0/++ 0 --/+ 0 ? 0 0 ++ H265 +? ? ++/-+? +/0 +/--+ + /0Ω Λ 0? 0 0 ++ + H274 +?/--? H275 ++/--+/--+/--? 0? 0 0 0 0 +?/---? ? 0/--0 +/--+/--0 -? 0 0 H330 ? ++/-++? ++ ++ 0 0 ++ 0? 0 0 H484 ? ++/-? ++/0 0 +?/-? ++/-+/--0 0 0 + ++ H485

									SA ob	jective	es								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
H542	++/	0	+?/ ?	0		+	0	++/?	++	+		?	?	?	0	-	-	0	+
H586	++/	0	++?/?	+/		0/	0	++/?	++	+		?	0?	?	0	-	-	0	+
H608	0	0	+?/0?	+/0		+/-	0	++	++	++		?	0?	?	0	-	-	0	++
H629	+	0	+?	+		0	0	++	++	++		?	?	?	0	-	-	0	++
H676	+	0	++?/	+		++/+	0	++/?	++	++		?	0?	?	0	-	-	0	++
H721	+	0	+?	+		+	0	++/?	++	++		?	0?	?	0	-	-	0	++
H1718	+	0	++?/	+		++/0	0	++/?	++	++		?	?	?	0	-	-	0	++
H1792	++/+	0	++?/ 0?	+		+/-	0	++/?	++	+		?	?	-?	0	-	-	0	+
H1795	++/	0	++?/?	++/		+/	0	++/?	++			-?	0?	0?	0	-	-	0	
H2100	+/	0	+?/ ?	+/		+/	0	++/?	++	++		?	0?	?	0	-	-	0	++

5 SA Findings for the Employment Site Options

- 5.1 This section presents the SA findings for the employment site options that were considered by Kirklees Council for allocation in the Local Plan.
- 5.2 A total of 88 reasonable alternative employment site options have been subject to SA by LUC on behalf of the Council. A set of assumptions was devised to ensure that this large number of reasonable site options could be appraised consistently these assumptions are presented in **Appendix 4** (see Table A4.2).
- 5.3 The likely effects of the employment site options are summarised below in relation to each SA objective. Particular consideration has been given to the likely significant effects identified (both positive and negative), in line with the requirements of the SEA Regulations. Where relevant, effects are classified as short, medium or long-term. Consideration is also given to potential mitigation measures that could reduce or offset the negative effects identified, including mitigation that may be provided by policies in the emerging Local Plan.
- 5.4 The SA scores for all of the employment site options are presented in **Table 5.1** at the end of the chapter, and the detailed SA matrices for the employment site options are available in the separate **Annex 2**.
- 5.5 **Annex 2** also includes the maps that are referred to throughout this section. Those maps show the locations of the site options that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives. In a small number of cases where relevant, minor positive and negative effects are also mapped.
- Due to the large number of site options considered, it is not possible to describe all of the individual sites that are likely to have positive or negative effects on particular SA objectives. Therefore, the summary focuses on the key messages coming out of the SA and identifies the key issues of relevance to the Council's decision making regarding which sites to allocate for employment development in the Local Plan (as described in **Chapter 2**, this summary was provided to the Council before the Draft Local Plan was finalised, in order that the findings could be used to inform decision making). Along with the SA findings, other factors were also taken into account by the Council including the deliverability of the sites and how they fit into the overall spatial strategy. Information about the reasons for selecting or rejecting each employment site option is provided in **Appendix 5**.

Summary of effects by SA objective

SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible

- 5.7 The allocation of new employment sites in any location is likely to have a positive effect on this objective by ensuring that new job opportunities are provided to match the population growth that is being planned for within the Local Plan. Effects will be particularly positive where sites are large in size as they will result in the creation of more jobs.
- 5.8 Thirty-two (36%) of the 88 employment site options are relatively large in size (over 5ha) and so are likely to have a significant positive effect on this SA objective. The remaining 56 (64%) employment site options are likely to have a minor positive effect as they are smaller than 5ha in size.
- 5.9 The locations of the sites that are likely to have significant positive effects are shown in **Map E1**.

 There is no particular pattern in relation to the geographical location within the District of the sites

that are likely to have a significant positive effect; rather this is determined purely on the basis of the site size.

5.10 While allocating larger sites may offer efficiencies in terms of meeting the District's employment land requirements through the development of fewer sites, it could also mean that employment development is less dispersed throughout the District, which could result in it being easily accessible from a more limited number of locations. Issues to do with the accessibility of the employment site options are considered under SA objectives 10 and 19 below.

SA objective 2: Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship

- 5.11 Similarly to SA objective 1 above, the allocation of new employment sites in any location is likely to have a positive effect on this objective by encouraging economic growth. Effects will be particularly positive where sites are large in size.
- 5.12 As described above in relation to SA objective 1, 32 of the 88 of the employment site options are relatively large in size (over 5ha) and so are likely to have a significant positive effect. The remaining 56 employment site options are likely to have a minor positive effect as they are smaller than 5ha in size.
- 5.13 As also described above under SA objective 1, the locations of the sites that are likely to have significant positive effects on SA objective 2 are shown in **Map E1** and again, effects on this objective can be seen to depend purely on the size of the sites rather than their geographical location within the District.

SA objective 3: Ensure education facilities are available to all

5.14 The location of employment sites will not have a direct effect on ensuring that education facilities are available for all; therefore all of the options are likely to have a negligible effect. No likely significant effects, either positive or negative, were identified for any of the employment site options.

SA objective 4: Improve the health of local people and ensure that they can access the health and social care they need

5.15 The location of employment sites will not have a direct effect on the health of local people or ensuring that they can access health and social care; therefore all of the options are likely to have a negligible effect. No likely significant effects, either positive or negative, were identified for any of the employment site options.

SA objective 5: Protect local amenity including avoiding noise and light pollution

- 5.16 Where employment development is proposed within close proximity of sensitive receptors there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase but also potentially during the operational phase depending on the nature of the commercial activities that eventually take place at the site.
- 5.17 Two (2%) of the employment site options (E1825 and E1828) are likely to have a significant negative effect on local amenity because they are surrounded by existing residential development or other sensitive receptors. A further 68 (77%) of the employment site options could have a minor negative effect as while they are not immediately surrounded by existing residential development or other sensitive receptors, they have such receptors within 100m. The locations of the sites which could have negative effects are shown in **Map E2** and it can be seen that they are mainly located in the north of Kirklees, close to the main urban areas.
- 5.18 The remaining 18 (20%) employment site options are not within 100m of residential development or other sensitive receptors so would have a negligible effect on SA objective 5.
- 5.19 Therefore, when considering which site options to allocate in the Local Plan, proximity to sensitive receptors should be taken into account and appropriate mitigation will need to be built into the plan and specific development proposals for the sites, e.g. noise buffers. Measures such as

enforcing the use of good practice construction techniques may help to reduce the short-term impacts associated with construction; however there is inevitably a balance to be struck between locating employment development in the urban areas of Kirklees that are accessible for the highest number of people, and the need to protect the amenity of residents in those areas.

SA objective 6: Retain and enhance access to local services and facilities

5.20 The location of employment sites is not expected to have a direct effect on this objective, with effects being determined more by the location of residential sites (which have been appraised separately). Therefore, all of the employment site options are considered likely to have a negligible effect on retaining and enhancing access to local services and facilities. No likely significant effects, either positive or negative, were identified for any of the employment site options.

SA objective 7: Make our communities safer by reducing crime, anti-social behaviour and the fear of crime

- 5.21 It is possible that the provision of job opportunities resulting from the allocation of new employment sites could help to improve overall levels of prosperity in Kirklees, thereby reducing the levels of crime; however this would be an indirect effect and cannot be assumed.
- 5.22 The effects of new employment developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within the employment sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night when employment sites are likely to be quiet. However, such issues will not be influenced by the location of employment sites (rather they will be determined through the detailed proposals for each site) and as such the effects of all of the potential employment sites on this SA objective are negligible. No likely significant effects, either positive or negative, were identified for any of the employment site options.

SA objective 8: Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage

- 5.23 The effects of the employment site options on this SA objective will partly depend on the proximity of open space and green infrastructure which can be used by employees during breaks, and will also be influenced by whether any recreation facilities/areas of open space/green infrastructure would be lost due to development of the sites for employment.
- 5.24 Almost all (86 out of 88) of the employment site options are within 600m of two or more areas of open space or playing fields/sports facilities and so are likely to have a minor positive effect on this objective. Due to the nature of the development proposed (i.e. employment rather than residential), positive effects are not expected to be significant. The locations of those sites are shown in **Map E3** and it can be seen that they are located mainly in the northern and central areas of Kirklees, reflecting the overall distribution of the employment site options.
- 5.25 However, 42 (49%) of the employment site options that are likely to have a minor positive effect could also have a significant negative effect (resulting in a mixed effect overall). This is because those sites include either existing open space, recreation facilities or Public Rights of Way and employment development could therefore reduce access to those facilities by nearby residents or result in their loss. However, this effect is in all cases uncertain as it cannot yet be known whether the recreation asset would be lost due to the development, or access restricted in the short or longer term (e.g. Public Rights of Way could be diverted). The locations of those sites are also shown in **Map E3** and are dispersed fairly evenly throughout the District.
- 5.26 The remaining two (2%) employment sites are within 600m of fewer than two areas of open space or playing fields/sports facilities and so are likely to have a minor negative effect on access to recreation. Due to the nature of the development proposed, negative effects associated with access to nearby features are not likely to be significant.
- 5.27 Therefore, while levels of access to recreation and leisure facilities are generally good for almost all of the employment site options, careful consideration will need to be given to the design and

layout of the sites that are allocated to ensure that features such as Public Rights of Way that cross through sites are incorporated into the development or adequately diverted, in order to avoid negative effects resulting from their loss. Alternatively, consideration should be given to whether it is possible to replace those features with equivalent or better provision elsewhere.

SA objective 9: Ensure all people are able to live in a decent home which meets their needs

5.28 The location of employment sites is not considered likely to affect housing provision; therefore negligible effects are likely for all of the employment site options. No likely significant effects, either positive or negative, were identified for any of the employment site options.

SA objective 10: Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport

- 5.29 Accessibility 'heatmapping' work that has been undertaken on behalf of Kirklees Council has been analysed by the Council to identify the number of working age people (taken to be those aged 16-64) that live within 20 minutes travel time of each employment site option, taking into account only non-car based modes of transport. The employment site options have all been shown to have working age people living within 20 minutes travel time using non-car based modes of transport; however the number of working age people within 20 minutes of each site ranges significantly from 941 to 54,845 people. Where more working age people are able to access employment sites via sustainable transport it is assumed to be more likely that people will use non-car based modes of transport to commute, resulting in positive effects on this SA objective.
- 5.30 Twenty (23%) of the 88 employment site options are likely to have a significant positive effect as they could be accessed via sustainable transport within 20 minutes by more than 25,000 people. The locations of those sites are shown in **Map E4** and it can be seen that they are mainly located in the more urban areas of Kirklees, in the north of the District and in Huddersfield.
- 5.31 A further 65 (74%) of the sites could be accessed via sustainable transport within 20 minutes by between 5,000 and 25,000 people and so are likely to have a minor positive effect and the remaining three (3%) sites could be accessed via sustainable transport within 20 minutes by fewer than 5,000 people so are likely to have a negligible effect.
- 5.32 Therefore, if employment sites are allocated in the more urban areas of north Kirklees there are likely to be the most positive effects in terms of enabling people to use sustainable transport to travel to and from work; however this needs to be balanced with other issues such as amenity, as described under SA objective 5 above.

SA objective 11: Secure the efficient and prudent use of land

- 5.33 Where employment development takes place on greenfield land or areas of high quality agricultural land it is a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land. None of the site options are likely to have a significant negative effect attributed to being on Grade 1 agricultural quality land, as there is none of this in Kirklees.
- 5.34 Twenty four (27%) of the 88 employment site options are likely to have a significant negative effect on this SA objective because they are relatively large in size (over 5ha) and are entirely or mainly on greenfield land. The locations of those sites are shown in **Map E5** and can be seen to correlate broadly with the extensive areas of Grade 3 agricultural land which are mainly located in the north, central areas and east of Kirklees. Seven (8%) of the employment site options are relatively large (over 5ha) and are entirely or mainly on brownfield land, so are likely to have a significant positive effect. The locations of those sites are shown in **Map E6**.
- 5.35 If employment development is located in the southern parts of the District it will be easier to avoid the loss of high quality agricultural land. However, this needs to be balanced with the wider sustainability disadvantages of locating development further from the main urban centres. If brownfield sites in any part of the District are allocated for employment development, consideration should be given to the extent to which it may be possible to make use of onsite buildings and materials.

SA objective 12: Protect and enhance the character of Kirklees and the quality of the landscape and townscape

- 5.36 A small area in the south of Kirklees lies within the Peak District National Park. Development within that part of the District could therefore have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known. Only one (1%) of the employment site options (E1849) is located within 500m of the National Park and so could have a significant negative effect on the landscape for that reason (although as the site is also small and on brownfield land, this is part of a mixed effect overall (minor positive and significant negative)). Therefore, proximity to the National Park is not the key determinant of the likely significant effects that have been identified in relation to this SA objective; however if that site is eventually allocated in the Local Plan it will be particularly important to ensure that mitigation is built into the Local Plan policies and the detailed proposals for the site to avoid adverse impacts.
- 5.37 Outside of designated landscape areas, where development will take place on greenfield land, the character of the local environment is more likely to be affected and larger sites are more likely to have a more prominent impact than smaller sites. Where a brownfield site is redeveloped it is likely that the overall character and appearance of the site will be improved as a result of new development, which is assumed to be of high quality, and this may benefit the appearance of the landscape/townscape.
- 5.38 Twenty four (27%) of the 88 employment site options are large sites (over 5ha) and are entirely or mainly on greenfield land so may have a significant negative effect on this objective for that reason. The locations of the employment site options that could have an entirely or partly significant negative effect on the landscape are shown in **Map E7**. Apart from the site that is located near to the National Park in the south of Kirklees, the sites that are likely to have significant negative effects on the landscape are distributed fairly widely throughout the District with no particular geographical pattern. A further 42 (48%) of the employment site options may have a minor negative effect as they are small in size but are entirely or mainly on greenfield land. All of the potential negative effects are uncertain depending on the design of new development and the incorporation of mitigation such as screening through planting.
- 5.39 The remaining 21 (24%) sites are on brownfield land and are more than 500m from the National Park, so could have a minor positive effect (also shown on **Map E7**). However, this is again uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously.
- 5.40 No likely significant positive effects were identified in relation to any of the employment site options.
- 5.41 Information from the emerging Kirklees Landscape Character Assessment has also been taken into account in the SA and should also inform the Council's decision making regarding which sites to take forward, as well as specific proposals for the sites that are eventually allocated.

SA objective 13: Conserve and enhance the historic environment, heritage assets and their settings

- 5.42 Judgements about the likely effects of the employment site options on the historic environment have been based on information provided by Historic England (formerly English Heritage). Each site has been rated by Historic England as either red, orange, yellow or green based on what it considers to be the likely effects on the historic environment of developing the site in question. Those judgements have been converted directly into SA scores as described in the SA assumptions in **Appendix 4** (see Table 4.2).
- None of the employment site options were rated by Historic England as 'red' on the basis that the development of the site is likely to result in substantial harm to a designated heritage asset.

 Therefore, no likely significant negative effects on this SA objective have been identified.
- 5.44 Nine (10%) of the employment site options could have a minor negative effect as they were assessed by Historic England as 'yellow', meaning that the allocation of the site could impact on a designated heritage asset, but its development is unlikely to result in harm to that asset if the

development accords with the anticipated Local Plan policies for managing change to the historic environment. The locations of the sites that could have a minor negative effect on SA objective 13 are shown in **Map E8**. Most are located in the more urban areas of Kirklees, in and around Huddersfield, Batley and Dewsbury, where there is a denser concentration of heritage assets such as listed buildings in comparison to the rural areas. However, in all cases the potential effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).

- 5.45 A further 17 (19%) of the site options have been identified as having uncertain effects on SA objective 13 as they were classified by Historic England as 'orange' because their likely effects on the historic environment are uncertain. The remaining 62 (70%) sites were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those 67 sites are therefore most likely to have a negligible effect on this SA objective, although this is again uncertain.
- 5.46 No likely positive effects (minor or significant) on this SA objective were identified in relation to any of the employment site options.
- 5.47 If the Council is considering allocating any of the sites that have been identified as having potential negative effects on the historic environment, the detailed information provided by Historic England about the heritage features that could be affected by development should be drawn on, and consideration given to the potential for mitigation. Any mitigation that is required should be included in the relevant Local Plan policies relating to the historic environment generally, but also specifically to the allocated sites in question.

SA objective 14: Maximise opportunities to protect and enhance biodiversity and geodiversity

- 5.48 Employment sites that are within close proximity of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, trampling etc. Conversely, there may be opportunities to promote habitat connectivity if employment developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists as the distance and pathways across which effects might occur are not the same for all types of habitats and species, and appropriate mitigation may avoid adverse effects and may even result in beneficial effects.
- In addition to potential effects on nearby designated sites, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment (as site surveys are not undertaken). This would need to be determined once more specific proposals are developed and submitted as part of a planning application. Distances of 250m and 1km have been used as an indication of proximity, as there are no standard distance thresholds available and it is recognised that the distance over which effects may occur vary between habitats and species and the types of effect being considered. This level of detail cannot be determined as part of the SA. In relation to impacts on European sites, the findings of the Habitats Regulations Assessment (HRA) will be taken into account in the SA as they become available.
- 5.50 Of the 88 employment site options, 25 (28%) were identified as having a potentially significant negative effect on this SA objective as they are within 250m of one or more designated biodiversity or geodiversity sites. The locations of those site options are mapped in **Map E9**. Most of the sites that could have a significant negative effect on biodiversity are located outside of the main urban centres, reflecting the location of the majority of the District's designated nature conservation sites. Therefore, focussing most development in the central areas of the towns in Kirklees may help to steer development away from designated sites. However, urban areas can still harbour valuable biodiversity and the need to incorporate mitigation for impacts on non-designated features should be addressed by the Council as it prepares the relevant Local Plan policies.

- 5.51 A further 31 (35%) of the employment site options were identified as having a potential minor negative effect on this SA objective as they are between 250m and 1km from a designated biodiversity or geodiversity site. The remaining 32 (36%) of the employment site options are most likely to have a negligible effect although this is uncertain until the design and layout of the sites are known, as there may be opportunities to incorporate biodiversity enhancements.
- 5.52 No likely positive effects (minor or significant) on this SA objective were identified in relation to any of the site options.

SA objective 15: Reduce air, water and soil pollution

- 5.53 The location of employment developments within Kirklees would not have a direct effect on levels of soil or water pollution, which would be influenced by factors such as whether there is capacity at the District's sewage treatment works to treat the additional wastewater generated by the overall scale of development proposed (this will be considered separately in relation to the Local Plan policies addressing the quantum of development that will be provided in Kirklees). Potential impacts on soil are discussed under SA objective 11 above, which considered potential impacts of employment site options on best and most versatile agricultural land. Therefore, the effects of almost all of the 92 employment site options on this SA objective are negligible, with only one site (E1838) having a likely significant negative effect in relation to air pollution as described below.
- 5.54 Development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic from population growth in those areas could compound existing air quality problems. Those AQMAs are located in the north of the District one covers two sections of the Leeds Road A62 (in the vicinity of the junctions with the A6107 Bradley Road, and with the A644) and the other is along part of the Huddersfield Road A644.
- Only one of the employment site options (E1838) was identified as likely to have a significant negative effect on this SA objective as it is within very close proximity of the AQMA along Huddersfield Road. The location of this site and the AQMAs are shown in **Map E10**. If this site is eventually allocated for development it will be particularly important to ensure that mitigation is built into the Local Plan and specific proposals for the site, in relation to the provision of sustainable transport links to reduce car use amongst employees.
 - SA objective 16: Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people
- 5.56 While it is recognised that new development in any location may offer good opportunities to incorporate SuDS, employment development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. National Planning Practice Guidance identifies offices and general industry as a 'less vulnerable use', which is suitable in areas of flood zone 1, 2 and 3a but is unsuitable in flood zone 3b.
- 5.57 While new development in any location may offer good opportunities to incorporate SuDS, and therefore have a positive effect on reducing flood risk, this would depend on the design of the proposed development and not on the location of the site.
- 5.58 Four (5%) of the employment site options (E1748, E1871, E1880 and E1891) are likely to have a significant negative effect on this SA objective as they are entirely or mainly on greenfield land that is within flood zone 3b. The locations of those sites are mapped in **Map E11**, which also shows the location of flood zone 3 in Kirklees. It can be seen that the parts of the District that are at the highest risk from fluvial flooding are in the north and centre of Kirklees, around the rivers Colne (north-east of Huddersfield) and Calder (east of Mirfield and south of Dewsbury). Across the District there are other smaller areas of flood zones 2 and 3, particularly around Fenay Beck (east of Almondbury), river Holme (south of Huddersfield), river Colne (south-west of Huddersfield) and the river Spen around Heckmondwike.

- 5.59 If any of those four sites are taken forward for development it is therefore essential that appropriate mitigation is incorporated; this may involve only developing the part of a site which is outside of flood zone 3b and instead using that land for open space. The sequential test would also need to have demonstrated that there are no suitable sites in lower areas of flood risk that could be allocated instead.
- 5.60 A further 64 (73%) sites are likely to have a minor negative effect on this SA objective as they are entirely or mainly on greenfield land (although are outside of flood zone 3b) and development of those sites would therefore reduce the extent of permeable surfaces in the District.
- 5.61 The remaining 20 (23%) employment site options are on brownfield land outside of flood zone 3b and therefore are identified as having a negligible effect. However, mitigation measures such as SuDS should be designed into all new developments to reduce the impermeable surfaces created in the District and reduce the risk of surface water flooding, and not just reserved for those development sites in the high flood risk zones.

SA objective 17: Increase prevention, re-use, recovery and recycling of waste close to source

- 5.62 All new employment development will inevitably involve an increase in waste generation, but may also offer good opportunities for incorporating sustainable waste management practices, regardless of the location. Where development is proposed on brownfield land, there may be good opportunities for using existing buildings and materials.
- 5.63 Sixty-five (74%) of the employment site options are on greenfield land and so are likely to have a minor negative effect on this objective. The locations of those sites are mapped in **Map E12** and it can be seen that they are mainly in and around the urban areas in the north of Kirklees. The remaining 23 (26%) employment site options are on brownfield land so may have a minor positive effect on this objective although this is uncertain depending on the previous use of the site.
- 5.64 No likely significant effects, either positive or negative, were identified for any of the employment site options in relation to this SA objective.

SA objective 18: Increase efficiency in water energy and raw material use

- 5.65 While all new employment development is likely to involve an increase in energy and water consumption this will not be influenced by the location of employment sites. In addition, new development may offer good opportunities for incorporating renewable energy generation and water efficiency measures and it is assumed that new development will be built to high standards of efficiency.
- 5.66 Similarly, all employment development will result in the increased consumption of minerals for construction but this will not be influenced by the location of employment sites. The location of development sites can influence the efficient use of minerals by the proximity of the development to Minerals Safeguarding Areas as development in those areas may sterilise mineral resources and restrict the availability of resources in the District. However, because of the extent of minerals resources within Kirklees, all sites would have the same effect. In addition, not all of the resources would necessarily be economically viable and it may be possible to achieve prior extraction to avoid sterilisation. Therefore, all of the employment site options would have a negligible effect on this SA objective and no likely significant effects (either positive or negative) were identified for any of the site options.

SA objective 19: Reduce the contribution that the District makes to climate change

5.67 The location of employment development will not affect the contribution that the buildings make to climate change, which will be influenced by other factors such as how energy efficient the building is and the nature of commercial activities at the site. However, where employment sites are well-connected by sustainable transport links to residential areas, levels of car use and the associated greenhouse gas emissions are likely to be lower. Therefore, as for SA objective 10 above, the scores for this objective are based on the Council's analysis of the heat mapping work

- that has been carried out for Kirklees Council and takes into account how many working age people would be able to access the site within 20 minutes via sustainable modes of transport.
- 5.68 As described under SA objective 10 above, 20 of the 88 (23%) employment site options are likely to have a significant positive effect on reducing emissions from car use as they could be accessed via sustainable transport within 20 minutes by more than 25,000 people. The locations of those sites are shown in **Map E4** and it can be seen that they are mainly located in the more urban areas of Kirklees, in the north of the District and in Huddersfield.
- 5.69 A further 65 (74%) of the sites could be accessed via sustainable transport within 20 minutes by between 5,000 and 25,000 people and so are likely to have a minor positive effect and the remaining three (3%) sites could be accessed via sustainable transport within 20 minutes by fewer than 5,000 people so are likely to have a negligible effect.
- 5.70 Therefore, if employment sites are allocated in the more urban areas of north Kirklees there are likely to be the most positive effects in terms of enabling people to use sustainable transport to travel to and from work and therefore reducing greenhouse gas emissions from car use.

Summary of SA findings for the employment site options

5.71 **Table 5.1** overleaf shows the SA scores for all of the 88 employment site options.

Table 5.1: SA scores for all 88 employment site options

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Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
E1876	+	+	0	0	-?	0	0	+/?	0	+	-	-?	0?	0?	0	-	-	0	+
E1877	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	0?	0	-	-	0	+
E1878	++	++	0	0	-?	0	0	+	0	++	++/-	+?	0?	-?	0	0	+?	0	++
E1879	+	+	0	0	0	0	0	+	0	+	-	-?	-?	-?	0	-	-	0	+
E1880	+	+	0	0	0	0	0	+	0	+	-	-?	-?	-?	0		-	0	+
E1881	++	++	0	0	-?	0	0	+/?	0	+		?	0?	-?	0	-	-	0	+
E1882	++	++	0	0	-?	0	0	+/?	0	+	++	+?	0?	0?	0	-	+?	0	+
E1883	++	++	0	0	-?	0	0	+	0	+	++	+?	0?	-?	0	0	+?	0	+
E1884	++	++	0	0	-?	0	0	+/?	0	++		?	0?	-?	0	-	-	0	++
E1885	+	+	0	0	-?	0	0	+	0	+	-	-?	-?	?	0	-	-	0	+
E1886	++	++	0	0	-?	0	0	+/?	0	+	++	+?	0?	?	0	0	+?	0	+
E1887	+	+	0	0	0	0	0	+	0	++	-	-?	0?	?	0	-	-	0	++
E1888	+	+	0	0	0	0	0	+/?	0	++	-	-?	?	?	0	-	-	0	++
E1889	++	++	0	0	-?	0	0	+/?	0	+		?	?	?	0	-	-	0	+
E1890	+	+	0	0	0	0	0	+	0	+	+	+?	-?	?	0	-	+?	0	+
E1891	+	+	0	0	-?	0	0	+/?	0	+	-	-?	0?	-?	0		+?	0	+
E1892	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	?	0	-	-	0	+
E1893	++	++	0	0	-?	0	0	+	0	+	++	+?	0?	-?	0	0	+?	0	+
E1894	+	+	0	0	-?	0	0	+/?	0	+	+	+?	-?	0?	0	0	+?	0	+
E1895	+	+	0	0	0	0	0	+	0	+	-	-?	0?	?	0	-	-	0	+
E1896	+	+	0	0	-?	0	0	+/?	0	+	+	+?	0?	0?	0	0	+?	0	+
E1897	+	+	0	0	-?	0	0	+	0	++	-	-?	0?	-?	0	-	-	0	++
E1898	++	++	0	0	-?	0	0	+	0	+	++	+?	-?	?	0	0	+?	0	+
E1899	+	+	0	0	-?	0	0	+	0	++		-?	0?	-?	0			0	++
E1900	+	+	0	0	-?	0	0	+/?	0	+	-	-?	0?	?	0	-	-	0	+
E1984	+	+	0	0	-?	0	0	+	0	++	+	+?	0?	0?	0	0	+?	0	++
E1985	++	++	0	0	-?	0	0	+/?	0	0		?	0?	?	0	-	-	0	0
E1986	+	+	0	0	0	0	0	+	0	+	+	+?	0?	0?	0	0	+?	0	+
E1987	+	+	0	0	-?	0	0	+	0	++	+	+?	0?	0?	0	0	+?	0	++
E1988	+	+	0	0	-?	0	0	+	0	++	-	-?	0?	0?	0	-	-	0	++
E1989	+	+	0	0	0	0	0	+	0	++	-	-?	0?	-?	0	-	-	0	++
E1990	+	+	0	0	-?	0	0	+/?	0	+	+	+?	0?	-?	0	0	+?	0	+
E1992	++	++	0	0	-?	0	0	+/?	0	+		?	0?	?	0	-	-	0	+
E1993	++	++	0	0	0	0	0	+/?	0	+	++	+?	0?	0?	0	-	+?	0	+
E1996	++	++	0	0	-?	0	0	+/?	0	+		?	?	-?	0	-	-	0	+
E1997	+	+	0	0	-?	0	0	+	0	+	+	+?	0?	-?	0	0	+?	0	+
E2102	++	++	0	0	-?	0	0	+/?	0	++		?	0?	-?	0	-	-	0	++
E2135	++	++	0	0	-?	0	0	+/?	0	+		?	0?	-?	0	-	-	0	+
E2311 E2333	++	++	0	0	0 -?	0	0	+/? +/?	0	+		? ?	?	0? 0?	0	-	-	0	+
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Sites with one or more significant negative effect

- 5.72 Out of the 88 site options, 47 (53%) have been found to have a likely significant effect on at least one of the SA objectives (not taking into account mixed effects that include a partial significant negative effect). Therefore, there are a large number of employment site options (41 in total or 47%) in Kirklees that are relatively unconstrained in sustainability terms.
- 5.73 The highest number of likely significant effects identified for any one employment site is three a total of eight (9%) of the options are likely to have a significant negative effect on three SA objectives. Twenty-one of the 88 (24%) sites would have a significant negative effect on only one of the SA objectives.
- 5.74 The purpose of the SA is not to identify sites that should or should not be allocated for development, as the SA is one of a number of tools to inform the Council's decision making. However, it is clear from the findings of the SA that there are sites that would be more likely to have a number of negative sustainability effects than others and it may therefore be that those sites are less appropriate for employment development. However, it is recognised that there is potential to mitigate many of the potential negative effects identified (in particular through development of appropriate policy safeguards within the Local Plan), and several of the effects are uncertain depending on the eventual development proposals that come forward for a site, as described earlier in this section.
- 5.75 **Table 5.2** overleaf presents the SA scores for the 47 sites that have been shown to have likely significant negative effects on one or more of the SA objectives. The sites are listed in order of the number of likely significant negative effects identified, with those that have three being listed first.

Table 5.2: SA scores for the employment site options with at least one likely significant negative effect

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Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
E1748	++	++	0	0	-?	0	0	+	0	+		?	?	0?	0		-	0	+
E1826	++	++	0	0	0	0	0	+	0	+		?	0?	?	0	-	-	0	+
E1828	++	++	0	0	?	0	0	+	0	++		?	0?	0?	0	0	-	0	++
E1850	++	++	0	0	-?	0	0	+/?	0	+		?	0?	?	0	-	-	0	+
E1865	++	++	0	0	-?	0	0	+/?	0	+		?	-?	?	0	-	-	0	+
E1889	++	++	0	0	-?	0	0	+/?	0	+		?	?	?	0	-	-	0	+
E1985	++	++	0	0	-?	0	0	+/?	0	0		?	0?	?	0	-	-	0	0
E1992	++	++	0	0	-?	0	0	+/?	0	+		?	0?	?	0	-	-	0	+
E1827	++	++	0	0	-?	0	0	+/?	0	+		?	0?	0?	0	-	-	0	+
E1830	++	++	0	0	-?	0	0	+	0	+		?	?	0?	0	_	-	0	+
E1831	++	++	0	0	-?	0	0	+	0	+		?	0?	-?	0			0	+
E1832	++		0	0	-?	0	0	+/?	0	+		?	?	0?	0			0	+
E1833	_	++	0	0	-: -?	0	0	+/?	0			?	?	0?	0			0	
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E1834	++	++	0	0		0	0	+/?	0	+		?		0?	0	-	-	0	+
E1851	++	++	0	0	0	0	0	+	0	+		?	0?	0?	0	-	-	0	+
E1860	++	++	0	0	-?	0	0	+/?	0	+		?	0?	0?	0	-	-	0	+
E1871	+	+	0	0	-?	0	0	+/?	0	+	-	-?	0?	?	0		-	0	+
E1875	++	++	0	0	-?	0	0	+/?	0	++		?	0?	0?	0	-	-	0	++
E1881	++	++	0	0	-?	0	0	+/?	0	+		?	0?	-?	0	-	-	0	+
E1884	++	++	0	0	-?	0	0	+/?	0	++		?	0?	-?	0	-	-	0	++
E1996	++	++	0	0	-?	0	0	+/?	0	+		?	?	-?	0	-	-	0	+
E2102	++	++	0	0	-?	0	0	+/?	0	++		?	0?	-?	0	-	-	0	++
E2135	++	++	0	0	-?	0	0	+/?	0	+		?	0?	-?	0	-	-	0	+
E2311	++	++	0	0	0	0	0	+/?	0	+		?	?	0?	0	-		0	+
E2333	++	++	0	0	-?	0	0	+/?	0	+		?	?	0?	0	-	-	0	+
E1824	+	+	0	0	-?	0	0	-	0	+	-	-?	0?	?	0	-	-	0	+
E1825	+	+	0	0	?	0	0	+/?	0	+	+	+?	0?	0?	0	0	+?	0	+
E1829	+	+	0	0	-?	0	0	+/?	0	+	-	-?	0?	?	0	-	-	0	+
E1836	+	+	0	0	-?	0	0	+	0	0	-	-?	0?	?	0	-	-	0	0
E1837	+	+	0	0	0	0	0	+	0	++	+	+?	-?	?	0	0	+?	0	++
E1838	+	+	0	0	0	0	0	+	0	++	+	+?	0?	-?		0	+?	0	++
E1839	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	?	0	-	-	0	+
E1840	+	+	0	0	-?	0	0	+/?	0	0	-	-?	0?	?	0	-	-	0	0
E1847	+	+	0	0	-?	0	0	+/?	0	+	-	-?	0?	?	0	-	-	0	+
E1855	+	+	0	0	0	0	0	+	0	++	-	-?	0?	?	0	-	-	0	++
E1866	+	+	0	0	-?	0	0	+/?	0	+	-	-?	0?	?	0	-	-	0	+
E1880	+	+	0	0	0	0	0	+	0	+	-	-?	-?	-?	0		-	0	+
E1885	+	+	0	0	-?	0	0	+	0	+	-	-?	-?	?	0	-	-	0	+
E1886	++	++	0	0	-?	0	0	+/?	0	+	++	+?	0?	?	0	0	+?	0	+
E1887	+	+	0	0	0	0	0	+	0	++	-	-?	0?	?	0	-	-	0	++
E1888	+	+	0	0	0	0	0	+/?	0	++	-	-?	?	?	0	-	-	0	++
E1890	+	+	0	0	0	0	0	+	0	+	+	+?	-?	?	0	-	+?	0	+
E1891	+	+	0	0	-?	0	0	+/?	0	+		-?	0?	-?	0		+?	0	+
E1892	+	+	0	0	-?	0	0	+	0	+	-	-?	0?	?	0	-	-	0	+
E1895	+	+	0	0	0	0	0	+	0	+	-	-?	0?	?	0		-	0	+
E1898	++	++	0	0	-?	0	0	+	0	+	++	+?	-?	?	0	0	+?	0	+
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6 SA Findings for the Mixed Use Site Options

- 6.1 This section presents the SA findings for the mixed use site options that were considered by Kirklees Council for allocation in the Local Plan.
- 6.2 A total of 29 reasonable alternative mixed use site options have been subject to SA by LUC on behalf of the Council. A set of assumptions was devised to ensure that this large number of reasonable site options could be appraised consistently these assumptions are presented in **Appendix 4** (see Table A4.3).
- 6.3 The likely effects of the mixed use site options are summarised below in relation to each SA objective. Particular consideration has been given to the likely significant effects identified (both positive and negative), in line with the requirements of the SEA Regulations. Where relevant, effects are classified as short, medium or long-term. Consideration is also given to potential mitigation measures that could reduce or offset the negative effects identified, including mitigation that may be provided by policies in the emerging Local Plan.
- 6.4 The SA scores for all of the mixed use site options are presented in **Table 6.1** at the end of the chapter, and the detailed SA matrices for the mixed use site options are available in the separate **Annex 3**.
- 6.5 **Annex 3** also includes the maps that are referred to throughout this section. Those maps show the locations of the site options that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives. In a small number of cases where relevant, minor positive and negative effects are also mapped.
- 6.6 **Map MX1** in **Annex 3** shows the locations and boundaries of all of the mixed use site options (the small size of some of the options means that it has been necessary to indicate their location with coloured dots on Maps **MX2-MX20**, rather than the actual site boundary).
- 6.7 The summary focuses on the key messages coming out of the SA and identifies the key issues of relevance to the Council's decision making regarding which sites to allocate for mixed use development in the Local Plan (as described in **Chapter 2**, this summary was provided to the Council before the Draft Local Plan was finalised, in order that the findings could be used to inform decision making). Along with the SA findings, other factors were also taken into account by the Council including the deliverability of the sites and how they fit into the overall spatial strategy. Information about the reasons for selecting or rejecting each mixed use site option is provided in **Appendix 5**.

Summary of effects by SA objective

SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible

- 6.8 The provision of new employment development within a mixed use site in any location is likely to have a positive effect on this SA objective by ensuring that new job opportunities are provided to match the population growth that will result from the Local Plan. Co-locating employment and residential development as part of a mixed use site will have particularly positive effects as this approach will help to ensure that job opportunities are easily accessible for new residents.
- 6.9 Twenty one (72%) of the mixed use site options include both employment development and residential development and so are likely to have a significant positive effect on this objective. The locations of those sites are shown in **Map MX2**.

- 6.10 Four (14%) of the mixed use site options would provide for employment development but no residential development; therefore a minor positive effect is likely for those sites as while they would provide employment opportunities, it would not be co-located with residential development. The locations of those sites are also shown in **Map MX2**. There is no particular pattern in relation to the geographical location within the District of the sites that are likely to have minor and significant positive effects; rather this is determined purely on the basis of the proposed use at each site.
- 6.11 The remaining four sites (MX1907, MX1908, MX1915 and MX1924) would not make provision for any employment development and therefore a negligible effect has been identified for these sites.

SA objective 2: Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship

- 6.12 The provision of new employment development within a mixed use site in any location is likely to have a positive effect on this SA objective by encouraging economic growth.
- 6.13 Twenty-five (86%) of the mixed use site options would make provision for employment development and so are likely to have a minor positive effect. These are the same sites that are shown in **Map MX2** described above as having significant or minor positive effects on SA objective 1.
- 6.14 The remaining four mixed use site options are likely to have a negligible effect as they would not include employment development onsite.

SA objective 3: Ensure education facilities are available to all

- 6.15 The effects of mixed use development (where it incorporates housing) on this objective will depend to some extent on the availability of school and college places to serve the growing population this will depend in part on whether new places are provided as part of the new development, which is unknown at this stage. While new schools may be allocated in the new Local Plan, their potential locations were not taken into account in the appraisal of mixed use site options (incorporating residential development) on this SA objective as there is not enough certainty at this stage about their delivery.
- 6.16 Effects will also depend on how accessible existing schools and colleges are from mixed use site options, although there are uncertainties as the effects will depend on there being capacity at those schools and colleges to accommodate new pupils. Information about access to existing schools was taken from the accessibility heatmapping work that was undertaken for Kirklees Council. The heatmapping work assessed the journey times from each of the mixed use site options that would incorporate residential development, to primary and secondary schools, as well as further education facilities, via sustainable transport modes.
- 6.17 Potential significant positive effects alone were identified in relation to nine (31%) of the 29 options as they would incorporate residential development and are mainly or entirely within 0-15 minutes journey time (via non-car based modes of transport) of a primary school and 0-20 minutes of a secondary school. Some of these sites are also located within 30 minutes travel time of a further education facility. A further 11 (38%) of the mixed use sites would have significant positive effects in relation to part of the site, but negligible or negative effects for the remainder of the site as levels of access to education facilities were very variable within different parts of those sites. The locations of the sites that would have entirely or partly significant positive effects on this SA objective are shown in **Map MX3** and it can be seen that most of these sites are located in the urban areas in the north of Kirklees.
- 6.18 Seven (24%) site options could have a significant negative effect on access to education for part of the site as they would incorporate residential development but they contain areas which are more than 30 minutes from a primary school and more than 40 minutes from a secondary school. No site options were found to have entirely significant negative effects on this objective as none were entirely located more than 30 minutes from a primary school and more than 40 minutes from a secondary school. The locations of the seven site options with partly significant negative effects are shown in **Map MX4**. All are located relatively close to urban areas but they are

- generally quite large sites, which accounts for the relatively poor access to schools from parts of the sites.
- 6.19 Four (14%) of the mixed use site options would have an entirely negligible effect on access to education in Kirklees as they would not incorporate any residential development.

SA objective 4: Improve the health of local people and ensure that they can access the health and social care they need

- 6.20 The location of mixed use sites (where residential development would be incorporated) will not affect the number or location of healthcare facilities; however where healthcare facilities are easily accessible from the sites that would incorporate residential development there will be positive effects on residents' health.
- 6.21 Two (7%) of the 29 mixed use site options are likely to have a significant positive effect on this SA objective as they are within 0-15 minutes journey time (via non-car based modes of transport) of a GP and are also within 0-30 minutes of a hospital. A further four (14%) of the site options are likely to have a significant positive effect as part of a mixed effect overall, where levels of access to healthcare vary considerably within the same site. These sites also contain areas which have varying levels of accessibility to a GP and hospital, meaning that in addition to the significant positive effect likely on this objective a negligible or negative effect has also been identified. The locations of the sites that would have entirely or partly significant positive effects on health are shown in **Map MX5** and it can be seen that they are all located in and around Huddersfield.
- 6.22 A further seven (24%) of the residential site options are likely to have a significant negative effect on health for part of the site as they contain areas that are located more than 30 minutes from a GP as well as being more than 60 minutes from a hospital. However, all of these sites also contain areas which are expected to have a positive effect on health in Kirklees as levels of access vary within those sites. None of the mixed use site options were found to have entirely significant negative effects on health as none were entirely located more than 30 minutes from a GP and more than 60 minutes from a hospital. The locations of those sites are shown in **Map MX6**. All are located relatively close to urban areas but they are generally quite large sites, which accounts for the relatively poor access to healthcare facilities from parts of the sites.
- 6.23 Development within or adjacent to either of the two Air Quality Management Areas that have been declared in Kirklees could negatively affect the health of residents as result of exposure to poor air quality. None of the mixed use site options are either within or are directly connected by road to an AQMA, and therefore no negative effects have been highlighted in relation to this issue.

SA objective 5: Protect local amenity including avoiding noise and light pollution

- 6.24 Where new development is proposed within close proximity of sensitive receptors (e.g. existing houses, schools, hospitals etc.) there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase. Mixed use development (incorporating residential development) within close proximity of major roads or railways or industrial areas may result in noise pollution affecting residents in the longer term.
- 6.25 Twenty (69%) of the 29 mixed use site options were identified as having a likely significant negative effect on this SA objective either because they would result in development which would be surrounded by existing residential development or other sensitive receptors, or because the residential development which would result would be directly adjacent to an 'A' road, motorway or railway line or an industrial area. The locations of those sites are shown in **Map MX7**, which also shows the locations of key transport routes. The sites that are likely to have a significant negative effect are mainly clustered around the most heavily urbanised areas of the District, including in Huddersfield, Batley, Cleckheaton and Dewsbury. Proximity to the M62 which mostly runs along the northern boundary of the District is also a key factor, with sites in that area of the District being particularly likely to be adversely affected in relation to amenity.
- 6.26 A further eight (28%) of the site options could have a minor negative effect, particularly over the short term during the construction phase, as they are not surrounded by existing residential development or other sensitive receptors but have such receptors within 100m.

- 6.27 One (3%) of the mixed use sites (MX1902) is located more than 100m from any sensitive receptors and is not located adjacent to an 'A' road, motorway or railway line or an industrial area. Therefore, this site is likely to have a negligible effect on local amenity in Kirklees.
- 6.28 No likely positive effects, either minor or significant, were identified in relation to this SA objective.

SA objective 6: Retain and enhance access to local services and facilities

- 6.29 Mixed use sites which would result in the provision of new services and facilities, are expected to have a positive effect on access to local services and facilities in Kirklees.
- 6.30 Where new services and facilities are not proposed as part of a mixed use development site option, and where the development will incorporate residential provision, the location of the site could affect this objective by influencing people's ability to access existing services and facilities.
- 6.31 Thirteen (45%) of the 29 mixed use site options were identified as having a likely significant positive effect on access to services in Kirklees. This is due to residential development being proposed within five minutes of a local centre and 15 minutes of a town/district centre or because the mixed use development proposed would include the provision of new services or facilities which could be used by the residents of Kirklees (this is the case for MX1903, MX1904, MX1906, MX1915, MX1920, MX1924, MX1930 and MX1931). Seven (24%) sites would have significant positive effects alone while six further sites (21%) are likely to have a significant positive effect as part of a mixed effect overall, because levels of access vary within those sites. The locations of the sites that are likely to have entirely or partly significant positive effects are shown in **Map**MX8 and it can be seen that they are mostly located close to the main urban centres in the north of Kirklees.
- 6.32 Minor positive effects have been identified for six (21%) of the mixed use site options in relation to access to local services and facilities. These sites are located within five minutes of a local centre or within 15 minutes of a town/district centre, but not both.
- 6.33 Ten (34%) of the mixed use site options are likely to have significant negative effects in relation to access to local services and facilities; however in all cases this was part of a mixed effect overall. This is because although parts of these sites are located more than 15 minutes from a local centre and more than 30 minutes of a town/district centre, levels of access from other parts of the sites are better. The locations of the sites that are likely to have partly significant negative effects on access to services are shown in **Map MX9**. All are located relatively close to urban areas but they are generally quite large sites, which accounts for the relatively poor access to services and facilities from parts of some sites.

SA objective 7: Make our communities safer by reducing crime, anti-social behaviour and the fear of crime

6.34 The effects of new mixed use developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development (rather they will be determined through the detailed proposals for each site) and so the effects of all of the mixed use site options on this SA objective are negligible.

SA objective 8: Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage

- 6.35 Where mixed use sites would result in the provision of new open space or sports/recreation facilities, a significant positive effect on this SA objective is likely. This is the case for one (4%) of the 29 mixed use site options (MX1903) which would incorporate new open space as part of the development.
- 6.36 Where new recreation facilities or open space would not be incorporated within the development of a mixed use site, and where the development would incorporate residential development, the

- proximity of the site to existing recreational facilities and areas of open space will influence effects, particularly if facilities and open space are within walking distance.
- 6.37 Five (17%) of the mixed use site options are within 600m of three or more areas of open space or playing fields/sports facilities, cycle paths, footpaths or bridleways and so are likely to have a significant positive effect for that reason.
- 6.38 A further 20 (69%) site options are within 600m of three or more areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways but so will have a significant positive effect; however they also include one of these features which may be lost or disrupted as a result of the development of the site. Therefore, the significant positive effect expected for these mixed use site options is part of a mixed effect overall, along with a potential significant negative effect. The negative effect is uncertain, however, as it is not yet known if the recreation asset will be lost as a result of development at each location.
- 6.39 Four (14%) further sites are within 600m of one or two areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways and so are likely to have a minor positive effect on encouraging their usage. In two cases this is part of a mixed effect overall as those sites also contain recreation assets that could be lost as a result of new development.
- 6.40 The locations of the sites that would have entirely or partly significant positive effects are shown in **Map MX10**.

SA objective 9: Ensure all people are able to live in a decent home which meets their needs

- 6.41 All of the potential mixed use sites that would incorporate residential development are expected to have positive effects on this objective, due to the nature of the development proposed, and it is assumed that developments will include an appropriate proportion of affordable housing. Larger sites will provide opportunities for developing greater numbers of new homes, and therefore are assumed to have a significant positive effect, although this is uncertain depending on how much of the mixed use development is residential as opposed to employment development. Based on the range of sizes of the potential sites for mixed use development being considered by Kirklees Council, larger sites are taken to be those over 5ha.
- 6.42 Fourteen (48%) of the 29 mixed use site options would incorporate residential development and are more than 5ha in size so are likely to have a significant positive effect on housing in Kirklees. The locations of those sites can be seen in **Map MX11**. There is no particular pattern in relation to the geographical location within the District of the sites that are likely to have a significant positive effect; rather this is determined purely on the basis of the site size.
- 6.43 A further 11 (38%) mixed use site options would incorporate residential development but are smaller than 5ha in size and so a minor rather than significant positive effect is identified. However, in all cases the potential positive effects are uncertain depending on how much of each site would eventually be used for housing development as part of the wider mixed uses proposed.
- 6.44 The remaining four (14%) mixed use site options would not provide housing as part of current proposals and a negligible effect is expected for these options.

SA objective 10: Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport

- 6.45 The likely effects of mixed use sites on this SA objective depend on two key factors: how accessible services and facilities are from the site via sustainable transport (where a site would incorporate residential development) and how many people would be able to access jobs at the site via sustainable transport (where a site would incorporate employment development).
- 6.46 The heat mapping work that has been carried out for Kirklees Council assessed the accessibility of eight different features from each mixed use (incorporating residential) site option on the basis of sustainable modes of transport, and maps the sites on a scale of green to red. Sites are mapped as green (and therefore considered as having good access) for the feature in question when they

- are within the journey time standards set out by the Department for Transport, which vary for each of the eight features.
- 6.47 Accessibility 'heatmapping' work has also been analysed by the Council to identify the number of working age people (those aged 16-64) that live within 20 minutes travel time of each mixed use site option which would incorporate employment development, taking into account non-car based modes of transport. Where more working age people are able to access the employment opportunities at mixed use sites via sustainable transport it is assumed to be more likely that people will use non-car based modes of transport to commute.
- 6.48 Twenty one (72%) of the 29 mixed use site options are likely to have either entirely or partly significant positive effects on this objective, either because they would incorporate residential development and were mapped as green for at least four of the eight features, or because they would incorporate employment development and would be accessible for more than 25,000 people within 20 minutes via sustainable transport. For some sites, both of these criteria are met. Map MX12 shows the locations of the sites that would have entirely or partly significant positive effects.
- 6.49 The remaining eight (28%) site options would have an entirely or partly minor positive effect because they either would incorporate residential development and were mapped as green for between one and three of the eight features assessed, or because they would incorporate employment development and would be accessible by public transport within 20 minutes for between 5,000 and 25,000 people. Again, for some sites both criteria apply.
- 6.50 Two of the mixed use site options (MX1905 and MXMX1923) could have a significant negative effect as part of a mixed effect overall, because they are both proposed for partly residential development but were not mapped as green for any of the eight features assessed in the heatmapping work. The locations of those sites are shown on **Map MX13**.

SA objective 11: Secure the efficient and prudent use of land

- 6.51 Where development takes place on greenfield land or areas of high quality agricultural land it is a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land. None of the mixed use site options are on Grade 1 agricultural land as there is none of this in Kirklees.
- 6.52 Two (7%) of the mixed use site options (MX1903 and MX1930) are relatively large (over 5ha) and are entirely or mainly on brownfield land, so are likely to have a significant positive effect on the efficient use of land in Kirklees. The locations of those sites are shown in **Map MX14**. A further nine (31%) mixed use site options have been identified as having a minor positive effect on efficient land use given that they are located on brownfield land but are relatively small (less than 5ha). The locations of those sites are also shown in **Map MX14**.
- 6.53 Twelve (41%) of the mixed use site options are likely to have a significant negative effect on efficient land use, because they are relatively large in size (over 5ha) and are entirely or mainly on greenfield land, so could have a significant negative effect. The locations of those sites are shown in **Map MX15** and can be seen to correlate broadly with the extensive areas of Grade 3 agricultural land which are mainly located in the north, central areas and east of Kirklees. A further six (21%) mixed use site options are small in size but on greenfield land therefore are likely to have a minor negative effect. The locations of those sites are also shown in **Map MX15**.

SA objective 12: Protect and enhance the character of Kirklees and the quality of the landscape and townscape

- 6.54 A small area in the south of Kirklees lies within the Peak District National Park. Development within that part of the District could have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known. One of the mixed use site options (MX1919) is located within 500m of the National Park and so could have a significant negative effect on the landscape for that reason.
- 6.55 Outside of designated landscapes, where development would take place on greenfield land the character of the local environment is more likely to be affected and larger sites are more likely to

have a more prominent impact than smaller sites. However, effects are uncertain depending on the design of new development and the quality of the landscape. Where a brownfield site is redeveloped it is likely that the overall character and appearance of the site will be improved as a result of new development, which is assumed to be of high quality, and this may benefit the appearance of the landscape/townscape. However, this is uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously. Information from the emerging Kirklees Landscape Character Assessment has also been taken into account in the SA.

- 6.56 Twelve (41%) of the 29 mixed use site options are large sites (over 5ha) and are entirely or mainly on greenfield land so may have a significant negative effect on the landscape for that reason (all 12 are more than 500m from the National Park). A further six (21%) sites may have a minor negative effect as they are small in size but are entirely or mainly on greenfield land. The remaining 10 (34%) sites are on brownfield land so could have a minor positive effect. No likely significant positive effects were identified in relation to any of the mixed use site options.
- The locations of the mixed use site options that could have a significant negative effect on the landscape because of their size are shown in **Map MX16**.

SA objective 13: Conserve and enhance the historic environment, heritage assets and their settings

- 6.58 Judgements about the likely effects of the mixed use site options on the historic environment are based on information provided by Historic England (formerly English Heritage). Each site has been rated by Historic England as either red, orange, yellow or green based on the likely effects on the historic environment of developing the site in question and those judgements converted to SA scores.
- None of the mixed use site options were rated by Historic England as 'red', meaning that the development of the site would be likely to result in substantial harm to a designated heritage asset. Therefore, no likely significant negative effects were identified for any of the site options. However, potential minor negative effects were identified for four (14%) of the mixed use site options as they were classed as 'yellow' by Historic England, meaning that the allocation of these sites could impact on designated heritage assets but their development is unlikely to result in harm to those assets if the development accords with the anticipated Local Plan policies for managing change to the historic environment. The locations of those sites (MX1903, MX1906, MX1923 and MX2101) are shown in **Map MX17**.
- 6.60 In all cases, potential negative effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).
- 6.61 A further six (21%) employment site options were identified as 'orange' by Historic England as their likely effects on the historic environment are uncertain.
- 6.62 The final 19 (66%) employment site options were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those sites are therefore most likely to have a negligible effect on this SA objective although this is again uncertain.
- 6.63 No likely positive effects (minor or significant) were identified in relation to any of the mixed use site options.

SA objective 14: Maximise opportunities to protect and enhance biodiversity and geodiversity

6.64 Mixed use sites that are within close proximity of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, trampling etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication

- of the potential for an adverse effect, uncertainty exists as the distance at which effects might occur is not the same for all types of habitats and species, and appropriate mitigation may avoid adverse effects and may even result in beneficial effects.
- 6.65 In addition to potential effects on nearby designated sites, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment (as site surveys are not undertaken). This would need to be determined once more specific proposals are developed and submitted as part of a planning application. Distances of 250m and 1km have been used as an indication of proximity, as there are no standard distance thresholds available and it is recognised that the distance over which effects may occur vary between habitats and species and the types of effect being considered. This level of detail is not possible to be determined as part of the SA, but the findings of the Habitats Regulations Assessment (HRA) will be taken into account during the next stage of the Local Plan preparation.
- 6.66 Thirteen (45%) of the mixed use site options were identified as having a potentially significant negative effect on this SA objective as they are within 250m of one or more designated biodiversity or geodiversity sites. One of these sites, MX1908, could also have a minor positive effect on protecting and enhancing biodiversity and geodiversity in Kirklees given that it is proposed to include a country park. The locations of all 13 site options that could have significant negative effects on this SA objective are shown in **Map MX18**.
- 6.67 A further 11 of the mixed use site options could have a minor negative effect on this objective as they are between 250m and 1km from a designated biodiversity or geodiversity site. The remaining five (17%) mixed use site options are most likely to have a negligible effect given that they are located more than 1km from any designated biodiversity or geodiversity sites. This effect is again uncertain until the design and layout of the sites are known, as there may be opportunities to incorporate biodiversity enhancements.

SA objective 15: Reduce air, water and soil pollution

- 6.68 The location of mixed use developments within Kirklees would not have a direct effect on levels of soil or water pollution, which would be influenced by factors such as whether there is capacity at the District's sewage treatment works to treat the additional wastewater generated by the overall scale of development proposed (this will be considered separately in relation to the Local Plan policies addressing the quantum of development that will be provided in Kirklees). Potential impacts on soil are under SA objective 11 above, which considered potential impacts of mixed use site options on best and most versatile agricultural land.
- 6.69 Development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic from population growth in those areas could compound existing air quality problems. Those AQMAs are located in the north of the District one covers two sections of the Leeds Road A62 (in the vicinity of the junctions with the A6107 Bradley Road, and with the A644) and the other is along part of the Huddersfield Road A644.
- 6.70 However, none of the mixed use site options assessed are located within or in close proximity to an AQMA and therefore all sites were identified as having a negligible effect on the objective of reducing pollution in Kirklees. However, it is still important to ensure that new development does not contribute to increased air pollution in and around Kirklees, therefore all mixed use development should incorporate sustainable transport links where possible to reduce car use.
 - SA objective 16: Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people
- 6.71 New development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where sites are within high risk flood zones. While new development in any location may offer good opportunities to incorporate SuDS, and therefore have a positive effect on reducing flood risk, this would depend on the design of the proposed development and not on the location of the site.

- 6.72 The main land uses likely to be incorporated into the mixed use site options are residential and employment development. National Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of flood zone 1 and 2 but would require an exception test in flood zone 3a, and is unsuitable in flood zone 3b. Offices and general industry are identified as a 'less vulnerable use', which is suitable in areas of flood zone 1, 2 and 3a but is unsuitable in flood zone 3b.
- 6.73 Four (14%) of the mixed use site options are likely to have a significant negative effect on this SA objective as they are entirely or mainly on greenfield land that is within flood zone 3a or flood zone 3b. The locations of those sites are shown in **Map MX19**.
- 6.74 If any of those four sites are taken forward for development it is therefore essential that appropriate mitigation is incorporated; this may involve only developing the part of a site which is outside of flood zone 3a or 3b and instead using that land for open space. The sequential test would also need to have demonstrated that there are no suitable sites in lower areas of flood risk that could be allocated instead.
- 6.75 A further 16 (55%) of the mixed use site options are likely to have a minor negative effect as they are either entirely or mainly on greenfield outside of flood zone 3b, or are entirely or mainly on brownfield within flood zone 3b.
- 6.76 The remaining nine (31%) sites are on brownfield land outside of flood zone 3b so are likely to have a negligible effect. However, mitigation measures such as SuDS should be designed into all new developments to reduce the impermeable surfaces created in the District and reduce the risk of surface water flooding, and not just reserved for those development sites in the high flood risk zones.

SA objective 17: Increase prevention, re-use, recovery and recycling of waste close to source

- 6.77 All new mixed use development is likely to involve an increase in waste generation, but may also offer good opportunities for incorporating sustainable waste management practices (e.g. through sustainable construction practices but also design of new developments to incorporate space for storage and collection of recyclables), regardless of the location of the potential development sites. Kirklees has District-wide kerbside recycling; therefore proximity to household recycling centres is not a key indicator of the effects of development on recycling rates.
- 6.78 Eighteen (62%) of the 29 mixed use site options are on greenfield land and so are likely to have a minor negative effect on the objective of reducing waste in Kirklees. The locations of those sites are shown in **Map MX20**.
- 6.79 The remaining 11 (38%) mixed use site options are on brownfield land so may have a minor positive effect on this objective although this is uncertain depending on the previous use of the site.
- 6.80 No likely significant effects, either positive or negative, were identified for any of the mixed use site options.

SA objective 18: Increase efficiency in water energy and raw material use

- 6.81 While all new mixed use development is likely to involve an increase in energy and water consumption this will not be influenced by the location of sites. In addition, new development may offer good opportunities for incorporating renewable energy generation and water efficiency measures and it is assumed that new development will be built to high standards of efficiency.
- 6.82 Similarly, all development will result in the increased consumption of minerals for construction but this will not be influenced by the location of mixed use sites. The location of development sites can influence the efficient use of minerals by the proximity of the development to Minerals Safeguarding Areas as development in those areas may sterilise mineral resources and restrict the availability of resources in the District. However, because of the extent of minerals resources within Kirklees, all sites would have the same effect. In addition, not all of the resources would

necessarily be economically viable and it may be possible to achieve prior extraction to avoid sterilisation. Therefore, all sites are likely to have a negligible effect on this SA objective.

SA objective 19: Reduce the contribution that the District makes to climate change

- 6.83 The location of mixed use development will not affect the contribution that the buildings make to climate change, which will be influenced by other factors such as how energy efficient the building is and the nature of any commercial activities at the sites. Therefore, as for SA objective 10 above, the scores for this objective are based on the Council's analysis of the heat mapping work that has been carried out for Kirklees Council and takes into account how many working age people would be able to access the site within 20 minutes via sustainable modes of transport (where a site would incorporate employment development) and how many of the eight features assessed are accessible from sites proposed for partly residential use.
- 6.84 The likely effects on this objective are therefore as described above under SA objective 10 and the same likely significant positive effects are identified for the sites shown in **Maps MX12** and **MX13**.

Summary of SA findings for the mixed use site options

- 6.85 **Table 6.1** overleaf shows the SA scores for all of the 29 mixed use site options.
- Out of the 29 mixed use site options, 24 (83%) have been found to have a likely significant effect on at least one of the SA objectives (not taking into account mixed effects that include a partial significant negative effect). Of these, eight site options (28% of the total) are likely to have a significant negative effect on only one SA objective (generally SA objective 5: local amenity), and only seven (24%) of the 29 sites would have a significant negative effect on four or more SA objectives. These are:
 - MX1904, MX1911, MX1923, MX1925, MX1926 and MX1929 could have four significant negative effects.
 - MX1918 could have five potentially significant negative effects.
- 6.87 The purpose of the SA is not to identify sites that should or should not be allocated for development, as the SA is one of a number of tools to inform the Council's decision making. However, it is clear from the findings of the SA that there are mixed use site options that would be more likely to have a number of negative sustainability effects than others (such as the seven sites listed above) and it may therefore be that those sites are less appropriate for residential development. In addition, it is recommended that the four sites in flood zone 2 and 3 (MX1912, MX1913, MX1915 and MX1918) are not allocated as Mixed Use sites in the Local Plan, unless the sequential test can be met. If these four sites are taken forward for development it is essential that appropriate mitigation is incorporated this may involve only developing any part of a site which is outside of flood zones 3 and 2 and instead using that land for open space.
- 6.88 It is recognised however, that there is potential to mitigate many of the potential negative effects identified (in particular through development of appropriate policy safeguards within the Local Plan), and several of the effects are uncertain depending on the eventual development proposals that come forward for a site, as described earlier in this section.

Table 6.1: SA Scores for all of the 29 Mixed Use site options

Table 6.1	. 57	30	0163 10	i ali oi		C 27 IV	IIAC			jectiv									
Site	: Employment	: Economy	3: Education	4: Health	: Amenity	6: Services and Facilities	7: Crime	Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
option	<u></u>	2:			5:			 &											
MX1902	+	+	0	0	0	0	0	+/?	0	0/++	-	-?	0?	-?	0		-	0	0/+
MX1903		+	++?	+?	드	++/0	0	++	++?	++	++	+?	-?	-?	0	0	+?	0	++
MX1904	+	+	++?/?	++/		++/	0	++/?	++?	++	_	?	?	?	0	-	-	0	++
MX1905	+	+	++?/ ?	+/	-	0/	0	++/ 2	++?	/+		?	0?	?	0	-	-	0	/+
MX1906	+		0	0			0	+/?	0			. 2	-?	-?	0	0	+?	0	
MX1907	0	0		0	-	++	0		0 +?	++	+	+?						0	++
IVIX 1 907	U	U	++?	+	Н	++	0	++	+ !	++	+	+?	0?	0?	0	0	+?	U	++
MX1908	0	0	+?	+		+	0	++/ ? ++/	+?	++	-	-?	0?	?/+	0	-	-	0	++
MX1909	+	+	++?	-		+	0	?	+?	++	+	+?	0?	?	0	0	+?	0	++
MX1911	+	+	++?/- ?	++/-		+/	0	++/ ?	++?	+		?	?	?	0	-	-	0	+
MX1912	+	+	++?	-	-	0	0	++/	++?	+		?	0?	-?	0		-	0	+
MX1913	+	+	+?	+	-	+	0	++/	+?	++	-	-?	0?	?	0		-	0	++
MX1914	+	+	++?/ ?	+/		+/	0	++/ ?	++?	+		?	0?	-?	0	-	-	0	+
MX1915	0	0	++?	+		++	0	++	+?	++	-	-?	0?	-?	0			0	++
MX1918	+	+	+?	+/0		0	0	++/ ?	++?	++		?	0?	?	0		-	0	++
MX1919	+	+	+?	+		+	0	++/ ?	+?	++	+	?	0?	-?	0	-	+?	0	++
MX1920		+	+?	+	-	++	0	++	+?	++	+	+?	?	?	0	-	+?	0	++
MX1921	+	+	++?/0 ?	0		0	0	++/?	+?	+	-	-?	?	0?	0	-	-	0	+
MX1922	+	+	0	0	-	0	0	+	0	++	+	+?	0?	0?	0	0	+?	0	++
MX1923	+	+	+?/?	+/		++/	0	++/	++?	/+		?	-?	?	0	-	-	0	/+
MX1924	0	0	++?	++		++	0	++/?	+?	++	-	-?	0?	-?	0	-	-	0	++
MX1925	+ +	+	++?/ ?	+/		0/	0	++/ ? ++/	++?	+		?	0?	?	0	-	-	0	+
MX1926	+	+	+?/-?	++/-		+/	0	?	++?	+		?	?	?	0	-	-	0	+
MX1927	+	+	++?/?	+/		++/	0	++/?	++?	++	-	?	0?	-?	0	-	-	0	++
MX1928	+	+	++?/- ? ++?/	++/0		++/	0	++/?	++?	++		?	0?	-?	0	-	-	0	++
MX1929	+ +	+	?	+/		++/	0	++/?	++?	++		?	0?	?	0	-	-	0	++
MX1930	+	+	++?	+	-	++	0	++	++?	++	++	+?	?	-?	0	0	+?	0	++
MX1931	+	+	0	0		++	0	+	0	++	+	+?	0?	0?	0	0	+?	0	++
MX2101	+	+	++?	++		+	0	++/?	+?	++	+	+?	-?	?	0	0	+?	0	++
MX2155	+	+	++?	+		+	0	++/	+?	++/	+	+?	0?	0?	0	0	+?	0	++/

7 SA findings for the Open Space Site Options

- 7.1 This section presents the SA findings for the open space site options that were considered by Kirklees Council for allocation in the emerging Local Plan.
- 7.2 A total of 551 reasonable alternative open space site options have been identified and subject to SA by Kirklees Council. These comprise options for urban green space and local green space. The SA work for the open space sites was carried out on the basis of the methodology set out by LUC but this part of the appraisal work was undertaken by Council officers. A set of SA assumptions was devised by LUC to ensure that this large number of reasonable site options could be appraised consistently these assumptions are presented in **Appendix 4** (see Table A4.4).
- 7.3 The likely effects of the open space site options are summarised below in relation to each SA objective. Particular consideration has been given to the likely significant effects identified (both positive and negative), in line with the requirements of the SEA Regulations. Where relevant, effects are classified as short, medium or long-term.
- 7.4 The SA scores for all of the reasonable open space site options are presented in **Table 7.1** at the end of the chapter, and the detailed SA matrices for the open space site options are available in the separate **Annex 4**.
- 7.5 **Annex 4** also includes the maps that are referred to throughout this section. Those maps show the locations of the site options that are likely to have significant effects (both positive and negative where relevant) on the various SA objectives.
- 7.6 Due to the large number of site options considered, it is not possible to describe all of the individual sites that are likely to have positive or negative effects on particular SA objectives. Therefore, the summary focuses on the key messages coming out of the SA and identifies the key issues of relevance to the Council's decision making regarding which sites to allocate for open space in the Local Plan (as described in **Chapter 2**, this summary was provided to the Council before the Draft Local Plan was finalised, in order that the findings could be used to inform decision making). Along with the SA findings, other factors were also taken into account by the Council including the deliverability of the sites. Information about the reasons for selecting or rejecting each open space site option is provided in **Appendix 5**.

Summary of effects by SA objective

- 7.7 As explained in the SA assumptions in **Appendix 4**, the allocation of areas of open space within the Kirklees Local Plan is unlikely to have an effect on most of the SA objectives. Only six of the 19 SA objectives could be affected, and as summarised below and in **Table 7.1** at the end of this section, the effects of allocating areas of open space are mostly positive, with no negative effects identified.
 - SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible
- 7.8 The location of areas of open space would not affect the number of jobs and range of employment opportunities in Kirklees or make them more accessible; therefore the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 2: Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship

7.9 The location of areas of open space would not have an effect on encouraging the development of the economy in Kirklees; therefore the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 3: Ensure education facilities are available to all

7.10 The location of areas of open space would not affect the number of education facilities in Kirklees or people's ability to access them; therefore the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 4: Improve the health of local people and ensure that they can access the health and social care they need

7.11 Open space sites can have benefits for health as they may enable more people to participate in active outdoor recreation. However, the proximity of open space sites to residential areas and therefore how easily accessible they are for the residents of Kirklees is assessed under SA objective 8. Therefore, the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 5: Protect local amenity including avoiding noise and light pollution

7.12 The location of areas of open space would not affect local amenity including levels of noise and light pollution in Kirklees; therefore the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 6: Retain and enhance access to local services and facilities

7.13 The location of areas of open space would not affect levels of access to services and facilities in Kirklees; therefore the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 7: Make our communities safer by reducing crime, anti-social behaviour and the fear of crime

7.14 The effects of new open space sites on levels of crime and fear of crime will depend on factors such as the design and the use of appropriate lighting, which could have an effect on perceptions of personal safety, particularly at night when open spaces are likely to be less well-used. However, such issues will not be influenced by the location of the open sites (rather they will be determined through the detailed proposals for each site at planning application stage and/or through ongoing management/maintenance of sites) and so the effects of all of the 551 open space site options on this SA objective were recorded as negligible.

SA objective 8: Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage

- 7.15 Open space sites that are within walking distance (600m) of residential and employment development will ensure that people have good access to areas that can be used for recreation.
- 7.16 All of the 551 open space site options are within 600m of existing residential or employment development and so will have a minor positive effect on this SA objective. The proximity of open space site options to the locations of potential employment and residential site options being considered for allocation in the Local Plan were not taken into account during the appraisal of open space site options at this stage, as there is currently no certainty about whether or not those employment or residential sites will eventually be allocated. The relative proximity of the

preferred sites for employment and residential development and open space sites will be assessed during later stages of the SA once preferred sites have been identified by the Council.

SA objective 9: Ensure all people are able to live in a decent home which meets their needs

7.17 The location of areas of open space would not affect the amount of housing and affordable housing in Kirklees; therefore the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 10: Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport

7.18 The location of areas of open space would not affect the provision of sustainable transport or transport infrastructure in general in Kirklees; therefore the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 11: Secure the efficient and prudent use of land

- 7.19 Where open space areas are located on high quality (Grade 1, 2 or 3) agricultural land, a positive effect has been identified on this SA objective given that built development which may result in a loss of high quality agricultural land will be prevented from occurring at these locations. While the allocation of sites for open space would still prevent the land being used for agricultural purposes, the land would be retained for the longer-term instead of being lost under built development.
- 7.20 None of the 551 open space site options are located on Grade 1 or Grade 2 agricultural land and therefore no significant positive effects were identified in relation to this SA objective. Forty six sites (8%) were identified as being located on Grade 3 agricultural land and therefore are likely to have a minor positive effect in relation to avoiding the potential loss of that land to other development. The remaining 505 sites (92%) are located on land that is either Grade 4 or below, or urban land. As locating open space sites in those areas would not prevent the use of higher quality agricultural land, a negligible effect was recorded for this SA objective for those sites.
- 7.21 The locations of the 46 sites that are likely to have minor positive effects are shown in **Map OS1** and can be seen to correlate broadly with the extensive areas of Grade 3 agricultural land which are mainly located in the north, central areas and east of the District. Therefore, if open space sites are allocated in those areas, this will help to avoid the loss of high quality agricultural land.

SA objective 12: Protect and enhance the character of Kirklees and the quality of the landscape and townscape

- 7.22 Areas of open space in Kirklees are expected to help to enhance the character of the District regardless of their location; therefore all of the 551 site options are likely to have a positive effect on this SA objective. The positive effect of these sites is dependent upon the each site's size, with large sites (classified as those over 3ha) expected to have a significant positive effect on the character and appearance of the surrounding area.
- 7.23 Of the 551 open space site options, 142 (26%) have been identified as being over 3ha in size and therefore are expected to have a significant positive effect on this SA objective. The remaining 409 sites (74%) are expected to have a minor positive effect on this SA objective.
- 7.24 The locations of the sites that are likely to have significant positive effects are shown in **Map OS2**. While there is no direct correlation between the size of sites and their geographical distribution within the Borough, it can be seen that there is a high concentration of relatively large open space options in the north and centre of the District.

SA objective 13: Conserve and enhance the historic environment, heritage assets and their settings

- 7.25 Open space sites which are located in close proximity of designated historic assets are expected to have a positive effect on the setting of these assets as they would prevent further development (which may not be of a sympathetic nature with regards the existing character of the area) from occurring. However, detailed impacts on the setting of individual historic assets cannot be determined with certainty at this strategic level of assessment.
- 7.26 Open space sites that include one or more designated heritage assets within their boundaries are expected to have a significant positive effect on this SA objective. This was the case for 157 of the 551 site options (28%), where the allocation of open space may prevent development from occurring within the immediate setting of the heritage assets in question.
- 7.27 The locations of the sites that are likely to have significant positive effects are shown in **Map OS3**. Most are located in the more urban areas of the northern part of Kirklees, in and around Huddersfield, Batley and Cleckheaton, where there is a denser concentration of heritage assets such as listed buildings in comparison to the rural areas.
- 7.28 Of the remaining sites, 307 (56%) are expected to have a minor positive effect on this SA objective as they are located within 250m of a designated historic asset (but the asset is outside of the site itself) and therefore could protect the wider setting of these identified assets by preventing development at these locations. A further 87 (16%) of the open space site options are located more than 250m from any designated historic assets and therefore are not expected to have a direct effect on these assets or their settings. As such a negligible effect was recorded for those 87 sites.

SA objective 14: Maximise opportunities to protect and enhance biodiversity and geodiversity

- 7.29 All open space sites are expected to have a positive effect on this SA objective given that they would secure additional areas of habitat and promote habitat connectivity. Larger sites (those over 3ha) may have particularly positive effects on this objective.
- 7.30 Of the 551 open space sites assessed, 142 (26%) were over 3ha and therefore are expected to have a significant positive effect on this SA objective given that they would provide a larger area of habitat. The remaining 409 sites (74%) were under 3ha in size and therefore are expected to have a minor positive effect on this SA objective.
- 7.31 The locations of the sites that are likely to have significant positive effects are shown in **Map OS4**. While there is no direct correlation between the size of sites and their geographical distribution within the Borough, it can be seen that there is a high concentration of relatively large open space options in the north and centre of the District.

SA objective 15: Reduce air, water and soil pollution

7.32 The location of open space in Kirklees is not expected to have a direct effect on air, water or soil pollution; therefore all sites are recorded as having a negligible effect on this SA objective. No significant positive or negative effects are therefore expected in relation to pollution for any of the 551 open space sites assessed.

SA objective 16: Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people

- 7.33 Where open space is allocated it could have a positive effect on flood risk by ensuring that there are areas of permeable surfaces which should increase infiltration and reduce the risk of surface water flooding. This will be particularly beneficial where sites are large and are within areas of higher flood risk.
- 7.34 Larger sites (those over 3ha) which are located within areas of high flood risk (flood zones 2, 3a and 3b) would have a significant positive effect on this SA objective. Of the 551 site options, 32

- (6%) were identified as likely to have a significant positive effect for this reason. Of the remaining sites, 169 (31%) are located within areas of high flood risk but are smaller than 3ha and therefore minor positive effects on this SA objective are expected. The remaining 350 open space sites (64%) are not located within an area which is at high risk of flooding and therefore are not expected to have a direct effect on the objective of reducing flood risk in Kirklees.
- 7.35 The locations of the sites that are likely to have significant positive effects are shown in **Map**OS5, which also shows the location of flood zones 2 and 3 in Kirklees. It can be seen that the
 parts of the District that are at the highest risk from fluvial flooding are in the north and centre of
 Kirklees, around the rivers Colne (north-east of Huddersfield) and Calder (east of Mirfield and
 south of Dewsbury). Across the District there are other smaller areas of flood zones 2 and 3,
 particularly around Fenay Beck (east of Almondbury), river Holme (south of Huddersfield), river
 Colne (south-west of Huddersfield) and the river Spen around Heckmondwike. If any of the 37
 sites with potential significant positive effects are taken forward for allocation, they should help to
 provide mitigation for the potential effects of new development in those areas.

SA objective 17: Increase prevention, re-use, recovery and recycling of waste close to source

7.36 The location of open space in Kirklees is not expected to have an effect on increasing the prevention, re-use, recovery and recycling of waste; therefore all sites are recorded as having a negligible effect on this SA objective. No likely significant positive or negative effects are identified for any of the 551 open space sites assessed.

SA objective 18: Increase efficiency in water, energy and raw material use

7.37 The location of areas of open space would not affect the use of water, energy or raw materials in Kirklees; therefore the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 19: Reduce the contribution that the District makes to climate change

7.38 The location of areas of open space in Kirklees would not affect the Borough's overall contribution to climate change; therefore the effects of all of the 551 open space site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

Summary of SA findings for the Open Space site options

7.39 **Table 7.1** overleaf shows the SA scores for all of the 551 open space site options. There is not a lot to distinguish between the 551 open space site options in sustainability terms. Allocating any open space sites within the Kirklees Local Plan will have positive effects on access to recreation, contributing to landscape character and biodiversity networks. Most of the open space options could also help to protect or enhance the setting of heritage assets in the District as well, and the open space sites within the highest flood risk zones could help to reduce the risks of flooding in the District.

Table 7.1:	SA Sco	ores fo	r all of	the 55	51 Ope	n Spac	e site	optio											
									SA ob		es								
Site	: Employment	: Economy	: Education	: Health	: Amenity	: Services and Facilities	: Crime	: Recreation	: Housing	0: Sustainable Transport	11: Efficient land use	12: Landscape	3: Historic Environment	14: Biodiversity and geodiversity	5: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
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UGS847 UGS848	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
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UGS850	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS851	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS853	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS854	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS855	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS856	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS857	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS858	0	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0	0	0	0
UGS860	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS861	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS862	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS864	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS865	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS866 UGS867	0	0	0	0	0	0	0	+	0	0	0	+	0 +?	+	0	0	0	0	0
UGS869	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS870	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS871	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS872	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS873	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS874	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
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UGS876	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS877	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
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UGS879	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
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UGS882	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	0	0	0	0
UGS883	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS884	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS885	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS886	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS887	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS888	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS889	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS890	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS891	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
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UGS898	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
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UGS938 0 <td>UGS936</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>0</td> <td>0</td> <td>+</td> <td>+</td> <td>+?</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td>	UGS936	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
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UGS940 0 <td></td> <td>_</td> <td></td> <td></td>																		_		
UGS941 0 <td></td> <td>_</td> <td></td> <td></td>																		_		
UGS942 0 0 0 0 0 0 0 + <td></td> <td>_</td> <td></td> <td></td>																		_		
UGS943 0 <td></td> <td>_</td> <td></td> <td>_</td> <td></td> <td></td> <td>_</td> <td></td> <td></td>													_		_			_		
UGS944 0 <td></td> <td>_</td> <td></td> <td></td> <td></td> <td>_</td> <td></td> <td></td>														_				_		
UGS946 0 <td></td>																				
UGS947 0 <td></td> <td>_</td> <td></td> <td></td> <td></td> <td>_</td> <td></td> <td>_</td> <td></td> <td></td>		_				_												_		
UGS949 0 <td>UGS947</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>++?</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td>	UGS947	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS951 0 <td>UGS948</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>+?</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td>	UGS948	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS952 0 <td></td> <td>0</td> <td>0</td> <td></td> <td></td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>0</td> <td>+</td> <td>0</td> <td></td> <td>0</td> <td>0</td> <td></td>		0	0			0	0	0	+	0	0	0	+	0	+	0		0	0	
UGS953 0 <td></td> <td>_</td> <td></td> <td></td>																		_		
UGS954 0 <td></td>																				
UGS955 0 <td></td> <td>_</td> <td></td> <td></td>																		_		
UGS956 0 <td></td> <td>_</td> <td></td> <td></td>																		_		
UGS957 0 <td></td> <td>_</td> <td></td> <td></td>																		_		
UGS958 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0																		_		
UGS959 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0																		_		
UGS960 0 0 0 0 0 0 0 0 0 0 0 + 0 0 + + + + +																		_		
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UGS962 0 0 0 0 0 0 0 0 0 + 0 0 0 + 0 0 0 + 0 0 0 0		0	0		0	0	0			0	0					0	+	0	0	0
UGS963 0 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + 0 0 0 0 0	UGS963	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0

									SA ob	iectiv	es								
						Se							t t						
						and Facilities				Transport	e e		Historic Environment	_					
						Fac				Tra	d use		iron	and				o	Climate change
	'n					pu		_ ا		ple	lan) e	-inv	sity				nse	cha
	ξ	کِ	tion	_	₹			atio	б	ina	ent	scap	i i	vers	tion	ling	Φ	ent	ate
	Employment	Economy	Education	Health	Amenity	Services	Crime	Recreation	Housing	Sustainable	Efficient land	Landscape	isto	Biodiversity diversity	Pollution	Flooding	/ast	Efficient use erials	li m
Site						Sel						2: L¢	3: H		5: Pc		17: Waste	18: Efficie materials	
option	-:-	2.:	 	4		.;	7:	<u></u>	9	10:	11:	12		14: geo		16:	_		19:
UGS964	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS965 UGS966	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0 +	0	0	0
UGS967	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	0	0	0	0
UGS968	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS969	0	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0	0	0	0
UGS970	0	0	0	0	0	0	0	+	0	0	+	++	+?	++	0	+	0	0	0
UGS971	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS972	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS973	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS974	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS975	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS977	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS978	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS979	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS980 UGS981	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS981	0	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0	0	0	0
UGS983	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS984	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS985	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS986	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS987	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS988	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS990	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS991	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS992	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS993	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS994 UGS995	0	0	0	0	0	0	0	+	0	0	0	+	0 +?	+	0	0	0	0	0
UGS996	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS997	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS998	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS999	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1000	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1001	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1002	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1003	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1004	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1005 UGS1006	0	0	0	0	0	0	0	+	0	0	0	++	0 +?	++	0	+	0	0	0
UGS1006	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	0	0	0	0
UGS1007	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1009	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1010	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1011	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1012	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1013	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1014	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1015	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1016	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1017	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1018 UGS1019	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1019	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
0031020	U	U	U	U	U	U	U		U	U	U		U	_	U	U	U	U	U

									SA ob	jectiv	es								
	Employment	Economy	Education	Health	Amenity	Services and Facilities	Crime	Recreation	Housing	Sustainable Transport	Efficient land use	Landscape	Historic Environment	14: Biodiversity and geodiversity	Pollution	Flooding	17: Waste	18: Efficient use of materials	Climate change
Site	1: Er	2: E(3. E	 H	5: Aı	6: S	7: CI	 8.	9: H	10:	1	12: 1	13: 1	4: I	5.	16: 1	7: 7	8: I	19: (
option UGS1021	0	0	0	4	0	0	0	+	0	0	+	++	0	++	0	+	0	0	0
UGS1022	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1023	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1024	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1025	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1026	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1027	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1028	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1029	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1030 UGS1031	0	0	0	0	0	0	0	+	0	0	0	+	+? +?	+	0	+	0	0	0
UGS1031	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	++	0	0	0
UGS1032	0	0	0	0	0	0	0	+	0	0	+	++	+?	++	0	+	0	0	0
UGS1034	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1035	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1036	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1037	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1038	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1039	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1040	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1041	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1042 UGS1043	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1043	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1045	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1046	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1047	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1048	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1049	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1050	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1051	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1052	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1053 UGS1054	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	0	0	0	0
UGS1054	0	0	0	0	0	0	0	+	0	0	0	++	+?	+ +	0	+	0	0	0
UGS1056	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1057	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1058	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1059	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1060	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1061	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1062	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1063	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1064 UGS1065	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	0	0	0	0
UGS1065 UGS1066	0	0	0	0	0	0	0	+	0	0	0	++	0 ++?	+ +	0	+	0	0	0
UGS1066	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1067	0	0	0	0	0	0	0	+	0	0	+	++	++?	++	0	++	0	0	0
UGS1069	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1070	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1071	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1072	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1073	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1074	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1075	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0

									SA ob	iectiv	es								
						Se							Ħ						
						and Facilities				Transport	nse		Historic Environment	70					
						Fас				Tra			iror	and				o of	Climate change
	ent		_			and		ے		Sustainable	Efficient land	be	Env	Biodiversity diversity	_	_		nse	cha
	Employment	ñ Ż	Education	_	Ϊξ			Recreation	ng	ain	ent	Landscape	oric	iver	Pollution	Flooding	<u>e</u>	ent	ate
	nplc	Economy	Inca	Health	Amenity	Services	Crime	cre	Housing	sust	l lici	and	Histo	siod iver	nllo	000	Vast	ffici	Ë
Site				≚						10: §	11: E	2: L	3: -	14: Biodiver geodiversity	5: P	6: F	17: Waste	18: Efficient use materials	19: C
option UGS1076	0	0	0 ښ	0 	0	9	0 7:	 	9.	0	0	_	+?	+	0	0	0	0	0
UGS1070	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1077	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS1079	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1080	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1081	0	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0	0	0	0
UGS1082	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1083	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1084	0	0	0	0	0	0	0	+	0	0	+	++	+?	++	0	+	0	0	0
UGS1085	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1086 UGS1087	0	0	0	0	0	0	0	+	0	0	0	++	0 +?	++	0	0	0	0	0
UGS1087	0	0	0	0	0	0	0	+	0	0	+	++	+?	++	0	++	0	0	0
UGS1089	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1090	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1091	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1092	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1093	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1094	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1095	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1096	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1097 UGS1098	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	0	0	0	0
UGS1098	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1100	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	+	0	0	0
UGS1101	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1102	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1103	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1104	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1105	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1106	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1107	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1108 UGS1109	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1109	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	0	0	0	0
UGS1111	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1112	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1113	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1114	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1115	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1116	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1117	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1118	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1119 UGS1120	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1120 UGS1121	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1121	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1123	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1124	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1125	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1126	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1127	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1128	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1129	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1130	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0

									SA ob	jectiv	es								
	Employment	Economy	Education	lth	Amenity	Services and Facilities	ne	Recreation	Housing	Sustainable Transport	Efficient land use	Landscape	13: Historic Environment	14: Biodiversity and geodiversity	Pollution	Flooding	17: Waste	18: Efficient use of materials	Climate change
Site	Emp	Ecol	Edu	Health	Ame	Ser	Crime	Rec	Hou				Ξ̈́	: Bic			×	18: Efficie materials	
option		2:	 	4	.: .:	:9	7:	.: ::	9.	10:	17	12:		14: geo	15:	16:			19:
UGS1131	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1132 UGS1133	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1133	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1135	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1136	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1137	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1138	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1139 UGS1140	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	0	0	0	0
UGS1141	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1142	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1143	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1144	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1145 UGS1146	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0 +	0	0	0
UGS1146	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1148	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1149	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1150	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1151	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1152 UGS1153	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1153	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1155	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1156	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1157	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1158	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1159	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1160 UGS1161	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1161	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1163	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1164	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1165	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1166 UGS1167	0	0	0	0	0	0	0	+	0	0	0	+	+? +?	+	0	0	0	0	0
UGS1167	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1169	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1170	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1171	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1172	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1173 UGS1174	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1174	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1176	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1177	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1178	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1179	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1180 UGS1181	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1181	0	0	0	0	0	0	0	+	0	0	0	++	+?	+ +	0	+	0	0	0
UGS1183	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1184	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1185	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0

Site	18: Efficient use of materials19: Climate change
Site O	
Site O	
Site option III III <th< td=""><td></td></th<>	
Site option III III <th< td=""><td></td></th<>	
Site option III III <th< td=""><td></td></th<>	
Site option III III <th< td=""><td></td></th<>	
UGS1186 0 </td <td>18 m 19</td>	18 m 19
UGS1187 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
UGS1188 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
	0 0
	0 0
UGS1189 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1190 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1191 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1193 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1194 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1195 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1196 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0	0 0
UGS1197 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1198 0 0 0 0 0 0 0 0 0 + + 0 0 0 + + 0 0 0 + 0 0 + 0 0 0 0	0 0
UGS1199 0 0 0 0 0 0 0 0 0 + + 0 0 0 + + + + + 	0 0
UGS1200 0 0 0 0 0 0 0 0 0 + 0 0 0 + 0 0 0 0	0 0
UGS1201 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + + + +? ++ 0 + 0	0 0
UGS1202 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1203 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1204 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1205 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1206 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1208 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1209 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1210 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0	0 0
UGS1211 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1212 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1213 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + + 0 0 0 0 0 0	0 0
UGS1214 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + + + ++? ++ 0 + 0	0 0
UGS1215 0 0 0 0 0 0 0 0 + + + +? ++ 0 + 0	0 0
UGS1216 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1217 0 0 0 0 0 0 0 0 + 0 0 0 + + ++? ++ 0 + 0	0 0
UGS1218 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1219 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1221 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1222 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 + 0	0 0
UGS1223 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1224 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0	0 0
UGS1225 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1226 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1227 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1228 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1229 0 0 0 0 0 0 0 0 + 0 0 0 + + + +? ++ 0 + 0	0 0
UGS1230 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1231 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
	0 0
UGS1233 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1235 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0
UGS1236 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + ++? + 0 0 0	0 0
UGS1237 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1238 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0	0 0
UGS1239 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + +++? + 0 0 0	0 0
UGS1240 0 0 0 0 0 0 0 0 0 0 + + 0 0 0 + + 0 0 0 + 0 0 + 0 0 0 0	0 0

									SA ob	jectiv	es								
	Employment	Economy	Education	Health	Amenity	Services and Facilities	Crime	Recreation	Housing	Sustainable Transport	Efficient land use	Landscape	13: Historic Environment	14: Biodiversity and geodiversity	Pollution	Flooding	17: Waste	18: Efficient use of materials	Climate change
Site	1: Er	2: Ec	3: E	4: H	5: Ar	6: Se	7: Cr	8: R	9: Hc	10: \$	11.	12: 1	33	4: Feod	5.	16: F	7: /	8: E	19: (
option UGS1241	0	0	0	4	0	0	0	+	0	0	0	+	+?	+ 0	0	0	0	0	0
UGS1242	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1243	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1244	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1245	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1246	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1247	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1248	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1249 UGS1250	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	0	0	0	0
UGS1251	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1252	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1253	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1254	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1255	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1256	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1257	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1258	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1259 UGS1260	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1260	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1261	0	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0	0	0	0
UGS1263	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1264	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1265	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1266	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1267	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1268	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1269	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1270	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1271 UGS1272	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1272	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1274	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1275	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1276	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1277	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1278	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1279	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1280 UGS1281	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1281 UGS1282	0	0	0	0	0	0	0	+	0	0	+	+	++?	+	0	+	0	0	0
UGS1282	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1284	0	0	0	0	0	0	0	+	0	0	+	+	++?	+	0	0	0	0	0
UGS1285	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1286	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS1287	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS1288	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1289	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1290	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1291	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1292 UGS1293	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1293	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1271	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0

Section Part										SA ob	jectiv	es								
Section Sect		nployment	onomy	ucation	alth	nenity	rvices and Facilities	ime	creation			nse	andscape	listoric Environment	iodiversity and versity	ollution	looding	Vaste	ent use	limate change
Control Cont								<u>ن</u>						.: T	4: B eodi				3: E ate	
USS1298 0																				
USS13969 0. 0. 0. 0. 0. 0. 0. 0																				_
USS1390																				
USS1300												<u> </u>								_
Minimary Minimary		0	0	0	0	0	0	0		0	0	0				0		0	0	0
USS1303	UGS1301	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
USS1390	UGS1302	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
Discription Color Color								0	+				+		_	0	0			
USS1310															_					_
USS1319	-													_						
UGS1310 C																				_
USS1310														_						_
USS1312		0	0	0	0	0	0	0		0	0	0				0		0	0	0
UGS1315 O	UGS1311	0	0	0	0	0	0	0	+	0	0	+	++	++?	++	0	++	0	0	0
UGS13161 O	UGS1312	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS1317		0	0	0	0	0	0	0	+	0	0	+	+	++?	+	0	+	0	0	0
UGS1318									+				+	_						_
UGS1319																				
UGS1430																				
UGS1432														_						
UGS1433																				_
UGS1434 O														_						_
UGS1436	UGS1434	0	0	0	0	0	0	0	+	0	0	0	+		+	0	0	0	0	0
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8 SA findings for the Traveller Site options

- 8.1 This section presents the SA findings for the Traveller site options that are being considered by Kirklees Council for allocation in the emerging Local Plan.
- 8.2 A total of 37 reasonable alternative Traveller site options have been subject to SA by Kirklees Council. The work was carried out following the methodology set out by LUC but the appraisal work for the Traveller sites was undertaken by Council officers. A set of SA assumptions was devised to ensure that the reasonable site options could be appraised consistently these assumptions are presented in **Appendix 4** (see Table A4.5).
- 8.3 The likely effects of the Traveller site options are summarised below in relation to each SA objective. Particular consideration has been given to the likely significant effects identified (both positive and negative), in line with the requirements of the SEA Regulations. Where relevant, effects are classified as either short, medium or long-term. Consideration is also given to potential mitigation measures that could reduce or offset the negative effects identified, including mitigation that may be provided by policies in the emerging Local Plan.
- 8.4 The SA scores for all of the reasonable Traveller site options are presented in **Table 8.1** at the end of the chapter, and the detailed SA matrices for the Traveller site options are available in the separate **Annex 5**.
- 8.5 **Annex 5** also presents the maps that are referred to throughout this section. Those maps show the locations of the site options that are likely to have significant effects (both positive and negative were relevant) on the various SA objectives. A small number of the maps also show minor effects, where relevant.
- 8.6 **Map T1** in **Annex 5** shows the locations and boundaries of all of the Traveller site options (the small size of some of the options means that it has been necessary to indicate their location with coloured dots on Maps **T2-T19**, rather than the actual site boundary).
- 8.7 The summary focuses on the key messages coming out of the SA and identifies the key issues of relevance to the Council's decision making regarding which sites to allocate for Traveller sites in the Local Plan (as described in **Chapter 2**, this summary was provided to the Council before the Draft Local Plan was finalised, in order that the findings could be used to inform decision making). Along with the SA findings, other factors were also taken into account by the Council including the deliverability of the sites. Information about the reasons for selecting or rejecting each Traveller site option is provided in **Appendix 5**.

Summary of effects by SA objective

SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible

8.8 The location of the Traveller sites allocated in the Local Plan will not affect the number and range of employment opportunities available in Kirklees. However, if Traveller sites are well-located in relation to employment nodes and are well-connected to those areas via sustainable modes of transport, the people living there will be more easily able to access jobs. This will be particularly beneficial for people without a car. While employment opportunities will also be located outside of the identified employment nodes¹⁴, these provide an indication of the key employment areas in the District.

¹⁴ Employment sites with over 1,000 employees as shown in the LTP3 dataset, which was used in the heatmapping work by Kirklees Council.

- 8.9 The appraisal of the Traveller site options against this SA objective was informed by the heatmapping work which was undertaken for Kirklees Council, specifically the information about journey times via sustainable modes of transport from each Traveller site option to the nearest employment node. The locations of potential employment site options being considered for allocation in the Local Plan were not taken into account during the appraisal of Traveller site options at this stage, as there is currently no certainty about whether or not those employment sites will eventually be allocated. The relative proximity of the preferred sites for employment development and Traveller sites will be assessed during later stages of the SA once preferred sites have been identified by the Council.
- 8.10 Significant positive effects alone were identified in relation to 21 of the 37 Traveller site options, as those sites are located mainly or entirely within 20 minutes travel time of an employment node via sustainable modes of transport. A further four sites would have significant positive effects in relation to part of the site, but either minor positive or significant negative effects were likely for the rest of the site this was because levels of access to employment nodes were variable within those sites but in all cases at least part of the site was found to be within 20 minutes of an employment node. The locations of the sites that would have entirely or partly significant positive effects on this SA objective are shown in Map T2.
- 8.11 It can be seen that the Traveller site options that have the best levels of access to employment nodes are almost exclusively located in the north and east of the District. This is unsurprising as those are the most urban areas of the District where the employment nodes would be expected to be located. In the south eastern part of the District, away from the main urban areas of Huddersfield, Cleckheaton and Dewsbury, there are very few Traveller site options that are within 20 minutes of an employment node, and no Traveller site options have been identified in the south western part of the District. While there will be other opportunities for accessing jobs outside of those employment nodes, locating Traveller sites in and around the main urban areas in the north and east of Kirklees will mean that people have generally easier access to jobs via non-car based modes of transport, with journey times likely to be shorter.
- 8.12 Six of the Traveller site options would have an entirely or partly significant negative effect on this SA objective, as either all or part of the site is more than 50 minutes travel time away from an employment node via sustainable modes of transport. The locations of those sites are shown in **Map T3**. All of the Traveller sites that have been highlighted as having a significant negative effect (either as an individual or combined effect) on access to employment are located outside of the main urban centres in Kirklees. These six sites (GTTS1962 and GTTS1963 which would have entirely significant negative effects, and GTSS2042, GTTS2045, GTTS2059 and GTTS2060 which would have partly significant negative effects) are spread throughout the District, mainly towards the north and east. None of the Traveller site options are located in the more rural south west part of the District where employment opportunities are likely to be more limited.
- 8.13 Eight of the traveller site options would have either minor positive, negligible or minor negative effects on this SA objective, as they are between 20 and 50 minutes from the nearest employment node via sustainable transport. The remaining two traveller site options have been identified as having a mixed effect (significant positive/minor positive) on this SA objective as areas within these sites are located within variable travel times of the nearest employment node.
 - SA objective 2: Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship
- 8.14 The location of the Traveller sites that are allocated in the Local Plan will not affect the success of the local economy. While the development of Traveller sites may result in a limited amount of job creation during the construction phase, this will not be influenced by the location of the development. The development of Traveller sites may also affect the size and location of the local workforce; however this is considered separately under SA objective 1 above. Therefore, the effects of all of the 37 Traveller site options on SA objective 2 are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 3: Ensure education facilities are available to all

- 8.15 The effects of new Traveller sites on this SA objective will depend to some extent on the availability of school and college places to serve the growing population, which is unknown at this stage. While new schools may be allocated in the new Local Plan, their potential locations were not taken into account in the appraisal of Traveller site options against this SA objective as there is not enough certainty at this stage about their delivery.
- 8.16 Effects on this SA objective will therefore depend on how accessible existing schools and colleges are from Traveller site options, although there are uncertainties as the effects will depend on there being capacity at those schools and colleges to accommodate new pupils. Information about access to existing schools was taken from the accessibility heatmapping work that was undertaken for Kirklees Council. The heatmapping work assessed the journey times from each Traveller site option to primary and secondary schools, as well as further education facilities, via sustainable modes of transport.
- 8.17 Potential significant positive effects alone were identified in relation to 14 of the 37 Traveller site options as they are mainly or entirely within 0-15 minutes journey time (via non-car based modes of transport) of a primary school and 0-20 minutes of a secondary school. Some are also within 30 minutes travel time of a further education facility. A further four sites would have significant positive effects in relation to part of the site, but either minor positive or significant negative effects for the remainder of the site as levels of access to education facilities were variable within different parts of those sites. The locations of the sites that would have entirely or partly significant positive effects on this SA objective are shown in **Map T4**. Unsurprisingly, levels of access to schools and colleges were best for the Traveller site options in the more urbanised areas of the District, i.e. in and around Huddersfield, Cleckheaton and Dewsbury.
- 8.18 Only four of the 37 Traveller site options (GTTS1962, GTTS2042, GTTS2045 and GTTS2060) are likely to have either an entirely or partly significant negative effect on access to education as at least part of those sites are more than 30 minutes from a primary school and more than 40 minutes from a secondary school. Of those four sites, only one (GTTS1962, on the eastern edge of the District on the border with Barnsley) is likely to have an entirely significant negative effect, while the other three sites could have a mixture of significant negative and either minor or significant positive effects because levels of access vary within the sites. The locations of those four site options are shown in **Map T5** (note GTTS2045 is on the northern boundary of the District on the border with Bradford). The sites that are likely to have a significant negative effect in relation to access to education are located outside of the main urban centres. These four sites were also amongst those that were identified as having a likely significant negative effect in relation to access to employment opportunities (SA objective 1 above), emphasising their more isolated nature.
- 8.19 Therefore, allocating Traveller sites towards the main urban areas of the District will help to provide the best levels of access to schools, particularly for those without a car. However, the effects of the Traveller site allocations on this objective are uncertain as they will depend largely on whether nearby schools have capacity to accommodate additional pupils.

SA objective 4: Improve the health of local people and ensure that they can access the health and social care they need

- 8.20 The location of Traveller sites that are allocated through the Local Plan will not affect the number or distribution of healthcare facilities; however where existing healthcare facilities are easily accessible from Traveller sites there will be positive effects on enabling people to access the healthcare that they need.
- 8.21 Of the 37 Traveller site options in Kirklees, five (GTTS1957, GTTS1958, GTTS2039, GTTS2053 and GTS2063) are likely to have a significant positive effect alone on this SA objective as they are within 0-15 minutes journey time (via non-car based modes of transport) of a GP and are also within 0-30 minutes of a hospital. One other site option (GTTS2043) is likely to have a significant positive effect as part of a mixed effect overall, because levels of access to healthcare vary within the same site.

- 8.22 The locations of the sites that would have entirely or partly significant positive effects on health are shown in **Map T6** (note that GTTS1958 is on the north western boundary of the District on the border with Calderdale). It can be seen that the sites with the most positive effects on this SA objective are located in the central areas near Huddersfield (GTTS1958 and GTTS2063) and Dewsbury (GTTS1957, GTTS2039) and Batley (GTTS2053). This reflects the location of the District's hospitals. Considering only access to GPs, levels of accessibility are much better as there are many more GPs than hospitals, and they are more widely distributed throughout the District.
- 8.23 Six of the 37 Traveller site options (GTTS1962, GTTS1963 GTTS2042, GTTS2045, GTTS2059 and GTTS2060) are likely to have a significant negative effect on this SA objective and in all but two cases this was part of a mixed effect overall, with part of the site area likely to have either a minor positive or negligible effect due to variable levels of access to healthcare facilities from different parts of the sites. At least parts of those six sites were identified as being either more than 30 minutes from a GP or being more than 60 minutes from a hospital. The locations of those sites are shown in **Map T7**. They are mainly located on the periphery of urban areas in the north and east of Kirklees, with GTTS2045 on the border with Bradford and GTTS1962 on the border with Barnsley.
- 8.24 Two AQMAs have been declared in Kirklees, both in the north of the District one covers two sections of the Leeds Road A62 (in the vicinity of the junctions with the A6107 Bradley Road, and with the A644) and the other is along part of the Huddersfield Road A644. If Traveller sites are allocated in those areas, residents' health may be adversely affected by poor air quality. Two of the Traveller site options are directly linked to an AQMA by road GTTS1960 and GTTS1954 and therefore minor negative effects were identified for that reason.

SA objective 5: Protect local amenity including avoiding noise and light pollution

- 8.25 Where new Traveller sites are proposed within close proximity of sensitive receptors such as existing houses, schools or hospitals there may be negative effects on amenity as a result of increased noise and light pollution. Such effects would be largely short term during the construction phase but there may be ongoing increases in noise associated with traffic movements and general human activity. At the same time, new Traveller sites within close proximity of major roads or railways or industrial areas may result in noise pollution affecting residents of the sites over the longer term.
- 8.26 All 37 Traveller site options were identified as having a likely negative effect (either significant or minor) on amenity (either for residents of the sites or existing residents nearby) given that they are all located either within close proximity of sensitive receptors or strategic transport routes or industrial sites. Of the 37 Traveller site options, 32 were identified as having a likely significant negative effect on this SA objective either because they are surrounded by existing residential development or other sensitive receptors, or because they are directly adjacent to an 'A' road, motorway or railway line or an industrial area. The locations of those sites are shown in **Map T8**, which also shows the locations of key transport routes which can affect the amenity of nearby residents. The sites that are likely to have a significant negative effect are mainly clustered around the most heavily urbanised areas of the District, including in Huddersfield, Holmfirth, Batley, Cleckheaton and Dewsbury.
- 8.27 The five remaining Traveller site options could have a minor negative effect on amenity, particularly over the short term during the construction phase, as they are not surrounded by existing residential development or other sensitive receptors but have such receptors within 100m. No likely positive effects, either minor or significant, were identified in relation to this SA objective.
- 8.28 Therefore, when considering which Traveller site options to allocate in the Local Plan, proximity to key roads should be taken into account and appropriate mitigation will need to be built into the plan and specific development proposals for the sites. Measures such as ensuring the use of good practice construction techniques may help to reduce the short-term impacts associated with construction; however there is inevitably a balance to be struck between locating Traveller sites in

close proximity to the urban areas of Kirklees that have the best access to jobs, services and facilities and the need to protect the amenity of existing and new residents.

SA objective 6: Retain and enhance access to local services and facilities

- 8.29 The location of the Traveller sites allocated in the Local Plan will not directly affect the number or range of services in a particular location; however where Traveller sites are developed in close proximity to existing services and facilities, residents would have good access to these services and facilities.
- 8.30 The appraisal of the Traveller site options against this SA objective has been based on the heatmapping work undertaken on behalf of Kirklees Council, in particular the assessment of each site's accessibility to local and town/district centres. Those centres have been taken as a proxy indicator of access to services, because they have been classified on the basis of what services and facilities are available there.
- 8.31 Of the 37 Traveller site options, only two are likely to have either an entirely (GTTS2054) or partly (GTTS2062) significant positive effect on access to services as either all or part of those sites are within 0-5 minutes journey time (via non-car based modes of transport) of a local centre and are also within 0-15 minutes of a town/district centre. The locations of those sites are shown in **Map T9**.
- 8.32 The two sites that are likely to have a significant positive effect on this SA objective because they would provide a good level of access to services and facilities are located in or near the more urban areas of Holmfirth and Huddersfield. While locating Traveller sites in the main urban areas is likely to ensure that residents have the best level of access to existing services and facilities, it is also important to ensure that existing services and facilities do not become overloaded by increased demand. However, given the small proportion of population likely to make use of Traveller site allocations in Kirklees, this type of effect is unlikely.
- 8.33 A further eight of the Traveller site options are likely to have either an entirely or partly significant negative effect on this SA objective as they are either entirely or partly more than 15 minutes from a local centre and more than 30 minutes from a town/district centre. The locations of those sites are shown in **Map T10** and they can be seen to be outside of the main urban centres.

SA objective 7: Make our communities safer by reducing crime, anti-social behaviour and the fear of crime

8.34 The effects of allocating new Traveller sites on levels of crime and fear of crime will depend on factors such as the incorporation of green space within the sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of Traveller sites allocated through the Local Plan; rather they will be determined through the detailed proposals for each site. Therefore, the effects of all of the 37 Traveller site options on this SA objective are negligible and no likely significant effects (either positive or negative) were identified.

SA objective 8: Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage

- 8.35 The effects of the Traveller sites allocated in the Local Plan on this SA objective will depend in part on the provision of open space and green infrastructure within the new development, which is unknown at this stage. However, proximity to existing recreational facilities and areas of open space will also influence effects, particularly if these facilities are within walking distance (taken to be 600m).
- 8.36 Of the 37 Traveller site options, the majority (24) are within 600m of three or more existing areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways and so are likely to have a significant positive effect on this SA objective. The locations of these sites are shown in **Map T11**. Only one site option (GTTS2049) is not within 600m of any areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways and is therefore likely to

have a minor negative effect on this SA objective. This site is located in the village of Denby Dale in the south east of the District.

8.37 The remaining twelve Traveller site options are located within walking distance of either one or two existing recreation facilities such as open spaces. Therefore, in general levels of access to recreation and leisure facilities are good or very good from the majority of the Traveller site options.

SA objective 9: Ensure all people are able to live in a decent home which meets their needs

8.38 All of the potential Traveller sites are expected to have positive effects on this objective, due to the nature of the proposed development which would help to meet the identified local need for Traveller sites. It is therefore expected that all 37 of the Traveller site options would have a significant positive effect on this SA objective.

SA objective 10: Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport

- 8.39 How well connected Traveller sites are to services, facilities and employment opportunities by sustainable modes of transport will affect the extent to which residents are able to make use of non car-based modes of transport day to day.
- 8.40 The assessment of Traveller site options against this SA objective was informed by the heat mapping work that was carried out on behalf of Kirklees Council. Each site option was assessed in terms of its accessibility to eight different features¹⁵ via sustainable modes of transport, with the outputs being mapped on a scale of green to red. Sites are mapped as green (and therefore considered as having good access) for the feature in question when they are within the journey time standards set out by the Department for Transport¹⁶, which vary for each of the eight features. Therefore, the more features that a site is classed as 'green' for, the more easily residents will be able to use sustainable transport to undertake day to day journeys.
- 8.41 Twenty three of the 37 Traveller site options are likely to have a significant positive effect on this SA objective as they are mapped as 'green' for at least four of the eight features. The locations of those sites are shown in **Map T12**.
- 8.42 A further five of the Traveller site options are likely to have a significant negative effect as they are not mapped as 'green' for any of the eight features assessed in the heatmapping work. The locations of those sites are also shown in **Map T13**.
- 8.43 The remaining nine site options would have a minor positive effect as they are mapped as green for between one and three of the eight features.
- 8.44 Unsurprisingly, opportunities to make use of sustainable modes of transport day to day are likely to be highest where sites are in the main urban areas, i.e. around Huddersfield, Cleckheaton and Dewsbury. The site options further to the south and east are likely to offer less good opportunities and may result in higher levels of increased car traffic in the District.

SA objective 11: Secure the efficient and prudent use of land

- 8.45 Where development takes place on greenfield land or areas of high quality agricultural land it is a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land.
- 8.46 None of the Traveller site options are expected to have a significant negative effect on this SA objective as none are on Grade 1 Agricultural Land (there is no land of this grade within Kirklees).
- 8.47 The majority of the Traveller site options are located on greenfield land, and in many cases this is also Grade 3 Agricultural Land and therefore a minor negative effect is expected for those sites on

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¹⁵ Employment nodes, primary schools, secondary schools, further education facilities, GPs, hospitals, local centres and town/district centres.

¹⁶ Department for Transport (October 2014) Accessibility Statistics: Guidance

- this SA objective. These sites are mainly in the north, east and central areas of the District, correlating with where the main areas of Grade 3 Agricultural land are found.
- 8.48 **Map T14** shows the location of the sites which are expected to have a minor negative effect on efficient land use in Kirklees. Considering the distribution of the high quality agricultural land in the District, locating Traveller sites towards the south of Kirklees could potentially make it easier to avoid the loss of high quality agricultural land. However, this needs to be balanced with the wider sustainability disadvantages of locating development further from the main urban centres considering the more rural nature of the southern part of the District.
- 8.49 Only one Traveller site option (GTTS2039) was located on brownfield land and is therefore expected to have a minor positive effect on this SA objective. This site is located in the urban area of Dewsbury. If this brownfield site is eventually allocated for development, consideration should be given to the extent to which it may be possible to make use of onsite buildings and materials.

SA objective 12: Protect and enhance the character of Kirklees and the quality of the landscape and townscape

- 8.50 A small area in the south of Kirklees lies within the Peak District National Park. Development within that part of the District could therefore have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known. No Traveller site options are located within 500m of the National Park and therefore no significant negative effects were identified in relation to the landscape and townscape in Kirklees.
- 8.51 Outside of designated landscape areas, where development will take place on greenfield land, the character of the local environment is more likely to be affected. However, effects are uncertain depending on the design of new development and the quality of the landscape. Where a brownfield site is redeveloped it is likely that the overall character and appearance of the site will be improved as a result of new development, which is assumed to be of high quality, and this may benefit the appearance of the landscape/townscape. However, this is uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously.
- 8.52 Most of the Traveller site options (36 out of 37) are expected to have an uncertain minor negative effect on SA objective 12 as they will result in development on greenfield land, however, as noted above, new development could be designed sympathetically and may not have a negative effect (e.g. through the use of planting, green roofs). The location of those sites is shown in **Map T15**. Given the large number of sites, and considering that all but one of the sites are located on greenfield land, there is no identifiable correlation between the location of Traveller sites within different parts of the District and the likelihood of positive or negative effects on this SA objective; rather effects will depend purely on whether the site has been previously developed or not. Only one site option (GTTS2039) is located on brownfield land and therefore could have a positive effect on the quality of the landscape and townscape in Kirklees. This site is located in Dewsbury to the north east of the District.

SA objective 13: Conserve and enhance the historic environment, heritage assets and their settings

- 8.53 Judgements about the likely effects of the Traveller site options on the historic environment have been based on information provided by Historic England (formerly English Heritage). Each site has been rated by Historic England as either red, orange, yellow or green based on what it considers to be the likely effects on the historic environment of developing the site in question. Those judgements have been converted directly into SA scores.
- 8.54 One Traveller site option (GTTS1962) was rated by Historic England as 'red' on the basis that the development of the site is likely to result in substantial harm to a designated heritage asset. The site lies within Bretton Hall, a Registered Park and Garden. One other site (GTTS1964) could have a minor negative effect as it was assessed by Historic England as 'yellow', meaning that the allocation of the site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies

- for managing change to the historic environment. There are a number of listed structures within very close proximity of the site, including one (John Ramsdens Lock) directly adjacent to the south west.
- 8.55 The Traveller site options are mainly located outside of the main urban centres in the northern part of Kirklees, in and around Huddersfield, Batley and Cleckheaton, where there is a denser concentration of heritage assets such as listed buildings in comparison to the rural areas. This is reflected in the low number of negative effects identified in relation to the historic environment. The two potential negative effects that have been identified are in any case uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).
- 8.56 Twelve sites were identified by Historic England as 'orange' because their likely effects on the historic environment are uncertain (this is also reflected in an uncertain SA score). The locations of the sites that could have significant or minor negative effects, and those where the effects are uncertain, are shown in **Map T16**.
- 8.57 The remaining 23 sites were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those 23 sites are therefore most likely to have a negligible effect on this SA objective although this is again uncertain depending on the detailed proposals for the sites. No likely positive effects (minor or significant) were identified in relation to any of the Traveller site options.
- 8.58 If the Council is considering allocating any of the sites that have been identified as having potential negative or uncertain effects on the historic environment, the detailed information provided by Historic England about the heritage features that could be affected by development should be drawn on and consideration given to the potential for mitigation. Any mitigation that is required should be built into the relevant Local Plan policies.

SA objective 14: Maximise opportunities to protect and enhance biodiversity and geodiversity

- 8.59 Traveller site options that are within close proximity of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, trampling etc. Conversely, there may be opportunities to promote habitat connectivity if Traveller sites include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists as the distance at which effects might occur is not the same for all types of habitats and species, and appropriate mitigation may avoid adverse effects and may even result in beneficial effects.
- 8.60 In addition to potential effects on nearby designated sites, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential Traveller sites cannot be determined at this strategic level of assessment (as site surveys have not been undertaken). This would need to be determined once more specific proposals are developed and submitted as part of a planning application. Distances of 250m and 1km have been used as an indication of proximity, as there are no standard distance thresholds available and it is recognised that the distance over which effects may occur vary between habitats and species and the types of effect being considered. This level of detail cannot be determined as part of the SA. In relation to impacts on European sites, the findings of the Habitats Regulations Assessment (HRA) will be taken into account in the SA as they become available.
- 8.61 Eight of the Traveller site options were identified as having a potentially significant negative effect on this SA objective as they are within 250m of one or more designated biodiversity or geodiversity sites. The locations of those site options are shown in **Map T17**. Most of the sites that could have a significant negative effect on biodiversity are located outside of the main urban areas, reflecting the location of the majority of the District's designated nature conservation sites. Therefore, focussing most development in the main urban areas of Kirklees may help to steer development away from designated sites. However, urban areas can still harbour valuable

- biodiversity and the need to incorporate mitigation for impacts on non-designated features should be addressed by the Council as it prepares the relevant Local Plan policies.
- 8.62 A further 14 Traveller site options were identified as having a potential minor negative effect on this SA objective as they are between 250m and 1km from one or more designated biodiversity or geodiversity sites. The remainder of the site options (15) are most likely to have a negligible effect although this is again uncertain until the design and layout of the sites are known, as there may be opportunities to incorporate biodiversity enhancements. No likely positive effects (minor or significant) on this SA objective were identified in relation to any of the site options.

SA objective 15: Reduce air, water and soil pollution

- 8.63 The specific location of Traveller sites within Kirklees would not have a direct effect on levels of soil or water pollution, which would instead be influenced by factors such as whether there is capacity at the District's sewage treatment works to treat the additional wastewater generated by the overall scale of development proposed. Issues associated with soils are addressed separately under SA objective 11 above.
- 8.64 Development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic from population growth in those areas could compound existing air quality problems, although the number of vehicle movements associated with a Traveller site is unlikely to be significant. As described under SA objective 4: health above and shown in **Map T18**, those two AQMAs are located in the north of the District one covers two sections of the Leeds Road A62 (in the vicinity of the junctions with the A6107 Bradley Road, and with the A644) and the other is along part of the Huddersfield Road A644.
- 8.65 Two of the Traveller site options (GTTS1960 and GTTS1954) were identified as likely to have a minor negative effect on this SA objective as they are directly linked by road to an AQMA. The locations of those sites, and the AQMAs, are shown in **Map T18**. Therefore, development in those locations could result in additional emissions from vehicle traffic in areas already affected by poor air quality.

SA objective 16: Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people

- 8.66 The development of new Traveller sites on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. National Planning Practice Guidance identifies caravans, mobile homes and park homes intended for permanent residential use as a 'more vulnerable use', which is suitable in areas of flood zone 1 but would require an exception test in flood zone 2 and is unsuitable in flood zones 3a and 3b.
- 8.67 While new development in any location may offer good opportunities to incorporate SuDS, and therefore have a positive effect on reducing flood risk, this would depend on the design of the proposed development and not on the location of the site.
- 8.68 Three of the Traveller site options (GTTS1954, GTTS1955 and GTTS1956) are likely to have a significant negative effect on this SA objective as they are entirely or mainly on greenfield land that is within flood zones 2 or 3. The locations of those sites are shown in **Map T19** which also shows the location of flood zones 2 and 3 in Kirklees. It can be seen that the parts of the District that are at the highest risk from fluvial flooding are in the north and centre of Kirklees, around the Rivers Colne (north-east of Huddersfield) and Calder (east of Mirfield and south of Dewsbury). Across the District there are other smaller areas of flood zones 2 and 3, particularly around Fenay Beck (east of Almondbury), the River Holme (south of Huddersfield), River Colne (south-west of Huddersfield) and the River Spen around Heckmondwike.
- 8.69 The remaining 34 of the Traveller site options are likely to have a minor negative effect. In most cases (33 sites) this is because they are on greenfield land but are located outside of flood zones 2 and 3 and so are likely to have a minor negative effect given that they will result in an increase in the area of impermeable surfaces in the District, but not in the areas of highest flood risk. One

- site (GTTS2039) is likely to have a minor negative effect because, although it is on brownfield land, it is in flood zone 3.
- 8.70 It is recommended that the four sites in flood zone 2 and 3 (GTTS1954, GTTS1955, GTTS1956 and GTTS2039) are not allocated as Traveller sites in the Local Plan, unless the exception test can be met. If these sites are taken forward for development it is essential that appropriate mitigation is incorporated this may involve only developing any part of a site which is outside of flood zones 3 and 2 and instead using that land for open space.

SA objective 17: Increase prevention, re-use, recovery and recycling of waste close to source

- 8.71 The development of new Traveller sites is likely to involve an increase in waste generation, regardless of location, but may also offer good opportunities for incorporating sustainable waste management practices (e.g. through sustainable construction but also designing new developments to incorporate space for storage and collection of recyclables).
- 8.72 Where Traveller sites are proposed on brownfield land there may be opportunities for re-using existing buildings and materials although this is uncertain depending on the previous use of the site. Of the 37 Traveller site options, only one site (GTTS2039) was identified as having a potential minor positive effect on this SA objective as it is located on brownfield land, while the remaining 36 sites would have a minor negative effect as they are located on greenfield land. The one site with a potential positive effect on this SA objective is located in the urban area of Dewsbury to the north east of Kirklees.

SA objective 18: Increase efficiency in water energy and raw material use

- 8.73 While all new Traveller site development is likely to involve an increase in energy and water consumption this will not be influenced by the location of the sites. In addition, new development may offer good opportunities for incorporating renewable energy generation and water efficiency measures.
- 8.74 Similarly, all developments will result in the increased consumption of minerals for construction but this will not be influenced by the location of Traveller sites and given the nature of those sites, increases in consumption of minerals will be minimal. The location of Traveller sites can influence the efficient use of minerals depending on the proximity of the development to Minerals Safeguarding Areas as development in those areas may sterilise mineral resources and restrict the availability of resources in the District. However, because of the extent of minerals resources within Kirklees, all site options would have the same effect. In addition, not all of the resources would necessarily be economically viable and it may be possible to achieve prior extraction to avoid sterilisation. Therefore, all 37 Traveller site options would have a negligible effect on this SA objective and no likely significant effects (either positive or negative) were identified for any of the options.

SA objective 19: Reduce the contribution that the District makes to climate change

- 8.75 Where Traveller sites are well-connected by sustainable transport links to employment nodes, services and facilities, levels of car use and the associated greenhouse gas emissions are likely to be lower. Therefore, as for SA objective 10 above, the likely effects of the sites on this objective were determined on the basis of the heatmapping work that has been carried out for Kirklees Council and takes into account how well connected each site is to the eight features assessed.
- 8.76 As described above under SA objective 10, 23 of the 37 Traveller site options are likely to have a significant positive effect on this SA objective as they are mapped as 'green' for at least four of the eight features. The locations of those sites are shown in **Map T12**.
- 8.77 A further five of the Traveller site options are likely to have a significant negative effect as they are not mapped as 'green' for any of the eight features assessed in the heatmapping work. The locations of those sites are also shown in **Map T13**.
- 8.78 The remaining nine site options would have a minor positive effect as they are mapped as green for between one and three of the eight features.

8.79 Unsurprisingly, opportunities to make use of sustainable modes of transport day to day and therefore to reduce the level of emissions from car use are likely to be highest where sites in the main urban areas are allocated, i.e. around Huddersfield, Cleckheaton and Dewsbury. The site options further to the south and east of Kirklees are likely to offer less good opportunities and may result in higher levels of increased emissions from car use.

Summary of SA findings for the Traveller site options

- 8.80 **Table 8.1** overleaf shows the SA scores for all of the 36 Traveller site options.
- 8.81 Out of the 37 traveller site options, 33 (89%) have been found to have a likely significant negative effect on at least one of the SA objectives (not taking into account mixed effects that include a partial significant negative effect). Of these, 21 site options (57% of the total) are likely to have a significant negative effect on only one SA objective (generally SA objective 5: local amenity), and only five (14%) of the 37 sites would have a significant negative effect on four or more SA objectives. These are:
 - GTTS1960, GTTS1964 and GTTS2045 could have four significant negative effects.
 - GTTS1963 could have five potentially significant negative effects.
 - GTTS1962 could have eight potentially significant negative effects.
- 8.82 The purpose of the SA is not to identify sites that should or should not be allocated for development, as the SA is one of a number of tools to inform the Council's decision making. However, it is clear from the findings of the SA that there are Traveller site options that would be more likely to have a number of negative sustainability effects than others (such as the five sites listed above) and it may therefore be that those sites are less appropriate for residential development. In addition, it is recommended that the four sites in flood zone 2 and 3 (GTTS1954, GTTS1955, GTTS1956 and GTTS2039) are not allocated as Traveller sites in the Local Plan, unless the exception test can be met. If these four sites are taken forward for development it is essential that appropriate mitigation is incorporated this may involve only developing any part of a site which is outside of flood zones 3 and 2 and instead using that land for open space.
- 8.83 It is recognised however, that there is potential to mitigate many of the potential negative effects identified (in particular through development of appropriate policy safeguards within the Local Plan), and several of the effects are uncertain depending on the eventual development proposals that come forward for a site, as described earlier in this section.

Table 8.1: SA Scores for all of the 37 Traveller site options

Table 8.1:	SA Sc	ores	for all	of the	e 3/	Irave	ller s	ite op			•								
									SA o	bject	ives								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
GTTS1953	++	0	+?	0		+	0	+	++	++	-	-?	?	0?	0	-	-	0	++
GTTS1954	++	0	+?	+/-		0	0	+	++	++	-	-?	0?	?	-		-	0	++
GTTS1955	++	0	-/0?	+		0/-	0	++	++	+	-	-?	?	-?	0		-	0	+
GTTS1956	++	0	+?	+		0	0	++	++	++	-	-?	?	-?	0		-	0	++
GTTS1957	++	0	+/0?	++		+	0	++	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS1958	++/+	0	+/0?	++		-	0	++	++	+	-	-?	0?	?	0	-	-	0	+
GTTS1959	++	0	+/0?	+		-	0	++	++	+	-	-?	?	0?	0	-	-	0	+
GTTS1960	+	0	+/0?	+/0/-			0	++	++		-	-?	0?	-?	-	-	-	0	
GTTS1961	++/+	0	+?	+		0	0	++	++	+	-	-?	0?	0?	0	-	-	0	+
GTTS1962		0	?				0	+	++		-	-?	?	0?	0	-	-	0	
GTTS1963		0	+?				0	+	++	+	-	-?	0?	?	0	-	-	0	+
GTTS1964	++	0	0?	0		0	0	++	++		-	-?	-?	?	0	-	-	0	
GTTS2039	++	0	++/+?	++		+	0	++	++	++	+	+?	0?	-?	0	-	+?	0	++
GTTS2042	+/	0	++/?	+/		0/	0	++	++	+	-	-?	0?	?	0	-	-	0	+
GTTS2043	++	0	++?	+/++	-	0	0	+	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2044	++	0	++?	+	-	+	0	++	++	++	-	-?	?	?	0	-	-	0	++
GTTS2045	++/	0	++/?	+/		0/	0	++	++		-	-?	0?	?	0	-	-	0	
GTTS2046	++	0	+?	+			0	++	++	+	-	-?	?	?	0	-	-	0	+
GTTS2047		0	++?	+	-	+	0	+	++	++	-	-?	?	0?	0	-	-	0	++
GTTS2048	0	0	++?	+	-	+	0	+	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2049	++	0	++?	+		+	0	-	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2051	0	0	+?	+		+	0	++	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2052	++	0	++?	+		+	0	++	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2053	++	0	++?	++		0	0	++	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2054	-	0	++?	+		++	0	++	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2055	++	0	+?	0		-/0	0	++	++	+	-	-?	0?	0?	0	-	-	0	+
GTTS2056	++	0	++?	+		+	0	+	++	++	-	-?	?	-?	0	-	-	0	++
GTTS2057	++	0	++?	0	-	-	0	+	++	++	-	-?	?	0?	0	-	-	0	++
GTTS2058	++	0	++?	+		-	0	+	++	++	-	-?	0?	0?	0	-	-	0	++
GTTS2059	+/	0	+?	+/		+/	0	++	++	+	-	-?	0?	0?	0	-	-	0	+
GTTS2060	++/	0	+/?	0/		+/	0	++	++		-	-?	0?	-?	0	-	-	0	
GTTS2061	+	0	++?	+		+	0	+	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2062	++	0	++?	+		++/+	0	++	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2063	++	0	++/+?	++		+	0	++	++	++	-	-?	0?	-?	0	-	-	0	++
GTTS2064	+	0	++?	+		+	0	++	++	++	-	-?	?	-?	0	-	-	0	++
GTTS2065	+	0	+?	+		+	0	++	++	++	-	-?	?	-?	0	-	-	0	++
GTTS2487	++	0	+?	0		+	0	+	++	++		-?	?	0?	0	-		0	++
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9 SA findings for the Minerals Site Options

- 9.1 This section presents the SA findings for the minerals site options that are being considered by Kirklees Council for allocation in the emerging Local Plan.
- 9.2 A total of 37 reasonable alternative minerals site options have been subject to SA by Kirklees Council. The work was carried out following the methodology set out by LUC but the appraisal work for the minerals sites was undertaken by Council officers. A set of SA assumptions was devised to ensure that the reasonable site options could be appraised consistently these assumptions are presented in **Appendix 4** (see Table A4.6).
- 9.3 The likely effects of the minerals site options are summarised below in relation to each SA objective. Particular consideration has been given to the likely significant effects identified (both positive and negative), in line with the requirements of the SEA Regulations. Where relevant, effects are classified as either short, medium or long-term. Consideration is also given to potential mitigation measures that could reduce or offset the negative effects identified, including mitigation that may be provided by policies in the emerging Local Plan.
- 9.4 The SA scores for all of the reasonable minerals site options are presented in **Table 9.1** at the end of the chapter, and the detailed SA matrices for the minerals site options are available in the separate **Annex 6**.
- 9.5 **Annex 6** also presents the maps that are referred to throughout this section. Those maps show the locations of the site options that are likely to have significant effects (both positive and negative were relevant) on the various SA objectives. A small number of the maps also show minor effects, where relevant.
- 9.6 The summary focuses on the key messages coming out of the SA and identifies the key issues of relevance to the Council's decision making regarding which sites to allocate as minerals sites in the Local Plan (as described in **Chapter 2**, this summary was provided to the Council before the Draft Local Plan was finalised, in order that the findings could be used to inform decision making). Along with the SA findings, other factors were also taken into account by the Council. Information about the reasons for selecting or rejecting each minerals site option is provided in **Appendix 5**

Summary of effects by SA objective

SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible

- 9.7 Minerals sites would have positive effects on job creation during site preparation, operation and restoration. However, the total number of new employment opportunities likely to be provided within Kirklees is not considered to be significant and would not be influenced by the location of sites.
- 9.8 Employees at mineral sites are unlikely to be able to use sustainable transport to travel to work due to the predominantly rural location of most mineral sites.
- 9.9 Nonetheless, due to the potential for job creation, all 37 of the minerals site options are likely to have a minor positive effect on this SA objective. No likely significant effects, either positive or negative, have been identified for this SA objective.

SA objective 2: Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship

9.10 Minerals-related development would have a positive effect on the local economy in relation to maintaining or encouraging growth within the minerals industry. In addition, allocating minerals sites would help to secure the supply of aggregates required to support wider economic growth and development in the District and elsewhere. However, these factors would not be influenced by the specific location of minerals sites; therefore all 37 of the site options are likely to have a minor positive effect. No likely significant effects, either positive or negative, have been identified for this SA objective.

SA objective 3: Ensure education facilities are available to all

9.11 The location of minerals sites would not have a direct effect on access to education and all of the 37 site options would therefore have a negligible effect. No likely significant effects, either positive or negative, have been identified for this SA objective.

SA objective 4: Improve the health of local people and ensure that they can access the health and social care they need

- 9.12 Minerals sites near to sensitive receptors such as residential areas could affect people's health or their perceptions of health. Dust from blasting/drilling and other sources within the site may cause concern to nearby residents and communities; however government research¹⁷ excluded any health effects of dust generated by surface mineral operations. Therefore, it is not considered likely that mineral extraction in Kirklees would have a significant negative effect on health, although minor negative effects may be experienced or perceived by some people living or working close to sites.
- 9.13 National Planning Practice Guidance for Minerals¹⁸ states that the relationship of the activities within mineral workings to surrounding land uses, in regards to dust emissions, will vary from site to site. Since the nature of those land uses varies, so will their sensitivity to dust. Evidence included in the former Annex I: Dust of Minerals Policy Statement 2 and National Planning Practice Guidance for Minerals, states that residents can be affected by dust up to 1km from the source, and that additional measures to control PM₁₀ might be necessary if the actual source of emission is within 1km of any residential property or other sensitive use. However, former Annex I of Minerals Policy Statement 2 also states that concerns about dust are most likely to be experienced near to dust sources, generally within 100m depending on site characteristics and in the absence of appropriate mitigation.
- 9.14 The NPPF is clear that minerals planning authorities should ensure that unavoidable dust emissions are controlled and mitigated or removed at source. Therefore it is assumed that mineral extraction at any of the potential sites will be well operated and that mitigation measures implemented should be sufficient to avoid any potential health effects.
- 9.15 Most of the minerals site options (30 out of 37 or 81%) are within 100m of sensitive receptors and so could have minor negative effects on health as a result of dust; however this is uncertain depending on factors such as topography, the nature of the landscape, the respective location of the site and the nearest residential property or other sensitive use in relation to the prevailing wind direction and visibility. The locations of those sites are shown in **Map M1** and it can be seen that while some of the sites are close to the edges of the main urban settlements of Huddersfield and Dewsbury, most of the sites with minor negative effects are in more rural locations in the south of the District.
- 9.16 The remaining seven minerals site options are more than 100m from sensitive receptors and so would have a negligible effect on this objective. No likely significant effects, either positive or negative, have been identified for this SA objective.

¹⁷ Office of the Deputy Prime Minister (by Arup Environmental/Ove Arup and Partners). The Environmental Effects of Dust from Surface Minerals Workings, 1995.

¹⁸ Available at: http://planningguidance.planningportal.gov.uk/blog/guidance/minerals/assessing-environmental-impacts-from-minerals-extraction/dust-emissions/.

SA objective 5: Protect local amenity including avoiding noise and light pollution

- 9.17 Minerals sites could affect local amenity as a result of noise, vibration and light pollution during site preparation, operation and restoration as well as the transporting of minerals from the site. The extent of effects on local amenity will depend on the type of mineral extracted on the site, the scale of the operations and the type of activities undertaken within the site, as well as the proximity of sensitive receptors.
- 9.18 All of the 37 site options are identified as having a potential minor negative effect on this SA objective as they are either coal and sandstone sites which are within 500m of sensitive receptors or they are sand and gravel, clay and shale sites which are within 250m of sensitive receptors. In all cases, the potential minor negative effect is uncertain depending on the scale of the operations and the type of activities undertaken within the site and potential mitigation measures proposed.
- 9.19 The locations of all 37 minerals site options, all of which could have a minor negative effect on this SA objective, are shown in **Map M2** and it can be seen that most of the mineral sites are in more rural locations in the south and west of the District, although there are a few sites options close to the edges of the main urban settlements of Huddersfield and Dewsbury.

SA objective 6: Retain and enhance access to local services and facilities

9.20 The location of minerals sites would not have a direct effect on access to services and facilities and all of the 37 site options would therefore have a negligible effect. No likely significant effects, either positive or negative, have been identified for this SA objective.

SA objective 7: Make our communities safer by reducing crime, anti-social behaviour and the fear of crime

9.21 The location of minerals sites would not have a direct effect on levels of crime and the fear of crime and all of the 37 site options would therefore have a negligible effect. No likely significant effects, either positive or negative, have been identified for this SA objective.

SA objective 8: Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage

- 9.22 The location of minerals sites could affect people's enjoyment of recreational facilities such as nearby open space, Public Rights of Way (PRoWs) and recreation facilities.
- 9.23 Twenty-five (68%) of the 37 minerals site options could have a significant negative effect on this SA objective (as part of a mixed effect overall) as they include a leisure or recreational facility or open space. Development of these sites would therefore either mean removing part of a facility/open space, or removing or temporarily closing land which has potential for recreation/access to the countryside. The location of those sites is shown in **Map M3** and it can be seen that while some of the sites are close to the edges of the main urban settlements of Huddersfield and Dewsbury, most of the sites with minor negative effects are in more rural locations in the south of the District.
- 9.24 A further 10 of the site options are likely to have a minor negative effect on this SA objective (again, as part of a mixed effect overall) as they are within 250m of a leisure or recreational facility or open space (but do not include such facilities within their boundaries), and so could make those facilities or the general countryside less attractive for users and impact on amenity.
- 9.25 The remaining two sites are more than 250m from a leisure or recreational facility or open space, and so would have a negligible effect in relation to access to existing recreation facilities.
- 9.26 In all cases, the above effects (negligible, minor negative and significant negative) are part of a mixed effect overall as all of the 37 mineral site options could also have a minor positive effect in the long term if the eventual restoration of the sites provides recreation opportunities. This is increasingly the case, with innovative restoration proposals coming forward on mineral sites around the country. However, the potential minor positive part of the mixed effects is uncertain as this is very dependent on the exact nature and proposed design of the restoration of the minerals site, which would not be known until the planning application stage.

SA objective 9: Ensure all people are able to live in a decent home which meets their needs

9.27 Allocating minerals sites would help to secure the supply of aggregates required to support housing development in the District and elsewhere; however this would not be influenced by the location of minerals sites. Therefore, all of the 37 sites are expected to have a negligible effect on this SA objective. No likely significant effects, positive or negative, were identified for any of the minerals site options in relation to this SA objective.

SA objective 10: Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport

- 9.28 Employees at minerals sites are unlikely to be able to use sustainable transport to travel to work due to the predominantly rural location of most mineral sites. Proximity to rail lines/depots/sidings, rivers/canals or wharves could provide opportunities to explore more sustainable modes of transporting aggregates although effects are uncertain depending on whether there are wharves or depots that could be used.
- 9.29 Six of the minerals site options could have a minor positive effect on this SA objective as they are within 1km of a railway or canal. The locations of those sites are shown in **Map M4** and it can be seen that they are all in the east and south of the District near to rail lines between Huddersfield and Penistone, and Denby Dale and Clayton West.
- 9.30 The remaining 31 sites are more than 1km from a railway or canal and so would have a negligible effect on this SA objective. No likely significant effects, positive or negative, were identified for any of the minerals site options in relation to this SA objective.

SA objective 11: Secure the efficient and prudent use of land

- 9.31 Where minerals-related development takes place on high quality agricultural land it is a less efficient use of land than development on lower quality agricultural land. However, the NPPF states that local planning authorities should put in place policies to ensure that high quality restoration and aftercare of mineral sites takes place, including for agriculture (safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources). In some instances, depending on the proposed restoration process agreed for sites, soils could be reused during restoration.
- 9.32 Four (11%) of the minerals sites are on Grade 3 agricultural land and so would have a significant negative effect. The locations of those sites are shown in **Map M5** and it can be seen that three of these sites are in the east and south east, and one is right on the border of the District north of Huddersfield.
- 9.33 The remaining 33 minerals sites are likely to have a minor negative effect as they are on Grade 4 or 5 agricultural land.

SA objective 12: Protect and enhance the character of Kirklees and the quality of the landscape and townscape

- 9.34 A small area in the south of Kirklees lies within the Peak District National Park. Minerals-related development within that part of the District could have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known. None of the minerals sites are within 500m of the National Park, therefore, no significant negative effects on the landscape have been identified.
- 9.35 Outside of designated areas, areas of high landscape quality and the setting of settlements may be affected by the development of minerals sites. In addition, areas with poor landscape character could be enhanced in the longer-term through the creation of high quality restored minerals sites. However, this will not be able to be determined until the planning application stage, and will depend upon factors such as: how prominent sites are in the landscape; the level of screening; and the character of the surrounding landscape.

9.36 Therefore, the potential for a minor negative effect on the landscape is identified for all 37 minerals sites although this is currently uncertain.

SA objective 13: Conserve and enhance the historic environment, heritage assets and their settings

- 9.37 Judgements about the likely effects of the minerals site options on the historic environment are based on information provided by Historic England (formerly English Heritage). Each site has been rated by Historic England as either red, orange, yellow or green based on the likely effects on the historic environment of developing the site in question and those judgements converted to SA scores.
- 9.38 None of the mineral sites were rated by Historic England as 'red', i.e. the development of the site is likely to result in substantial harm to a designated heritage asset, and as such none of the mineral sites would have a significant negative effect.
- 9.39 Similarly none of the mineral sites were classed as 'yellow' by Historic England, meaning that the allocation of the site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment. Therefore, none of the mineral sites would have a potential minor negative effect either.
- 9.40 Six mineral site options were identified as 'orange' as their likely effects on the historic environment are uncertain. Effects on cultural heritage assets are uncertain as the potential for effects will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect). The locations of those sites are shown in **Map M6** and it can be seen that these are all in the south east of the District near Skelmanthorpe, Denby Dale and Cawthorne.
- 9.41 Most (31 out of 37) of the mineral site options were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those sites are therefore most likely to have a negligible effect on this SA objective although this is again uncertain.
- 9.42 No likely positive effects (minor or significant) were identified in relation to any of the mineral site options.

SA objective 14: Maximise opportunities to protect and enhance biodiversity and geodiversity

- 9.43 Minerals sites that are within close proximity of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, trampling etc. However, the potential for negative effects is uncertain and will depend on the incorporation of mitigation.
- 9.44 In addition, the design of and restoration of mineral sites is increasingly adopting innovative practice to contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. There may be opportunities for sites to contribute towards national and local biodiversity targets during the restoration stage of the site, supporting ecological networks surrounding the site and incorporating the use of native species and habitats to encourage biodiversity within the site. However, this would be very dependent on the exact nature and proposed design of the planned mineral site, which would not be known until the planning application stage.
- 9.45 In addition to potential effects on nearby designated sites, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment (as site surveys are not undertaken). This would need to be determined once more specific proposals are developed and submitted as part of a planning application. Distances of 250m and 1km have been used as an indication of proximity, as there are no standard distance thresholds available and it is recognised

- that the distance over which effects may occur vary between habitats and species and the types of effect being considered. This level of detail is not possible to be determined as part of the SA.
- 9.46 Eight (22%) of the 37 minerals site options were identified as having a potentially significant negative effect on this SA objective as they are within 250m of one or more designated biodiversity or geodiversity sites. The locations of those site options are mapped in **Map M7**, which shows that these sites are to the south west of Huddersfield and around in the south east of the District near Skelmanthorpe, Denby Dale and Cawthorne, where there are a number of approved and candidate Local Wildlife Sites.
- 9.47 A further 28 (77%) minerals site options were found to have a potential minor negative effect as they are between 250m and 1km from a designated biodiversity or geodiversity site. Only one site was likely to have a negligible effect as it is more than 1km from a biodiversity or geodiversity site.
- 9.48 In all cases, the potential effects (negligible, minor negative and significant negative) are mixed with a potential minor positive effect, due to the potential to achieve biodiversity or geodiversity gains in the long term through restoration. All effects are also uncertain until the design and layout of the sites are known, as there may be opportunities to incorporate biodiversity enhancements.

SA objective 15: Reduce air, water and soil pollution

- 9.49 The location of minerals sites would not have a direct effect on soil quality (soil loss is addressed under SA objective 11 above).
- 9.50 Mineral sites that are in Source Protection Zone (SPZ) 1 or adjacent to a water body could potentially lead to loss of contaminants or accidental pollution incidents, and may affect water flows. Twenty (54%) of the 37 minerals site options could have a minor negative effect on this SA objective because they either contain or are adjacent to one or more water bodies such as rivers, ponds and lakes and therefore have the potential to have a minor negative effect. However, this effect is uncertain as it would be very dependent on the exact nature, working and proposed design of the site. One of the mineral site options (ME2244: Sovereign Quarry, Shepley) would also have an uncertain minor negative effect because it is within Source Protection Zone 1. The locations of these site options are mapped in **Map M8**, and are generally in the east and south of the District near to the Rivers Calder, Dearne and the Park Gate Dike, and to the south west of Huddersfield near to the River Colne.
- 9.51 Minerals development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic (particularly HGV movements) in those areas could compound existing air quality problems. However, none of the mineral site options are within or directly adjacent to an AQMA and therefore all 37 of the mineral site options will have a negligible effect in terms of air pollution.
 - SA objective 16: Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people
- 9.52 National Planning Practice Guidance identifies minerals working and processing (except sand & gravel working) as 'less vulnerable' uses, which means that they are potentially compatible with all flood zones except for Flood Zone 3b, the functional floodplain. Sand and gravel workings are classed as water-compatible development and are potentially suitable for all flood zones including 3b, the functional floodplain.
- 9.53 Some minerals sites, which may dewater, may hold the potential to store excess water in times of heavy rain, which would be seen as a positive in terms of preventing flood risk. However, this would not be known until the planning application stage.
- 9.54 Thirty-four of the minerals site options are outside of flood zone 3b and the remaining three sites within flood zone 3b are proposed for sand and gravel extraction, so all the mineral site options will have a negligible effect on this SA objective. No likely significant effects, either positive or negative, were identified.

SA objective 17: Increase prevention, re-use, recovery and recycling of waste close to source

9.55 The location of minerals sites would not have a direct effect on waste and all of the 37 site options would therefore have a negligible effect. No likely significant effects, either positive or negative, have been identified for this SA objective.

SA objective 18: Increase efficiency in water energy and raw material use

- 9.56 While all new development will inevitably involve an increase in energy and water consumption this will not be influenced by the location of minerals sites.
- 9.57 The effects of minerals sites on the efficient use of raw materials will depend on the nature of the minerals-related activities, i.e. if they involve processing recycled aggregates. However, this will again not be influenced by the location of sites and all of the site options would have a negligible effect on this objective.
- 9.58 No likely significant effects, either positive or negative, have been identified for this SA objective.

SA objective 19: Reduce the contribution that the District makes to climate change

9.59 The location of minerals sites would not have a direct effect on the contribution that Kirklees makes to climate change and all of the 37 site options would therefore have a negligible effect.

No likely significant effects, either positive or negative, have been identified for this SA objective.

Summary of SA findings for the minerals site options

- 9.60 **Table 9.1** overleaf shows the SA scores for all of the 37 minerals site options. Significant negative effects have only been identified in relation to:
 - Recreational assets (SA objective 8) Twenty-five (68%) of the 37 minerals site options could have a significant negative effect on this SA objective (as part of a mixed effect overall) as they include a leisure or recreational facility or open space.
 - Efficient use of land (SA objective 11) Four (11%) of the 37 site options could have a significant negative effect as they are on Grade 3 best and most versatile agricultural land.
 - Biodiversity and geodiversity (SA objective 14) Eight (22%) of the 37 minerals site options were identified as having a potentially significant negative effect on this SA objective as they are within 250m of one or more designated biodiversity or geodiversity sites.

Table 9.1: SA scores for all 37 minerals site options

Table 9.	1: SA	scor	es to	r all .	3 / MI	nera	IS SIT	е орті		obje	ctives								
									<u> </u>			,		_					
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
ME1965	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME1966	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1968	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	?/+?	0	0	0	0	0
ME1970	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1971	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1972	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1973	+	+	0	0	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME1975	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2240	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2241	+	+	0	0	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2242	+	+	0	0	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2243	+	+	0	-?	-?	0	0	0/+?	0	0		-?	0?	-?/+?	0	0	0	0	0
ME2244	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2245	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2246	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2247	+	+	0	-?	-?	0	0	-/+?	0	+?	-	-?	0?	?/+?		0	0	0	0
ME2248	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	?/+?		0	0	0	0
ME2249	+	+	0	-?	-?	0	0	/+?	0	0		-?	0?	?/+?		0	0	0	0
ME2250	+	+	0	-?	-?	0	0	/+?	0	+?		-?	0?	-?/+?	-?/0	0	0	0	0
ME2251	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	?/+?		0	0	0	0
ME2252	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	-?/0	0	0	0	0
ME2253	+	+	0	-?	-?	0	0	-/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2254	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2255	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2256	+	+	0	-?	-?	0	0	/+?	0	0		-?	0?	-?/+?	0	0	0	0	0
ME2257	+	+	0	0	-?	0		/+?		0		-?		-?/+?		0	0	0	0
ME2258	+	+	0	-?	-?	0		/+?		0		-?	0?	-?/+?		0	0	0	0
ME2259	+	+	0	0	-?	0	0	-/+?	0	+?		-?	?	0/+?	-?/0	0	0	0	0
ME2260	+	+	0	-?	-?	0		/+?		+?		-?	0?	-?/+?		0	0	0	0
ME2263	+	+	0	-?	-?	0	0	0/+?	0	0	-	-?	0?	-?/+?		0	0	0	0
ME2264	+	+	0	0	-?	0	0	/+?	0	0	-	-?	0?	-?/+?	0	0	0	0	0
ME2265	+	+	0	-?	-?	0	0	/+?	0	0		-?	0?	-?/+?		0	0	0	0
ME2267	+	+	0	0	-?	0		/+?	0	0	-	-?	?	?/+?		0	0	0	0
ME2312	+	+	0	-?	-?	0		-/+?	0	+?		-?	?	?/+?		0	0	0	0
ME2313	+	+	0	-: -?	-: -?	0		-/+?	0	0		-: -?	?	?/+?		0	0	0	0
ME2314	+	+	0	-: -?	-: -?	0		-/+?		+?	-	-: -?	?	-?/+?		0	0	0	0
ME2315	+	+	0	-?	-?	0		/+?		0	-	-?	?	-?/+?		0	0	0	0
			J			-	J		-	-					., 5	J			-

10 Waste site option

- Only one reasonable waste site option has been identified by Kirklees Council and it has been subject to SA in line with the assumptions set out in **Appendix 4** (see Table A4.7). The waste site option is site W1 at Emerald Street, Huddersfield and it is an existing site although there is potential for the site to be redeveloped within the Draft Local Plan period to utilise further land to the east of the existing building.
- 10.2 The SA scores for the waste site option are shown in **Table 10.1** below and the detailed SA matrix is available in the separate **Annex 6**. The location of the site is shown in **Map W1**, also in **Annex 6**.

Table 10.1: SA Scores for the Waste Site Option

										SA o	bjecti	ves							
Site optior	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
W1	+	+	0	-?	-	0	0	-	0	+?	-	-	0?	?	-	0	0	0	+

10.3 One potential significant negative effect has been identified in relation to the waste site expansion option, on SA objective 14: biodiversity. This is because the site is within 250m of a number of designated biodiversity sites; however effects may be able to be mitigated through design and the implementation of other policies in the Local Plan. There may be minor positive effects on SA objectives 1: employment, 2: economic growth, 10: sustainable transport and 19: climate change because the site is within walking distance of bus stops which may enable people to travel to work at the site without using a car, and because the site is currently used for an Energy from Waste Facility. Potential minor negative effects are identified in relation to SA objectives 4: health, 5: amenity, 8: recreation and 15: pollution due to the proximity of the site to sensitive receptors and in relation to SA objectives 11: efficient use of land and 12: landscape because the site is partly on greenfield land.

11 SA Findings for the Policy Options

- 11.1 This section summarises the SA findings for the policy options that have been considered for the Kirklees Local Plan. The section is structured in line with the chapters of the Draft Local Plan (November 2015).
- 11.2 As described in **Chapter 2** the alternative options for Local Plan policies were identified by the Council with input from LUC and have drawn from the most up-to-date evidence as well as guidance in national policy.
- 11.3 Detailed SA matrices for the draft policies (as set out in the Draft Local Plan, November 2015) and the reasonable alternatives considered can be found in **Annex 7**.
- In a number of cases, a reasonable alternative option to a policy in the Draft Local Plan would be to not include a policy addressing the particular issue and instead rely on the NPPF and National Planning Practice Guidance as well as any other relevant policies in the Local Plan (which have been subject to SA separately). For these 'no policy' options, although there would not be a locally specific policy in the Plan relating to the issue in question, other relevant national and local policy would still apply. However, it is not the place of this SA to appraise the likely effects of national planning policy guidance. Therefore, the approach to the 'no policy' option in most cases has generally been to identify likely negligible effects, because the effects of the policy approach in the NPPF have not been appraised. However, in some cases positive or negative effects have been identified in relation to the 'no policy' option as each policy and alternative option has been appraised on its own merits. In other cases, the reasonable alternative policy options would involve setting more detailed criteria, standards or targets addressing a particular issue.

Vision and Strategic Objectives

- 11.5 The Council has produced an overall vision and 10 strategic objectives for the new Local Plan, drawing from the vision and strategic objectives that were included in the now-withdrawn Core Strategy. The vision and strategic objectives for the new Local Plan were originally presented in the engagement document that was consulted on in late 2014, entitled 'Shaping our Local Plan' and were subject to SA in the SA Scoping Report (March 2015).
- 11.6 Since that time, a small number of changes have been made to the vision. The strategic objectives are unchanged from those that were published in 2014. The vision and strategic objectives are now presented in Section 3 of the Draft Local Plan (November 2015) and the SA findings are presented below. The SA findings for the vision have been updated since they were presented in the SA Scoping Report, to reflect the changes made to the vision since then.

Vision

- 11.7 The overall vision for Kirklees sets a general aspiration for development in the District to take place in a sustainable way, supported by social, economic and environmental aspirations, which will enable Kirklees to be a great place to live, work and invest. As it is aspirational, the Local Plan Vision is likely to have a positive effect on all of the SA objectives as shown in **Table 11.1** below.
- 11.8 Social aspirations set out in the vision include the provision of affordable homes and jobs, improvements to people's health and safety and the development of community facilities including public transport and green infrastructure. Therefore, the vision is likely to have positive effects on SA objectives relating to employment (SA objective 1), health (4), amenity (5), access to services (6), crime (7), recreation (8), housing (9) and transport (10).

- 11.9 Economic aspirations within the vision include the promotion of inward investment, stimulation of economic growth and town centre regeneration, and the vision is therefore likely to have positive effects on the SA objectives relating to economic growth (2) and education (3).
- 11.10 A wide range of environmental aspirations are also set out in the vision; therefore it is likely to have positive effects on SA objectives relating to the efficient use of land (11), enhancement of local character (12), protection and enhancement of environmental assets including the historic and natural environment (13 and 14), pollution (15), flooding (16), waste (17), the use of natural resources (18) and climate change (19).
- 11.11 The vision is unlikely to have any significant effects on the SA objectives as it sets out high level aspirations and the success of the vision in helping to achieve the SA objectives will depend on the more detailed policies included in the Draft Local Plan. Those policies have been appraised separately for their likely effects on the SA objectives, and the findings are described below.

Strategic Objectives

- 11.12 The Draft Local Plan strategic objectives are generally unlikely to have an effect on, or are compatible with, the SA objectives (as shown in **Table 11.1**). They are likely to have a number of minor positive effects on the SA objectives including in relation to employment (1), economic growth (2), education (3), health (4), amenity (5) access to services (6), transport (10), the historic environment (13), the natural environment (14), waste (17), natural resources (18) and climate change (19).
- 11.13 Some of the Local Plan objectives are likely to lead to significant positive effects, where they directly address SA objectives. This is the case for:
 - Local Plan objective 1 in relation to economic growth (SA objective 2).
 - Local Plan objective 3 in relation to transport (SA objective 10).
 - Local Plan objective 4 in relation to housing (SA objective 9).
 - Local Plan objective 5 in relation to crime (SA objective 7).
 - Local Plan objective 6 in relation to recreation (SA objective 8) and the natural environment (SA objective 14).
 - Local Plan objective 7 in relation to pollution (SA objective 15) and climate change (SA objective 19).
 - Local Plan objective 8 in relation to local character (SA objective 12), the historic environment (SA objective 13) and the natural environment (SA objective 14).
 - Local Plan objective 9 in relation to the efficient use of land (SA objective 11).
 - Local Plan objective 10 in relation to waste (SA objective 17) and natural resources (SA objective 18).
- 11.14 In addition, some of the Local Plan objectives are likely to lead to uncertain effects depending on how these objectives are implemented. This is the case for Local Plan objectives 1, 3 and 4 in relation to local character (SA objective 12) and the historic environment (SA objective 13).
- 11.15 As with the vision, the success of the Local Plan objectives in helping to achieve the SA objectives will depend on the implementation of more detailed policies within the Local Plan. Those policies will be subject to SA during their development, and the findings for the Draft Local Plan policies are described in this chapter.

Table 11.1: Summary of SA Scores for the Draft Local Plan Vision and Strategic Objectives

								;	SA Obj	jective	es								
	1: Employment	2: Economic Growth	3: Education	4: Health	5: Amenity	6: Access to Services	7: Crime	8: Recreation	9: Housing	10: Transport	11: Use of Land	12: Local Character	13: Historic Environment	14: Biodiversity	15: Pollution	16: Flooding	17: Waste	18: Natural Resources	19: Climate Change
Local Plan Vision	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Local Plan Objective 1: Economic growth and diversification	+	++	+	+	0	+	+?	+	+	+	0	?	?	0	0	0	0	0	0
Local Plan Objective 2: Vitality and viability of town centres	+	+	+?	+?	0	+?	+?	+?	+?	+	0	+	+	0	0	0	0	0	0
Local Plan Objective 3: Transport links	0	+?	+?	+	0	+	0	0	0	++	0	?	?	0	+	0	0	0	+?
Local Plan Objective 4: Housing	0	+?	+	+	0	+	0	0	++	0	0	?	?	0	0	0	0	0	0
Local Plan Objective 5: Social inequalities	+	0	+	+	+	+	++	+	0	0	0	0	0	0	0	0	0	0	0
Local Plan Objective 6: Green infrastructure	0	+	0	+	+	+	0	++	0	0	+	+?	+	++	+	0	0	0	+?
Local Plan Objective 7: Climate Change	0	0	0	0	0	0	0	0	0	0	+	0	0	0	++	+	+	+	++
Local Plan Objective 8: Built, natural and historical environment	0	+	0	0	0	0	0	+	0	+	+	++	++	++	0	0	0	0	0
Local Plan Objective 9: Use of brownfield land	+?	+	0	0	0	0	0	0	0	0	++	+	0	0	0	+	0	0	0
Local Plan Objective 10: Sustainable use of minerals and waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	+

Delivering Growth and Sustainable Development

11.16 This section relates to the Draft Policies and alternative options presented in Chapter 4 of the Draft Local Plan (November 2015): Delivering Growth and Sustainable Development.

Spatial development strategy

- 11.17 A spatial framework needs to be included in the Local Plan in order to guide development to the most appropriate locations. Three options for the spatial framework for the new Local Plan were presented in the 'Shaping our Local Plan' engagement document in late 2014, and were subject to SA during the preparation of the SA Scoping Report (March 2015) with the findings described in Chapter 6 of that document. These options are now also presented in the Draft Local Plan, with one having been taken forward and developed into the more detailed Spatial Development Strategy for the Local Plan. The two reasonable alternative options (RAs) to the Spatial Development Strategy as set out in the Draft Local Plan are:
 - RA1: Allocating development based on the size of settlements.
 - RA2: Allocating development based on an area's character, its constraints and opportunities.
- 11.18 The SA scores for the Spatial Development Strategy as presented in the Draft Local Plan and the two alternative options are shown in **Table 11.2** further ahead in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Delivering Growth and Sustainable Development chapter of the Draft Local Plan.
 - Reasons for selecting the Spatial Development Strategy as drafted
- 11.19 The spatial development strategy in the Local Plan represents a balance between the advantages of focussing most development in the largest settlements and the need to ensure that it is located in the most appropriate locations that are most able to accommodate growth, taking into account factors other than settlement size.
- 11.20 The SA findings support the approach that has been taken to the spatial development strategy in the Local Plan. While RA1 (allocating development based on the size of settlements) would have a higher number of positive effects, there are also a number of negative effects associated with that option which would not occur under the spatial development strategy as set out in the Draft Local Plan.

Achieving sustainable development

- 11.21 Draft policy DLP1: Presumption in Favour of Sustainable Development is the model policy from the National Planning Policy Framework that has to be included in all Local Plans; therefore no reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.22 The SA scores for DLP1 are shown in **Table 11.2** further ahead in this section and the SA findings are summarised below the table along with the SA findings for the other draft policies in the Delivering Growth and Sustainable Development chapter of the Draft Local Plan.

Location of new development

- 11.23 Draft policy DLP2: Location of New Development sets out the broad spatial framework that will apply to new development, in order to deliver the spatial development strategy. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.24 The SA scores for DLP2 are shown in **Table 11.2** further ahead in this section and the SA findings are summarised below the table along with the SA findings for the other draft policies in the Delivering Growth and Sustainable Development chapter of the Draft Local Plan.

Infrastructure planning

11.25 Draft policy DLP3: Providing Infrastructure sets out the Council's approach to providing the infrastructure required to support new development in Kirklees, and requires the necessary

infrastructure to be in place ahead of the development that it would support. Two reasonable alternative options were identified in relation to this policy:

- RA1: Do nothing.
- RA2: To include more prescriptive requirements and standards within the policy.
- 11.26 The SA scores for DLP3 and the two reasonable alternative options are shown in **Table 11.2** further ahead in this section and the SA findings for DLP3 are summarised below the table along with the SA findings for the other draft policies in the Delivering Growth and Sustainable Development chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.27 The Council has taken forward DLP3 instead of the reasonable alternative options considered because RA1 (do nothing) would mean that there is more risk that the infrastructure improvements required to support new development are not delivered, which could result in existing infrastructure becoming overloaded. RA2 would involve setting out more prescriptive standards within the policy in relation to infrastructure provision, which would potentially result in duplication with other Local Plan policies addressing issues such as education and healthcare facilities, water treatment and the transport network.
- 11.28 The SA findings support this approach, being more positive for the draft policy than for either of the reasonable alternative options. DLP3 would have significant positive effects on a number of the SA objectives including 1: employment, 2: economy, 3: education, 4: health, 6: access to services, 8: recreation, 10: sustainable transport, 15: air pollution and 16: flooding. This is because the policy would ensure that infrastructure is provided to support residential and commercial developments, thereby avoiding existing infrastructure becoming overloaded. RA1 could result in the infrastructure required to support development not being delivered so could have negative effects on these SA objectives. Under RA2, provision is made for the delivery of infrastructure; however the standards to be specified may become inappropriate over time as a result of changing circumstances which could result in inappropriate levels of infrastructure provision. Therefore, largely mixed (minor positive and minor negative) effects are likely in relation to that option.

Masterplanning sites

- 11.29 Draft policy DLP4: Masterplanning Sites sets out the aims that masterplans for developments will be expected to achieve. One reasonable alternative to this draft policy was identified:
 - RA1: Do nothing and rely on the NPPF.
- 11.30 The SA scores for DLP4 and the reasonable alternative option are shown in **Table 11.2** further ahead in this section and the SA findings for DLP4 are summarised below the table along with the SA findings for the other draft policies in the Delivering Growth and Sustainable Development chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.31 The Council has taken forward DLP4 instead of the reasonable alternative option considered because RA1 would mean that detailed guidance for developers would not be provided with regards to the Council's expectations and because there would be a lack of clarity, with opportunities to promote sustainable development being missed.
- 11.32 The SA findings support this approach, being more positive for DLP4 than for the alternative option. DLP4 would have positive effects on many of the SA objectives because of the wide range of criteria included in the draft policy. Significant positive effects are identified for the following SA objectives because they are directly addressed by the policy criteria: SA objectives 9: housing, 10: sustainable transport, 12: landscape, 13: historic environment, 14: biodiversity and 19: climate change. In contrast, RA1 would have negligible effects on all 19 SA objectives. While not having the policy would not result in negative effects because other national and local planning policy would still apply to developments, opportunities to promote sustainable development through a specific policy addressing requirements for masterplans would be lost.

Safeguarded land

- 11.33 Draft policy DLP5: Safeguarded Land would safeguard land for residential and employment development over the long-term and would restrict most development proposals in those areas. One reasonable alternative to this draft policy was identified:
 - RA1: Allow flexibility within the Local Plan by allowing some safeguarded land to be brought forward during the Plan period as a contingency.
- 11.34 The SA scores for DLP5 and the reasonable alternative option are shown in **Table 11.2** further ahead in this section and the SA findings for DLP5 are summarised below the table along with the SA findings for the other draft policies in the Delivering Growth and Sustainable Development chapter of the Draft Local Plan. The safeguarded sites were subject to SA as reasonable options for residential site allocations and the findings can be found in **Annex 1**.

Reasons for selecting the Draft Policy

- 11.35 The Council has taken forward DLP5 instead of the reasonable alternative option considered because RA1 could potentially undermine the delivery of allocated sites and lead to overdevelopment in certain areas.
- 11.36 The SA findings support this approach, being more positive for DLP5. DLP5 is likely to have significant positive effects on SA objectives 1: employment, 2: economy and 9: housing because safequarding land for potential future housing and employment development beyond the Local Plan period would help to ensure the long-term availability of land to meet housing and employment needs. Under RA1, if development does not come forward on the sites that are allocated for housing and employment development in the Local Plan, there would be some flexibility to bring forward housing or employment development on the safeguarded sites within the Plan period. While this could have a significant positive effect on SA objectives 1: employment, 2: economy and 9: housing in relation to ensuring the delivery of housing and employment development, it may also mean that development does not take place in the most appropriate and accessible areas, as the most appropriate sites will be the ones that are allocated in the Local Plan due to the detailed assessment process they have been through. Therefore, RA1 could have minor negative effects on several of the other SA objectives including SA objectives 3: education, 4: health, 5: amenity, 6: access to services, 8: recreation, 10: sustainable transport, 11: efficient land use, 12: landscape, 13: historic environment, 14: biodiversity, 15: pollution, 16: flood risk, 17: waste and 19: climate change.

Efficient and effective use of land and buildings

- 11.37 DLP6: Efficient and Effective Use of Land and Buildings sets out criteria that will apply to development proposals to ensure the best use of land and buildings. Four reasonable alternatives to this draft policy were identified:
 - RA1: Do nothing and rely on the NPPF.
 - RA2: Set a higher housing density level.
 - RA3: Set a lower housing density level.
 - RA4: Set a minimum target for the amount of development that takes place on brownfield land.
- 11.38 The SA scores for DLP6 and the reasonable alternative options are shown in **Table 11.2** further ahead in this section and the SA findings for DLP6 are summarised below the table along with the SA findings for the other draft policies in the Delivering Growth and Sustainable Development chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

11.39 The Council has taken forward DLP6 instead of the reasonable alternative options considered because RA1 (rely on national policy) would not provide enough detail to enable the assessment of planning applications and RA4 (set a target for development on brownfield land) would not be effective because there have been relatively few brownfield development site options available in Kirklees. The housing density level taken forward in DLP6 is considered to represent an appropriate balance between past delivery rates and the need to make efficient use of land and

- buildings; therefore RA2 and RA3 which would involve setting a higher or lower density level have been rejected as inappropriate.
- 11.40 The SA findings support this approach, being more positive for DLP6 than for the reasonable alternative options. DLP6 would have a significant positive effect on SA objective 9: housing because it permits lower housing densities than the usual level if the viability of the development would be compromised or in order to provide particular types of housing. It also supports bringing empty properties back into reuse. The measures in the policy seeking to steer development to brownfield sites would also result in significant positive effects on SA objectives 11: efficient land use and 12: landscape. RA1 (do nothing and rely on the NPPF) would mean that there is less policy support in the Local Plan in relation to prioritising the reuse of brownfield land; however the NPPF would still apply which includes very similar wording to DLP6. Therefore that option would still have some minor positive effects on the SA objectives although there is less certainty without the additional detail in DLP6. RA2 would involve setting a higher density target and, depending on how high the density is, the quality of developments may be compromised. Therefore, potential minor negative effects were identified in relation to SA objectives 9: housing 12: landscape (in the case of SA objective 9, this is part of a mixed effect overall as this approach would allow for the delivery of a higher number of units within sites). Conversely, RA3 would involve setting a lower density target which could result in the delivery of fewer homes, but the quality of the homes is less likely to be compromised. RA4 would involve setting a minimum target for the amount of housing to take place on brownfield land, which would have a significant positive effect on SA objective 11: efficient land use although this is uncertain because such a target may not be achievable, as described above.

Table 11.2: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Delivering Growth and Sustainable Development

11.41 The SA scores for the Spatial Development Strategy and the draft policies (DLP1-6) are shown in **bold**.

SA objectives	Development Strategy	RA1	RA2	DLP1	DLP2	DLP3	RA1	RA2	DLP4	RA1	DLP5	RA1	DLP6	RA1	RA2	RA3	RA4
1: Employment	+?	+	?	+	++?	++	+/-	+/-	+	0	++?	/+	0	0	0	0	0
2: Economic Growth	0	0	0	+	+	++	+/-	+/-	+	0	++?	/+	0	0	0	0	0
3: Education	?	+?	?	+	+	++	-?	+/-	+	0	0	-?	0	0	0	0	0
4: Health	?	+?	?	+	+	++	-?	+/-	+	0	0	-?	0	0	0	0	0
5: Amenity	?	-?	?	+	+/-	0	0	0	0	0	0	-?	0	0	0	0	0
6: Access to Services	?	+	-?	+	+	++	-?	+/-	+	0	0	-?	0	0	0	0	0
7: Crime	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
8: Recreation	?	+	?	+	+	++	-?	+/-	+	0	0	-?	0	0	0	0	0
9: Housing	0	0	0	+	++	0	+	?	++	0	++?	/+	++	+?	+/-?	+/-?	0
10: Transport	+?	+	+/-?	+	++	++	-?	+/-	++	0	0	-?	+	0	0	0	0
11: Use of Land	+?	+?	?	+	+	0	0	0	0	0	0	-?	++	+?	++?	+?	++?
12: Local Character	+?	-?	++?	+	+	0	0	0	++	0	0	-?	++	+?	-?	+?	++?
13: Historic Environment	+?	+/-?	+?	+	-?	0	0	0	++	0	0	-?	0	0	0	0	0
14: Biodiversity	+?	+/-?	+?	+	0	0	0	0	++	0	0	-?	+	+?	0	0	+?
15: Pollution	0	0	0	+	+	++	-?	+/-	+	0	0	-?	+	+?	0	0	++?
16: Flooding	+?	+?	+?	+	+?	++	-?	+/-	+	0	0	-?	+	+?	0	0	++?
17: Waste	0	0	0	+	0	0	0	0	0	0	0	-?	+	+?	0	0	++?
18: Natural Resources	0	0	0	+	0	0	0	0	+	0	0	0	+	+?	0	0	++?
19: Climate Change	+?	+	+/-?	+	+	+	-?	+?	++	0	0	-?	+	0	0	0	0

SA findings for the draft policies in Chapter 4 of the Draft Local Plan

- 11.42 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 4 of the Draft Local Plan: Delivering Growth and Sustainable Development.
- 11.43 The spatial development strategy and policies DLP1-6 are likely to have broadly positive effects on the SA objectives because they set out the framework for delivering growth in Kirklees in the most sustainable way possible. A number of likely significant positive effects have been identified in relation to SA objectives 1: **employment** and 9: **housing** because the policies in this chapter set the framework for delivering sustainable development to meet local requirements for jobs and housing. DLP4: Masterplanning sites sets out criteria that will ensure that housing and employment development protects and enhances the local environment, where development sites are masterplanned.
- 11.44 Priority is given to developing brownfield sites through DLP6, which will help to achieve efficient land use (SA objective 11) and reduce the potential impacts of development on the landscape (SA objective 12). Focussing most development in the larger settlements within the District, as set out in the spatial development strategy, will help to ensure that people have good access to education (SA objective 3) and healthcare facilities (SA objective 4), as well as other services and facilities (SA objective 6) and job opportunities (SA objective2).
- 11.45 While directing most development to larger settlements may be more likely to affect the **historic environment** (SA objective 13) as there are generally higher concentrations of listed buildings and other heritage features in the urban areas, this is uncertain and will depend on the specific location and design of developments. All development coming forward will also need to comply with other Local Plan policies, including those that relate to the protection of the historic environment.
- 11.46 While many of the effects of the development strategy are uncertain as they will depend on the specific sites that are allocated for development, site options for residential and employment and other forms of development have been subject to SA separately to consider their likely sustainability effects (these are described in **Chapters 4-10** of this report).
- 11.47 No likely significant negative effects were identified in relation to any of the Draft Local Plan policies in this section.

Place Shaping

11.48 This section relates to the draft policy presented in Chapter 5 of the Draft Local Plan (November 2015): Place Shaping. Only one policy (DLP7) is included in this chapter of the Local Plan.

Place shaping

- 11.49 Draft Policy DLP7: Place Shaping requires developments to build on the identified strengths and opportunities of various sub-areas within Kirklees, and to address the challenges that have been identified as facing those areas. No reasonable alternative options to this policy were identified.
- 11.50 The SA scores for DLP7 are shown in **Table 11.3** below.

Table 11.3: Summary of SA Scores for the Draft Local Plan policy relating to Place Shaping

										SA O	bjecti	ves								
		1: Employment	2: Economic growth	3: Education	4: Health	5: Amenity	6: Access to services	7: Crime	8: Recreation	9: Housing	10: Transport	11: Use of Land	12: Local character	13: Historic environment	14: Biodiversity	15: Pollution	16: Flooding	17: Waste	18: Natural resources	19: Climate change
DLI 7	Р	+	+	+	++	0	+	+	0	+	++	0	++	+?	0	+	0	0	0	+

SA findings for the draft policy in Chapter 5 of the Draft Local Plan

- 11.51 The likely effects of policy DLP7 are broadly very positive as it seeks to ensure that new development is of high quality and directly addresses a number of the issues covered by the SA objectives.
- 11.52 A likely significant positive effect is identified in relation to SA objective 4: **health** because as well as seeking to ensure that services are accessible (taken to include healthcare facilities such as GPs), the policy should encourage and facilitate higher levels of walking and cycling amongst local people. A significant positive effect is also likely in relation to SA objective 10: **sustainable transport** as the policy includes a number of measures aiming to reduce reliance on car use and to provide shared space on streets. These measures will also result in minor positive effects on reducing **air pollution** (SA objective 15) and mitigating **climate change** (SA objective 19).
- 11.53 A likely significant positive effect is also identified in relation to SA objective 12: **landscape** because of the provisions within the policy aiming to ensure that development is well-designed and integrated within the wider built and natural environment.
- 11.54 No likely negative effects, minor or significant, were identified in relation to this policy.

Economy

11.55 This section relates to the draft policies and alternative options described in Chapter 6 of the Draft Local Plan (November 2015): Economy.

Employment provision

- 11.56 The Draft Local Plan makes provision for **32,194 jobs** over the Plan period from 2013-2031, which is the objectively assessed need derived from a number of scenarios based on various employment rates utilising the Regional Econometric Model and an interpretation of the Kirklees Economic Strategy. Two reasonable alternative options were identified in relation to the employment provision figure for Kirklees:
 - RA1: Make provision for the lowest employment growth scenario the Jobs-led A Trend Employment Rate SENS1, which equates to **19,326 jobs** from 2013-2031.
 - RA2: Make provision for the highest employment growth scenario the Jobs-led D 80% Employment Rate, which equates to **43,722 jobs** from 2013-2031.
- 11.57 The SA scores for the employment provision quantum and the two reasonable alternative options are shown in **Table 11.4** further ahead in this section and the SA findings for the Draft Local Plan employment provision are summarised below the table along with the SA findings for the other draft policies in the Economy chapter of the Draft Local Plan.

Reasons for selecting the Draft Local Plan Employment provision figure

11.58 The Council has taken forward the recommended objectively assessed employment need figure based on work it has undertaken to identify a number of scenarios based on various employment

- rates utilising the Regional Econometric Model and an interpretation of the Kirklees Economic Strategy.
- 11.59 The SA findings support this decision, being slightly more positive than the lower employment provision in RA1 and the higher employment provision in RA2. While all three of the options would have significant positive effects on SA objective 2: **economy** due to allowing for employment growth, the employment provision made in the Draft Local Plan could also have a minor positive effect on SA objective 1: **employment** as it is seeking to be in line with the level of housing growth that needs to be provided for. RA1 would provide fewer job opportunities and RA2 is higher and therefore could have a significant positive effect on SA objective 1 (the only objective where RA2 scores better than the Draft Local Plan option). While all three of the employment growth options could have adverse effects on SA objectives 11: **use of land**, 12: **local character**, 13: **historic environment** and 14: **biodiversity**, the Draft Local Plan provision and RA1 are more likely to have minor negative effects than the significant negative effects identified for RA2 due to the higher level of employment land that would be provided.
- 11.60 The employment provision in the Draft Local Plan could have minor positive effects on SA objectives 9: **housing** and 10: **transport** as it is intended to be in line with the level of housing provision selected for the Local Plan, therefore this option is likely to have a positive effect on balancing housing provision and employment opportunities in the District, and thus reduce commuting distances. In contrast, RA1 is not considered likely to have effects on these objectives and RA2 could have a minor negative effect on these two objectives as it makes the highest level of employment provision and more jobs than homes are provided, therefore, more people may be attracted to the District due to job opportunities but not be able to get a home in the District, and in-commuting may increase.
- 11.61 All three options are likely to have the minor negative but uncertain effects on SA objective 5: amenity, because all of the growth options will result in some noise and light pollution but the effects will depend on the location of new employment sites, which have been appraised separately. All three options are also likely to have minor mixed but uncertain effects on SA objectives 15: pollution, 16: flooding and 17: climate change, because provision of new employment could result in increased pressure on air, water and soil resources, as well as increased greenhouse gas emissions and/or flooding, but the extent of effects is dependent on the location of new employment sites as well as the provision of adequate infrastructure to accommodate the new development as well as the incorporation of sustainable design and construction measures that could help to mitigate potential effects. The employment growth options are unlikely to affect the remaining SA objectives because the effects would depend more on the location of the employment land provided rather than the quantum of growth.

Safeguarding employment land and premises

- 11.62 Draft Policy DLP8: Safeguarding Employment Land and Premises provides protection for sites within Priority Employment Areas, preventing their change of use unless specific criteria are met. One reasonable alternative to this draft policy was identified:
 - RA1: Allow a very flexible policy which responds purely to market forces.
- 11.63 The SA scores for DLP8 and the reasonable alternative option are shown in **Table 11.4** further ahead in this section and the SA findings for DLP8 are summarised below the table along with the SA findings for the other draft policies in the Economy chapter of the Draft Local Plan.
 - Reasons for selecting the Draft Policy
- 11.64 The Council has taken forward DLP8 instead of the alternative option considered because RA1 would not allow sufficient control over the protection of employment land and could compromise the supply of land to meet commercial needs.
- 11.65 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP8 would have significant positive effects on SA objectives 1: **employment** and 2: **economy** because it would protect existing employment sites within Priority Employment Areas (PEAs) from change of use unless certain criteria are met. The PEAs have been identified based on factors including their accessibility; therefore protecting employment uses in those areas will also help to ensure that jobs are available in the most accessible locations. This would result in minor positive effects on SA objectives 10: **sustainable transport**, 15: **air pollution** and 19:

climate change. In contrast, RA1 could have a significant negative effect on SA objectives 1 and 2 and minor negative effects on SA objectives 10, 15 and 19 because, although the effects of this approach are somewhat uncertain depending on what market forces demand, there is more chance of employment land in the most accessible locations being lost to other uses. Taking a more flexible approach under RA1 could have minor positive effects on SA objectives 6: services and facilities and 9: housing as it could potentially result in other forms of developments being permitted on existing employment sites in the PEAs, while DLP8 would prevent this. However, overall the sustainability effects of DLP8 are more positive than for RA1.

Supporting skilled communities

- 11.66 DLP9 sets out the Council's strategy for developing skilled communities in order to underpin future economic growth to deliver the Kirklees Economic Strategy. One reasonable alternative to this draft policy was identified:
 - RA1: To not seek any contributions for local employment opportunities, training or skills.
- 11.67 The SA scores for DLP9 and the reasonable alternative option are shown in **Table 11.4** further ahead in this section. The SA findings for DLP9 are summarised below the table along with the SA findings for the other draft policies in the Economy chapter of the Draft Local Plan.
 - Reasons for selecting the Draft Policy
- 11.68 The Council has taken forward DLP9 instead of the reasonable alternative option considered because RA1 would not support the Kirklees Economic Strategy.
- 11.69 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP9 would have significant positive effects on SA objectives 1:

 employment, 2: economy and 3: education because it would require major development proposals to support the education and training of local residents. Over time this would increase the skill level of the population which will support economic growth and open up more job opportunities for local people. The policy also supports development which contributes to the operational needs of the District's higher learning centres this could have minor positive effects on SA objectives 4: health, 6: access to services and 8: recreation if this were to include the development of sports facilities. In contrast, RA1 would have minor negative effects on SA objectives 1: employment, 2: economy and 3: education because it would not provide explicit policy support for the development of skills or for the development of the District's higher learning facilities. This could make it more challenging to meet the aims of the Kirklees Economic Strategy and certain areas of the District could remain deprived in relation to skills and employment.

Supporting the rural economy

- 11.70 DLP10: Supporting the Rural Economy provides support to proposals that would benefit the rural economy, including tourism-related proposals, farm diversification, farm shops, cafes, tea rooms and other appropriate proposals. Two reasonable alternatives to this draft policy were identified:
 - RA1: To have no Local Plan policy and rely on the NPPF.
 - RA2: The policy could be more specific, for example by specifying the types of enterprises that will be considered to be acceptable.
- 11.71 The SA scores for DLP10 and the reasonable alternative options are shown in **Table 11.4** further ahead in this section. The SA findings for DLP10 are summarised below the table along with the SA findings for the other draft policies in the Economy chapter of the Draft Local Plan and the reasonable alternatives considered.
 - Reasons for selecting the Draft Policy
- 11.72 The Council has taken forward DLP10 instead of the reasonable alternative options considered because RA1 would mean that there is a lack of clarity (the NPPF does not provide specific guidance on when economic proposals in rural areas will be appropriate) and because RA2 could be too restrictive, not allowing for the proper consideration of proposals on their own merits.
- 11.73 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP10 would have significant positive effects on SA objectives 1: **employment** and 2: **economy** because it supports appropriate business development in the

countryside and supports live/work units. RA1 would rely on the section of the NPPF which address rural development (paragraph 28). The NPPF is supportive of the rural economy and so a positive effect on these objectives is still likely; however without the locally specific detail in DLP10 the positive effects would be minor and less certain. Although RA2 (include a more specific policy in the Local Plan) would provide locally specific policy support for the rural economy and the associated jobs, it could be too restrictive and not allow for the proper consideration of proposals on their own merits, thereby limiting its effectiveness. A mixed effect is therefore identified for SA objectives 1 and 2.

- 11.74 DLP10 and RA1 could both have a minor positive effect on SA objective 6: **access to services** if they support the development of businesses that can also provide services to local people, such as farm shops, although again this is less certain under RA1. RA2 would have a mixed effect, for the same reasons described above.
- 11.75 DLP10 would also have a minor positive effect on a number of other SA objectives including 12; **local character** because it states that proposals for rural economic development in the green belt must be considered acceptable in relation to green belt policy and have regard to relevant policies in the Local Plan.

Table 11.4: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to the Economy

11.76 The SA scores for the level of employment provision in the Draft Local Plan and the draft policies (DLP8-10) are shown in **bold**.

SA objectives	Employment provision	RA1	RA2	DLP8	RA1	DLP9	RA1	DLP10	RA1	RA2
1: Employment	+	-	++	++	?	++	-?	++	+?	+/-
2: Economic Growth	++	++	++	++	?	++	-?	++	+?	+/-
3: Education	0	0	0	0	0	++	-?	0	0	0
4: Health	0	0	0	0	0	+	0	0	0	0
5: Amenity	-?	-?	-?	0	0	0	0	0	0	0
6: Access to Services	0	0	0	-?	+?	+	0	+?	+?	+/-
7: Crime	0	0	0	0	0	0	0	0	0	0
8: Recreation	0	0	0	0	0	+	0	0	0	0
9: Housing	+?	0	-?	-?	+?	0	0	0	0	0
10: Transport	+?	0	+?	+	-	0	0	+	0	0
11: Use of Land	-?	-?	?	0	0	0	0	+	+	0
12: Local Character	-?	-?	?	0	0	0	0	+	0	0
13: Historic Environment	-?	-?	?	0	0	0	0	0	0	0
14: Biodiversity	-?	-?	?	0	0	0	0	0	0	0
15: Pollution	+/- ?	+/- ?	+/- ?	+	-	0	0	+	0	0
16: Flooding	+/-	+/-	+/- ?	0	0	0	0	+	0	0
17: Waste	0	0	0	0	0	0	0	+	0	0
18: Natural Resources	0	0	0	0	0	0	0	0	0	0
19: Climate Change	+/-	+/-	+/-	+	-	0	0	+	0	0

SA findings for the draft policy in Chapter 6 of the Draft Local Plan

- 11.77 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 6 of the Draft Local Plan: Economy.
- 11.78 Unsurprisingly given their subject matter, the level of employment provision and the draft policies in the Economy chapter of the Local Plan are likely to have significant positive effects on **employment** (SA objective 1) and the **economy** (SA objective 2). Their purpose is to stimulate sustainable economic growth in Kirklees through the provision of accessible employment opportunities in both urban and rural areas; therefore positive effects have also been identified in relation to **sustainable transport** (SA objective 10), **air pollution** (SA objective 15) and **climate change** (SA objective 19).
- 11.79 As described above in relation to DLP8: Safeguarding Employment Land and Premises and the alternative option, while DLP8 could potentially restrict the development of **services** (SA objective 6) and **housing** (SA objective 9), the sustainability benefits of safeguarding employment sites in accessible areas outweigh those potential minor negative effects.
- 11.80 Because of the specific content of these policies, a large number of negligible effects have been identified, particularly in relation to the environmental objectives, although it is acknowledged that the overall level of employment provision may have negative effects depending on where

new employment land is located (options for employment site allocations have been subject to SA separately, as described in **Chapter 5** of this report). No likely significant negative effects were identified in relation to any of the draft policies included in the Economy chapter of the Draft Local Plan.

Homes

11.81 This section relates to the draft policies and alternative options described in Chapter 7 of the Draft Local Plan (November 2015): Homes.

Housing provision

- 11.82 The Draft Local Plan makes provision for **1,630 dwellings per annum** over the Plan period from 2013-2031, which is the recommended objectively assessed need set out in the Strategic Housing Market Assessment (SHMA). Two reasonable alternative options were identified in relation to the housing provision figure for Kirklees:
 - RA1: Make provision for the lowest housing growth scenario from the SHMA the Jobs-led A

 Trend Employment Rate SENS1, which equates to 1,069 dwellings per annum from 2013-2031.
 - RA2: Make provision for the highest housing growth scenario from the SHMA the Jobs-led D 80% Employment Rate, which equates to **2,191 dwellings per annum** from 2013-2031.
- 11.83 The SA scores for the housing provision quantum and the two reasonable alternative options are shown in **Table 11.5** further ahead in this section and the SA findings for the Draft Local Plan housing provision are summarised below the table along with the SA findings for the other draft policies in the Homes section of the Draft Local Plan.
 - Reasons for selecting the Draft Local Plan Housing provision figure
- 11.84 The Council has taken forward the recommended objectively assessed employment need figure based on work it has undertaken to identify a number of scenarios based on demographic information and jobs-led scenarios. The demographic scenarios in the SHMA include scenarios relating to 2010-based and 2012-based national population projections and different migration scenarios. The jobs-led scenarios are based on various employment rates and scenarios utilising the Regional Econometric Model and an interpretation of the Kirklees Economic Strategy.
- 11.85 The SA findings support this decision, as the recommended OAN is likely to have slightly more positive effects than the lower housing provision in RA1 and less negative effects than the higher housing provision in RA2. While all three of the options would have minor positive effects on SA objective 2: **economy** due to stimulating the construction market and providing employment opportunities and investment in the District during construction of additional housing, the housing provision made in the Draft Local Plan could also have a minor positive effect on SA objective 1: **employment** as it is seeking to be in line with the level of employment growth that needs to be provided for. RA1 could result in fewer job opportunities being available to new residents (a minor negative effect) and as RA2 is higher it could have a significant positive effect on SA objective 1 (the only objective where RA2 scores better than the Draft Local Plan option). While all three of the housing growth options could have adverse effects on SA objectives 11: **use of land**, 12: **local character**, 13: **historic environment** and 14: **biodiversity**, the Draft Local Plan provision and RA1 are more likely to have minor negative effects than the significant negative effects identified for RA2 due to the higher level of housing land that would be provided.
- 11.86 The housing provision in the Draft Local Plan and the higher provision under RA2 could have significant positive effects on SA objective 9: **housing** due to the level of housing provided being higher than the minimum that would be required through natural population change, while RA1 could have a minor negative effect as it would be lower. The Draft Local Plan housing provision and RA2 could also have minor positive effects on SA objective 10: **transport** as they are more likely to in line with the level of employment provision selected for the Local Plan, thus could reduce levels of out-commuting and also increase demand for, and therefore viability of, public transport services. In contrast, RA1 is not considered likely to have an effect on this objective.

11.87 All three options are likely to have the minor negative but uncertain effects on SA objective 5: amenity, because all of the growth options will result in some noise and light pollution but the effects will depend on the location of new housing sites, which have been appraised separately. All three options are also likely to have minor mixed but uncertain effects on SA objectives 6: access to services, 8: recreation, 15: pollution, 16: flooding and 17: climate change, because provision of new housing could result in increased pressure on services, recreation facilities air, water and soil resources, as well as increased greenhouse gas emissions and/or flooding, but the extent of effects is dependent on the location of new housing sites as well as the provision of adequate infrastructure and new services and facilities to accommodate the new development as well as the incorporation of sustainable design and construction measures that could help to mitigate potential effects. The housing growth options are unlikely to affect the remaining SA objectives because the effects would depend more on the location of the employment land provided rather than the quantum of growth.

Housing mix and affordability

- 11.88 Draft Policy DLP11: Housing Mix and Affordable Housing sets out the Council's strategy for ensuring that housing developments meet the housing needs of all people and that demand for affordable housing is met. Four reasonable alternative options to this policy were identified:
 - RA1: Require a higher percentage of affordable housing on sites.
 - RA2: Require a lower percentage of affordable housing on sites.
 - RA3: Setting different affordable housing percentage targets for different parts of Kirklees.
 - RA4: Outlining the affordable housing requirement on sites as a percentage of floorspace rather than units.
- 11.89 The SA scores for DLP11 and the reasonable alternative options are shown in **Table 11.5** further ahead in this section and the SA findings for DLP11 are summarised below the table along with the SA findings for the other draft policies in the Homes chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.90 The Council has taken forward DLP11 instead of the alternative options considered because RA1 could make it more difficult for affordable housing to be delivered due to the increased economic burden on developers. RA2 could also result in a lack of affordable housing delivery, and there is not yet enough evidence about the varying affordable housing needs in different parts of Kirklees to take forward RA3. RA4 would be a more complex approach than that set out in DLP11 and could therefore compromise or slow down the delivery of affordable housing in some cases in comparison to DLP11. The SA findings support this decision, being more positive for the draft policy than for the reasonable alternative options.
- 11.91 DLP11 is likely to have a significant positive effect on SA objective 9: **housing** because its purpose is to ensure that affordable housing is provided to meet local needs and requires the provision of a mix of housing. RA1 and RA2 would still require affordable housing to be delivered within housing developments; however a higher requirement (RA1) could make more housing developments unviable and a lower requirement (RA2) could result in less affordable housing coming forward. Both options are therefore likely to have mixed effects on SA objective 9: **housing** and there are some uncertainties attached, as evidence about viability is currently being updated. The effects of RA3 (have varying affordable housing targets for different areas) on SA objective 9: **housing** are uncertain, as the evidence base is not yet available to inform an assessment of what the varying targets could be and how that would relate to levels of need. RA4 (outline affordable housing requirement as a percentage of floorspace) would still deliver affordable housing; however it could be a more complex approach and could compromise or slow down the delivery of affordable housing. A minor rather than significant positive effect is therefore identified in relation to SA objective 9.
- 11.92 A potential significant negative effect has been identified for DLP11 in relation to SA objective 12: landscape because it allows for housing developments in exceptional circumstances to come forward on land which would not normally be permitted for development, as small freestanding settlements. However, the impacts of the alternative options would be the same as this part of the policy would not be affected by a different approach to affordable housing requirements.

Accommodation for Travellers

- 11.93 Draft Policy DLP12: Accommodation for Travellers seeks to meet the accommodation needs of Gypsies and Travellers in Kirklees (site options for potential Traveller site allocations in the Local Plan have been subject to SA separately as described in **Chapter 8** of this report). One reasonable alternative option to this policy was identified:
 - RA1: A detailed criteria-based policy could be used in terms of the selection of sites.
- 11.94 The SA scores for DLP12 and the reasonable alternative option are shown in **Table 11.5** below. The SA findings for DLP12 are summarised below the table along with the SA findings for the other draft policies in the Homes chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.95 The Council has taken forward DLP12 instead of the reasonable alternative option considered because RA1 could be too prescriptive and result in duplication with other Local Plan policies.
- 11.96 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP12 would have a significant positive effect on SA objective 9: housing because it will ensure that sites are available for Travellers. Allocating sites through the Local Plan (which have been subject to SA separately) will help to provide certainty. Under RA1, which would involve including a criteria-based policy in the Local Plan instead of making specific site allocations, there would be less certainty with regards to the delivery of sites to meet local needs and a potential minor negative effect is therefore identified for SA objective 9: housing. The effects of RA1 on the other SA objectives are largely uncertain and would depend on the criteria that are eventually included in a criteria-based policy.

Table 11.5: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Homes

11.97 The SA scores for the level of housing provision and draft policies (DLP11-12) are shown in **bold**.

SA objectives	Housing provision	RA1	RA2	DLP11	RA1	RA2	RA3	RA4	DLP12	RA1
1: Employment	+	-	++	0	0	0	0	0	0	?
2: Economic Growth	+	+	+	0	0	0	0	0	0	0
3: Education	0	0	0	0	0	0	0	0	0	?
4: Health	0	0	0	0	0	0	0	0	0	?
5: Amenity	-?	-?	-?	0	0	0	0	0	0	?
6: Access to Services	+/- ?	+/-?	+/-?	0	0	0	0	0	0	?
7: Crime	0	0	0	0	0	0	0	0	0	0
8: Recreation	+/-	+/-?	+/-?	0	0	0	0	0	0	?
9: Housing	++	-	++	++	+/-?	+/-?	?	+	++	-?
10: Transport	+?	0	+?	0	0	0	0	0	0	?
11: Use of Land	-?	-?	?	0	0	0	0	0	0	?
12: Local Character	-?	-?	?	?	?	?	?	?	0	?
13: Historic Environment	-?	-?	?	0	0	0	0	0	0	?
14: Biodiversity	-?	-?	?	0	0	0	0	0	0	?
15: Pollution	+/- ?	+/-?	+/-?	0	0	0	0	0	0	?
16: Flooding	+/-	+/-?	+/-?	0	0	0	0	0	0	?

SA objectives	Housing provision	RA1	RA2	DLP11	RA1	RA2	RA3	RA4	DLP12	RA1
	?									
17: Waste	0	0	0	0	0	0	0	0	0	?
18: Natural Resources	0	0	0	0	0	0	0	0	0	0
19: Climate Change	+/-	+/-?	+/-?	0	0	0	0	0	O	?

SA findings for the draft policy in Chapter 7 of the Draft Local Plan

- 11.98 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 7 of the Draft Local Plan: Homes. The specific subject matter of the housing policies (i.e. being more about the amount and type of housing rather than the location of new development) means that a large number of negligible effects have been identified for the SA objectives although it is acknowledged that the overall level of housing provision may have negative effects by placing pressure on the environment, services and recreational facilities depending on where new housing land is located (options for residential site allocations have been subject to SA separately, as described in **Chapter 4** of this report).
- 11.99 Both the level of housing provision and draft policies in the Housing section of the Local Plan would have significant positive effects on SA objective 9: **housing** as they seek to ensure that the right amount and type of housing is provided to meet local needs, including affordable housing and Traveller sites. While DLP11 could have a significant negative effect on the **landscape** (SA objective 12) because it permits housing development on sites that would not normally be permitted for housing in certain circumstances, this is uncertain and would depend on location, size and design of the site. In addition, other Local Plan policies relating to design and the protection of the landscape would also still apply, and the same potential significant negative effect was also identified for the alternative options, as described above.

Retailing and Town Centres

11.100 This section relates to the draft policies and alternative options described in Chapter 8 of the Draft Local Plan (November 2015).

Town Centre Uses

- 11.101 Draft Policy DLP13: Town Centre Uses provides information about the types of development that will be appropriate in the town centres in Kirklees. Two reasonable alternative options to this policy were identified:
 - RA1: Do nothing and rely on the NPPF.
 - RA2: A policy could be devised which provides less detail, and makes less reference to key characteristics of the District, such as the differing such a detailed number of centres in the District, and seeks less enhancements to sites located in out of centre locations.
- 11.102 The SA scores for DLP13 and the reasonable alternative option are shown in **Table 11.6** further ahead in this section. The SA findings for DLP13 are summarised below the table along with the SA findings for the other draft policies in the Retailing and Town Centres chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

11.103 The Council has taken forward DLP13 instead of the reasonable alternative options considered because RA1 would not take account of locally specific circumstances and RA2 would remove

- clarity for applicants and would not allow for a clear strategic approach to town centre development across the District to be adopted.
- 11.104 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP13 would maintain the economic health and vitality of the town centres in Kirklees by ensuring that town centre uses are located in defined centres; therefore significant positive effects are likely in relation to SA objectives 2: economy and 6: access to services. Focussing town centre uses in the defined centres would also have positive effects on SA objectives 1: access to jobs, 11: efficient land use, 12: landscape and townscape and 13: cultural heritage as it would help to reduce vacancy rates in town centres and avoid development on greenfield sites outside of the centre. A significant positive effect from DLP13 is also likely in relation to SA objective 10: sustainable transport because as well as focussing town centre uses in defined, accessible areas, the policy encourages proposals to make town centres more attractive to pedestrians and cyclists, and requires proposals in out of centre locations to be accessible by all travel modes. This would also have positive effects on SA objectives 4: health, 15: air pollution and 19: climate change. In contrast, RA1 would have negligible effects on all of the SA objectives because not having a policy in the Local Plan addressing town centre uses would mean that the positive effects associated with DLP13 would not occur; however national policy in the NPPF and other relevant policies in the Local Plan would still apply. Therefore, a negligible rather than negative effect is likely for all of the SA objectives under that option. RA2 would have broadly similar effects to DLP13 because it would still involve including a policy addressing town centre uses in the Local Plan; however having less detail in the policy and relying more on the NPPF would mean that there is less certainty about the positive effects associated with DLP13 occurring.

Shopping frontages

- 11.105 Draft Policy DLP14: Shopping Frontages sets out the Council's approach to primary shopping areas, primary shopping frontages and secondary frontages. Two reasonable alternative options to this policy were identified:
 - RA1: Have no policy in the Local Plan and rely on the NPPF and NPPG.
 - RA2: The policy could be more restrictive in terms of primary and secondary frontages allowing no alternative uses within primary areas and only a limited number in secondary frontages.
- 11.106 The SA scores for DLP14 and the reasonable alternative options are shown in **Table 11.6** further ahead in this section. The SA findings for DLP14 are summarised below the table along with the SA findings for the other draft policies in the Retailing and Town Centres chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.107 The Council has taken forward DLP14 instead of the alternative options because RA1 would not provide strong protection for the retail core of town centres and would be less clear, and RA2 would not allow for the consideration of other factors and could result in high vacancy rates.
- 11.108 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP14 would have significant positive effects on SA objectives 2: economy and 6: access to services because it would maintain the retail function of the shopping areas and avoid high vacancy rates. Focussing retail uses in central locations will also reduce the need to travel by car and have further positive effects on SA objectives 1: access to jobs, 10: sustainable transport, 11: efficient land use, 12: landscape and townscape 15: air quality and 19: climate change. In contrast, RA1 would have negligible effects on all of the SA objectives because not having a policy in the Local Plan addressing shopping frontages would mean that the positive effects associated with DLP14 would not occur; however national policy in the NPPF and other relevant policies in the Local Plan would still apply. RA2 (have a more restrictive policy) would still support the retail economy but could also result in higher vacancy levels if retail units are not viable, which would be detrimental to the wider economy. Mixed (minor positive and minor negative) effects are therefore likely in relation to SA objectives 1: access to jobs and 2: economy. Mixed effects are also likely in relation to SA objectives 11: efficient land use, 12: landscape and townscape, 15: air quality and 19: climate change

because while RA2 would still help to ensure that retail units are focussed in relatively accessible areas, if retail uses are not viable then other facilities may still be restricted from locating there which could result in people travelling longer distances to access those facilities.

Residential in town centres

- 11.109 Draft Policy DLP15: Residential in Town Centres sets out criteria that will apply to proposals for residential uses within town centres. Two reasonable alternative options to this policy were identified:
 - RA1: Have no policy in the Local Plan and rely on the NPPF and NPPG or other Housing policies in the Local Plan.
 - RA2: A policy which sets out less criteria with only limited detail, relying on other policies in the Local Plan and NPPF.
- 11.110 The SA scores for DLP15 and the reasonable alternative options are shown in **Table 11.6** further ahead in this section. The SA findings for DLP15 are summarised below the table along with the SA findings for the other draft policies in the Retailing and Town Centres chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.111 The Council has taken forward DLP15 instead of the alternative options because RA1 could lead to missed opportunities for residential schemes where they would support regeneration and could have adverse impacts on character and amenity. RA2 would not provide clarity for developers.
- 11.112 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP15 provides for residential uses in town centres so would have a minor positive effect on SA objective 9: housing. DLP15 also includes criteria that would apply to such residential developments including in relation to amenity (SA objective 5), local character (SA objective 12), heritage (SA objective 13) and waste (SA objective 17). Further positive effects are likely in relation to other SA objectives because DLP15 would result in housing development in central areas so would provide good access to jobs (SA objective 1) and services and facilities (SA objective 6) via sustainable modes of transport (SA objective 10). RA1 (no policy) would not result in the positive effects associated with DLP15; however other national and local policy would still apply and a negligible rather than negative effect is likely for all of the SA objectives. RA2 (more limited policy) could mean that there is less clarity for developers which could restrict housing delivery in town centres and a minor negative effect is identified for SA objective 9: housing. RA2 would still result in residential development in town centres so is still likely to have benefits in terms of reducing the need to travel and minor positive effects are likely in relation to SA objectives 10: sustainable transport, 15: air quality and 19: climate change. However, for other SA objectives the likely effects are negligible (as for option RA1) because of the lack of detailed criteria addressing various other sustainability issues.

Food and drink uses and the evening economy

- 11.113 Draft Policy DLP16: Food and Drink Uses and the Evening Economy sets out criteria that will apply to proposals for food and drink and licenced entertainment units. Two reasonable alternative options to this policy were identified:
 - RA1: Have no policy in the Local Plan and rely on the NPPF and NPPG or amenity and design policies in the Local Plan.
 - RA2: The policy could be less prescriptive in terms of the criteria that are included.
- 11.114 The SA scores for DLP16 and the reasonable alternative options are shown in **Table 11.6** further ahead in this section. The SA findings for DLP16 are summarised below the table along with the SA findings for the other draft policies in the Retailing and Town Centres chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

11.115 The Council has taken forward DLP16 instead of the reasonable alternative options considered because RA1 would not be able to address specific issues associated with food and drink uses, and RA2 would be too vague to provide significant benefit.

11.116 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP16 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. The policy does permit such uses in defined centres provided that there would not be an inappropriate concentration. DLP16 will therefore have a positive effect on the economy of the District's centres (SA objective 2) and job creation (SA objective 1) as well as on the health of local people (SA objective 4). The policy criteria require proposals not to adversely affect their surroundings and address a range of issues, meaning that positive effects are identified in relation to SA objectives 5: amenity, 7: crime and antisocial behaviour, 10: sustainable transport, 12: landscape and townscape, 15: pollution, 17: waste and 19: climate change. RA1 (no policy) would mean that the positive effects associated with DLP16 would not occur; however national policy and other relevant Local Plan policies would still apply and a negligible rather than negative effect is likely for all of the SA objectives. RA2 (less prescriptive policy) would still have positive effects in relation to most of the SA objectives but there would be less certainty as detailed criteria would not be set out in the policy.

Huddersfield

- 11.117 Draft Policy DLP17: Huddersfield Town Centre sets out detailed criteria that will apply to the future development in the town. Two reasonable alternative options to this policy were identified:
 - RA1: Have no policy in the Local Plan and rely on the NPPF and NPPG or other policies in the Local Plan.
 - RA2: A policy with a more limited approach could be devised which sets out a broad strategy for Huddersfield but not specific criteria.
- 11.118 The SA scores for DLP17 and the reasonable alternative options are shown in **Table 11.6** further ahead in this section. The SA findings for DLP17 are summarised below the table along with the SA findings for the other draft policies in the Retailing and Town Centres section of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.119 The Council has taken forward DLP17 instead of the alternative options considered because RA1 would not sufficiently recognise key important uses within Huddersfield and RA2 would not allow for the consideration of other factors, and could result in high vacancy rates which would not highlight the unique characteristics and specific local circumstances in Huddersfield.
- 11.120 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP17 provides support for the economic development and expansion of Huddersfield and the District and for the development of retail and office uses at Huddersfield; therefore a significant positive effect is likely in relation to SA objectives 2: economy and a minor positive effect in relation to SA objective 1: employment. Making Huddersfield the primary focus for retail and office uses in Kirklees will enable more people to use sustainable transport as the town is well-connected, resulting in positive effects on SA objectives 10: sustainable transport, 15: air quality and 19: climate change. However, mixed effects are likely overall in relation to air quality because there is an AQMA at Huddersfield and air pollution could therefore be compounded by focussing development there. Similarly, there are areas of high flood risk (SA objective 16) that could be affected by development at Huddersfield and potential minor negative effects are identified in relation to both objectives although they are uncertain depending on the exact location of development and the incorporation of mitigation. RA1 (no policy) would mean that the effects (both positive and negative) associated with DLP17 would therefore not occur; however other Local Plan policies, including the spatial development strategy which steers most development to larger urban areas such as Huddersfield, would still apply. Therefore, a negligible effect is likely for all SA objectives. RA2 (more limited policy) would still mean that growth at Huddersfield is pursued; however without the detailed criteria included in DLP17 there is less certainty about the effects associated with DLP17 occurring.

Dewsbury

11.121 Draft Policy DLP18: Dewsbury Town Centre sets out detailed criteria that will apply to the future development of the town. Two reasonable alternative options to this policy were identified:

- RA1: Have no policy in the Local Plan and rely on the NPPF and NPPG or other policies in the Local Plan.
- RA2: A policy could be developed which sets out a quarters approach to the town centre where particular uses are specified for particular areas.
- 11.122 The SA scores for DLP18and the reasonable alternative options are shown in **Table 11.6** further ahead in this section. The SA findings for DLP18are summarised below the table along with the SA findings for the other draft policies in the Retailing and Town Centres chapter of the Draft Local Plan.

- 11.123 The Council has taken forward DLP18 instead of the alternative options considered because RA1 would not aid in the transformation of Dewsbury or provide clear opportunities for investment, and RA2 would be too specific and restrictive.
- 11.124 The SA findings support this decision, being more positive for the draft policy than for the alternative options. The likely effects of DLP18 and the alternative options are very similar to those described above for DLP17 as the draft policy and first alternative option are very similar to those for Huddersfield described above. As with DLP17, DLP18 would have positive effects on the economy (SA objective 2) and job creation (SA objective 1) and focussing development in this relatively well-connected town would benefit SA objectives 10: sustainable transport, 15: air quality and 19: climate change. However, mixed effects are again likely overall in relation to air quality because there is an AQMA at Dewsbury and air pollution could be compounded by development there. Similarly, there are areas of high flood risk (SA objective 16) that could be affected by development and potential minor negative effects are identified in relation to both objectives. RA1 (no policy) would mean that the effects associated with DLP18 would not occur; however other relevant Local Plan policies, including the spatial development strategy which steers most development to larger urban areas such as Dewsbury, would still apply. Therefore, a negligible effect is likely for all SA objectives. RA2 (a more detailed policy) could be inflexible and not allow for town centre uses to respond to changing market conditions, which could have a negative effect on SA objectives 1: job creation and 2: economy, as well as SA objective 6: access to services, particularly over the longer-term. The effects of this option on the other SA objectives are the same as described above for DLP18.

Table 11.6: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Retailing and Town Centres 11.125 The SA scores for the draft policies (DL13-18) are shown in bold.

	DLP13	11	RA2	DLP14	17	RA2	DLP15	11	RA2	DLP16	11	RA2	DLP17	RA1	RA2	DLP18	11	RA2
SA objectives	□□	RA1	X		RA1	\\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\	ቯ	RA1	R/	ቯ	RA1	\ <u>\</u>	□□	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	X	□□	RA1	\frac{\alpha}{2}
1: Employment	+	0	+?	+	0	+/-	+	0	0	+	0	+?	+	0	+?	+	0	-
2: Economic Growth	++	0	+	++	0	+/-	+	0	0	+	0	+?	++	0	+?	++	0	-
3: Education	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0
4: Health	+	0	?	0	0	0	0	0	0	+	0	+?	+	0	0	+	0	+
5: Amenity	0	0	0	0	0	0	+	0	0	++	0	+?	0	0	0	0	0	0
6: Access to Services	++	0	+	++	0	+	+	0	+	+	0	+?	+	0	+?	+	0	-
7: Crime	0	0	0	0	0	0	0	0	0	+	0	+?	+	0	0	+	0	+
8: Recreation	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	+
9: Housing	0	0	0	0	0	0	+	0	-	0	0	0	+	0	0	+	0	+
10: Transport	++	0	+	+	0	+/-	+	0	+	+	0	+?	++	0	+	++	0	++
11: Use of Land	+	0	+?	+	0	+/-	+	0	+	0	0	0	0	0	0	0	0	0
12: Local Character	+	0	+?	+	0	+/-	+	0	0	+	0	+?	+	0	0	+	0	+
13: Historic Environment	+	0	+?	0	0	0	+	0	0	0	0	0	+	0	0	+	0	+
14: Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15: Pollution	+	0	+?	+	0	+/-	+	0	+	+	0	+?	+/-	0	+?/-	+/-	0	+/-
16: Flooding	0	0	0	0	0	0	0	0	0	0	0	0	-?	0	-?	-?	0	-?
17: Waste	0	0	0	0	0	0	+	0	0	+	0	+?	0	0	0	0	0	0
18: Natural Resources	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19: Climate Change	+	0	+?	+	0	+/-	+	0	+?	+	0	+?	+	0	+?	+	0	+

SA findings for the draft policy in Chapter 8 of the Draft Local Plan

- 11.126 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 8 of the Draft Local Plan: Retailing and Town Centres.
- 11.127 The draft policies in Chapter 8 of the Draft Local Plan seek to ensure the vitality and viability of town centres and shopping areas in Kirklees. The nature of the policies means that broadly positive effects are likely in relation to the **economy** (SA objective 2) and **job creation** (SA objective 1), as they seek to restrict town centre and shopping uses to the defined areas, where job opportunities are accessible for more people. Steering development to central areas over out of town locations through these policies will also benefit **sustainable transport** (SA objective 10), air quality (SA objective 15) and climate change (SA objective 19).
- 11.128 Several of the draft policies include detailed criteria that would apply to development in town centres, in relation to sustainability issues such as **amenity** (SA objective 5), **local character** (SA objective 12) and **cultural heritage** (SA objective 13); therefore broadly positive effects have been identified for these objectives.
- 11.129 Potential minor negative effects have been identified in relation to DLP19 and DLP20 as they seek to draw development to Huddersfield and Dewsbury where there are existing issues relating to **air pollution** (SA objective 15) and **flood risk** (SA objective 16); however these effects are uncertain until the locations and details of specific development proposals come forward. Other policies in the Local Plan in relation to protecting air quality and reducing flood risk would also apply to all new development, including any at Huddersfield and Dewsbury.

Transport

11.130 This section relates to the draft policies and alternative options described in Chapter 9 of the Draft Local Plan (November 2015): Transport.

Strategic transport infrastructure

- 11.131 Draft Policy DLP19: Strategic Transport Infrastructure sets out the Council's approach to achieving a balanced and integrated transport network which makes the most efficient and effective use of road, rail and water transport. It refers to a number of specific transport schemes; however these are all cross-references to existing proposals set out in other plans such as the Local Transport Plan 3 (LTP3) and the Single Transport Plan, and it is assumed that the environmental and other effects of the schemes referenced in the policy are being assessed separately through SEA work for those other plans. One reasonable alternative option to this policy was identified:
 - RA1: Have no policy in the Local Plan.
- 11.132 The SA scores for DLP19 and the reasonable alternative option are shown in **Table 11.7** further ahead in this section and the SA findings for DLP19 are summarised below the table along with the SA findings for the other draft policies in the Transport chapter of the Draft Local Plan.

- 11.133 The Council has taken forward DLP19 instead of the alternative option because RA1 would not provide sufficient weight to ensure that the LTP3 is supported.
- 11.134 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP19 seeks to ensure that strategic transport infrastructure is in place to support economic growth and relieve congestion, which is important given the strategic location of Kirklees, and a significant positive effect on SA objective 3: **economy** and a minor positive effect on SA objective 1: **employment** is likely. While the measures set out in DLP19 could be seen as encouraging and facilitating ongoing car use, the schemes referred to in the policy are all coming forward separately to the Local Plan and the policy should also encourage the use of bus, rail and water transport. Improvements to the transport network will reduce congestion which could otherwise affect **health** (SA objective 4) and **air pollution** (SA objective 15); therefore minor positive effects are identified. RA1 (no policy) would mean that the effects (both positive and negative) associated with DLP19 would not occur; however strategic transport infrastructure

improvements are still coming forward separately to the Local Plan and negligible rather than positive or negative effects are therefore identified for RA1.

Sustainable travel

- 11.135 Draft Policy DLP20: Sustainable Travel and Demand Management sets out the Council's approach to reducing the need to travel and encouraging sustainable transport use in place of cars. No reasonable alternative options to this draft policy were identified.
- 11.136 The SA findings for DLP20 can be found in **Table 11.7** further ahead in this section and the SA findings are summarised below the table along with the SA findings for the other draft policies in the Transport chapter of the Draft Local Plan.

Highways and access

- 11.137 Draft Policy DLP21: Highways and Access sets out the Council's approach to managing the highways network in Kirklees. No reasonable alternative options to this draft policy were identified.
- 11.138 The SA findings for DLP21 can be found in **Table 11.7** further ahead in this section and the SA findings are summarised below the table along with the SA findings for the other draft policies in the Transport chapter of the Draft Local Plan.

Parking

- 11.139 Draft Policy DLP22: Parking sets out the Council's approach to managing car parking demand and provision in Kirklees. One reasonable alternative option to this policy was identified:
 - RA1: Have no policy in the Local Plan and rely on a separate Supplementary Planning Document.
- 11.140 The SA scores for DLP22 and the reasonable alternative option are shown in **Table 11.7** further ahead in this section and the SA findings for DLP22 are summarised below the table along with the SA findings for the other draft policies in the Transport chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.141 The Council has taken forward DLP22 instead of the alternative option considered because RA1 would not ensure that parking is clearly established in policy and relevant weight given to the issue.
- 11.142 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP22 would have a significant positive effect on SA objectives 6: access to services because the policy aims to support town centre vitality by ensuring that appropriate short stay parking is provided. While the policy does provide for some car parking, there is a clear message in the policy that provision will be reduced over time as modal shift is encouraged and more people are able to walk and cycle day to day. Various measures are set out to achieve this, including gradual reductions in long stay parking in town centres in conjunction with improvements to sustainable transport opportunities. Cycling provision is also required in new developments. Therefore, a significant positive effect is likely in relation to SA objective 10: sustainable transport and minor positive effects are identified in relation to SA objectives 1: access to jobs, 4: health, 5: amenity, 15: air pollution and 14: biodiversity (due to the indirect effects of reduced air pollution that can otherwise impact upon biodiversity). Under RA1 it is unclear what the Supplementary Planning Document would provide for in relation to car parking standards and therefore an uncertain effect is identified for most of the SA objectives.

Core road and bus routes

- 11.143 Draft Policy DLP23: Core Road and Bus Network sets out the Council's commitment to investing in the main arterial roads and bus routes in the District. One reasonable alternative option to this policy was identified:
 - RA1: Have no policy in the Local Plan.

11.144 The SA scores for DLP23 and the reasonable alternative option are shown in **Table 11.7** further ahead in this section and the SA findings for DLP23 are summarised below the table along with the SA findings for the other draft policies in the Transport chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.145 The Council has taken forward DLP23 instead of the alternative option because to not have a policy in the Local Plan would undermine the aims and objectives of the LTP3 and Single Transport Plan and would not provide sufficient weight and integration with regional transport plans.
- 11.146 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP23 is likely to have a significant positive effect on SA objective 1: employment and a minor positive effect on SA objective 2: economy because it seeks to ensure that the road network in Kirklees can support growth. The measures in the policy aiming to improve transport links will also have minor positive effects on SA objectives 3: access to education, 4: health, 6: access to services and 8: recreation. Mixed (significant positive and minor negative) effects are likely in relation to SA objectives 5: amenity, 10: sustainable transport, 15: pollution and 19: climate change because, while the policy refers to improving the road network, which could have a minor negative effect in terms of facilitating and encouraging ongoing car use, it also aims to improve bus routes and give priority to pedestrians, cyclists and buses, which will help to improve the sustainable transport network. RA1 (no policy) would mean that opportunities to support the objectives of wider transport plans would be lost and the effects associated with DLP23 (both positive and mixed) would not occur; however investment in the transport network would still come forward through other plans and strategies. A negligible effect is therefore likely for all SA objectives.

Core walking and cycling network

- 11.147 Draft Policy DLP24: Core Walking and Cycle Network sets out the Council's commitment to safeguard and extend the core network of cycleways, footpaths and bridleways in the District. Two reasonable alternative options to this policy were identified:
 - RA1: Have no policy in the Local Plan.
 - RA2: Have a generic policy relating to all public rights of way and not have a core network.
- 11.148 The SA scores for DLP24 and the reasonable alternative options are shown in **Table 11.7** below and the SA findings for DLP24 are summarised below the table along with the SA findings for the other draft policies in the Transport chapter of the Draft Local Plan.

- 11.149 The Council has taken forward DLP24 instead of the alternative options because to not have a policy in the Local Plan (RA1) would undermine the aims and objectives of the LTP3 and Single Transport Plan and a generic policy (RA2) would mean that development allocations in the Local Plan are not strategically connected to the walking and cycle network, undermining aims to encourage sustainable transport.
- 11.150 The SA findings support this decision, being more positive for the draft policy than for the reasonable alternative options. The measures in DLP24 to encourage walking and cycling would have a significant positive effect on SA objectives 4: health, 8: recreation and 10: sustainable transport. Minor positive effects are also likely in relation to SA objectives 15: air pollution and 19: climate change as a result of more people walking and cycling. Positive effects are also likely in relation to SA objectives 1: access to jobs and 3: access to education. RA1 (no policy) would mean that opportunities to support the objectives of wider transport plans would be lost; however investment in the transport network would still come forward through other plans and strategies and other relevant Local Plan policies would still apply. Negligible rather than negative effects are therefore likely in relation to all of the SA objectives. RA2 (generic policy) should still bring about improvements to the walking and cycling network; however improvements would not focus on strategically connecting development sites which would mean that the positive effects are less likely in relation to linking people with the key employment sites, services and facilities. Therefore while minor positive effects are likely in relation to SA objectives 4: health, 8: recreation and 10: sustainable transport, effects on other SA objectives would be negligible.

Table 11.7: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Transport

11.151 The SA scores for the draft policies (DLP19-24) are shown in bold.

SA objectives	DLP19	RA1	DLP20	DLP21	DLP22	RA1	DLP23	RA1	DLP24	RA1	RA2
1: Employment	+	0	++	+	+	?	++	0	+	0	0
2: Economic Growth	++	0	+	+	+	?	+	0	0	0	0
3: Education	0	0	+	+	0	0	+	0	+	0	0
4: Health	+	0	++	++	+	?	+	0	++	0	+
5: Amenity	+	0	+	+	+	?	+/-	0	0	0	0
6: Access to Services	0	0	+	+	++	?	+	0	+	0	0
7: Crime	0	0	0	+	0	0	0	0	0	0	0
8: Recreation	0	0	+?	+?	0	0	+	0	++	0	+
9: Housing	0	0	0	0	0	0	0	0	0	0	0
10: Transport	++/-	0	++	++/-	++	?	++/-	0	++	0	+
11: Use of Land	0	0	0	+	0	0	0	0	0	0	0
12: Local Character	0	0	0	0	0	0	0	0	0	0	0
13: Historic Environment	0	0	0	0	0	0	0	0	0	0	0
14: Biodiversity	0	0	0	0	+	?	0	0	0	0	0
15: Pollution	+	0	++	+	+	?	++/-	0	+	0	0
16: Flooding	0	0	0	+	0	0	0	0	0	0	0
17: Waste	0	0	0	0	0	0	0	0	0	0	0
18: Natural Resources	0	0	0	0	0	0	0	0	0	0	0
19: Climate Change	+/-	0	++	+/-	+	?	++/-	0	+	0	0

SA findings for the draft policy in Chapter 9 of the Draft Local Plan

- 11.152 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 9 of the Draft Local Plan: Transport.
- 11.153 The draft policies in the Transport chapter of the Local Plan are likely to have a number of significant positive effects in relation to **sustainable transport** (SA objective 10) because they seek to encourage modal shift, in particular improved walking and cycling which will be achieved by linking strategic development sites to walking and cycle routes.
- 11.154 The Transport policies (in particular DLP19) do make some provision for improvements to the highways network which could be seen to encourage and facilitate ongoing car use; therefore a number of mixed effects are identified for SA objective 10. However, this will bring about benefits for **amenity** (SA objective 5) and **air quality** (SA objective 15) and therefore **health** (SA objective 4). Increased walking and cycling will also mean that people are living more active lifestyles, further benefitting public health.

Design

11.155 This section relates to the draft policies and alternative options described in Chapter 10 of the Draft Local Plan (November 2015): Design.

Design

- 11.156 Draft Policy DLP25: Design sets out detailed design criteria that will apply to new development in Kirklees. One reasonable alternative option to this policy was identified:
 - RA1: Have no policy in the Local Plan and rely on the NPPF and NPPG.
- 11.157 The SA scores for DLP25 and the reasonable alternative option are shown in **Table 11.8** further ahead in this section. The SA findings for DLP25 are summarised below the table along with the SA findings for the other draft policy in the Design chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.158 The Council has taken forward DLP25 instead of the alternative option considered because RA1 (relying on national guidance) would not allow for the specific local characteristics of Kirklees to be addressed.
- 11.159 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP25 is likely to have positive effects on most of the SA objectives because the wide ranging criteria it includes address issues including amenity (SA objective 5), crime (SA objective 7), biodiversity (SA objective 14), energy efficiency (SA objective 18) and flood risk (SA objective 16). Requiring high quality design through all of the specified criteria would have a significant positive effect on SA objective 12: landscape and townscape and the measures in the policy requiring developments to be inclusive and accessible mean that a significant positive effect is also likely in relation to SA objectives 10: sustainable transport as well as a number of other SA objectives relating to access to jobs (SA objective 1) and healthcare (SA objective 4) and reduced air pollution (SA objective 15). RA1 (no policy) would not result in the positive effects identified for DLP25; however given that national planning policy relating to design and the incorporation of open space into development would still apply, a negligible rather than negative effect is likely for all of the SA objectives.

Advertisements and shop fronts

- 11.160 Draft Policy DLP26: Advertisements and Shop Fronts sets out criteria that will apply to shop fronts, signs and advertisements. Two reasonable alternative options to this policy were identified:
 - RA1: Do nothing and rely on the general design policy in the Plan, the NPPF and the NPPG.
 - RA2: A more prescriptive policy could be worded which set out specific design standards for certain shop fronts and advertisements across the District.
- 11.161 The SA scores for DLP26 and the reasonable alternative option are shown in **Table 11.8** below and the SA findings for DLP26 are summarised below the table along with the SA findings for the other draft policy in the Design chapter of the Draft Local Plan.

- 11.162 The Council has taken forward DLP26 instead of the reasonable alternative options considered because RA1 would not reflect locally specific issues and would lack detail, and RA2 could be too restrictive and inflexible.
- 11.163 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP26 would have significant positive effects on SA objectives 12: **local character** and 13: **historic environment** because of the criteria in the policy seeking to ensure that local character is not adversely affected by signage or other shop front advertising. RA1 (no policy) would not specifically address the issue of shop fronts and advertisements in Kirklees; therefore negligible effects are expected on all of the SA objectives. RA2 (more prescriptive policy) would still help to maintain and improve the character of shop fronts; however it would be less able to adapt to local circumstances and so could result in inappropriate signage. An overall mixed effect (significant positive/minor negative) is therefore expected on SA objectives 12: **local character** and 13: **historic environment**.

Table 11.8: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Design

11.164 The SA scores for the draft policies (DLP25 and DLP26) are shown in **bold**.

SA objectives	DLP25	RA1	DLP26	RA1	RA2
1: Employment	+	0	0	0	0
2: Economic Growth	0	0	+	0	+/-
3: Education	0	0	0	0	0
4: Health	+	0	0	0	0
5: Amenity	+	0	0	0	0
6: Access to Services	0	0	0	0	0
7: Crime	+	0	0	0	0
8: Recreation	+	0	0	0	0
9: Housing	++	0	0	0	0
10: Transport	+	0	0	0	0
11: Use of Land	0	0	0	0	0
12: Local Character	++	0	++	0	++/-
13: Historic Environment	+	0	++	0	++/-
14: Biodiversity	++	0	0	0	0
15: Pollution	+	0	0	0	0
16: Flooding	+	0	0	0	0
17: Waste	+	0	0	0	0
18: Natural Resources	+	0	0	0	0
19: Climate Change	++	0	0	0	0

SA findings for the draft policy in Chapter 10 of the Draft Local Plan

- 11.165 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 10 of the Draft Local Plan: Design.
- 11.166 The policies in the Design chapter of the Local Plan seek to ensure that new development in Kirklees adheres to high standards of design; therefore positive effects are likely for several of the SA objectives, in particular as a result of DLP25 which addresses a wider range of criteria than DLP26. Significant positive effects are likely to result from both draft policies in relation to SA objective 12: **local character**, which is unsurprising given the nature of the two policies. DLP26 will also have a significant positive effect on SA objective 13: **historic environment** while for DLP25 significant positive effects are likely in relation to SA objectives 9: **housing**, 14: **biodiversity** and 19: **climate change** because of the specific design criteria set out in the policy.
- 11.167 No likely negative effects, either minor or significant, were identified in relation to either of the draft policies relating to Design.

Climate change

11.168 This section relates to the draft policies and alternative options described in Chapter 11 of the Draft Local Plan (November 2015): Climate Change.

Renewable and low carbon energy

- 11.169 DLP 27: Renewable and Low Carbon Energy sets out the Council's general support for renewable and low carbon energy proposals where the specified criteria are met. Two reasonable alternative options to this policy were identified:
 - RA1: More detailed policy with specific targets.
 - RA2: A policy which identifies particular areas as being potentially suitable for renewable energy development.
- 11.170 The SA scores for DLP27 and the reasonable alternative options are shown in **Table 11.9** further ahead in this section. The SA findings for DLP27 are summarised below the table along with the SA findings for the other draft policies in the Climate Change chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.171 The Council has taken forward DLP27 instead of the alternative options because a more detailed policy with specific targets (RA1) could set an upper expectation of delivery when in fact a higher level can be achieved. The Council considers that a policy which identifies particular areas as being potentially suitable for renewable energy development (RA2) is not necessary because it considers that the evidence base relating to proposals for wind turbines¹⁹ is adequate to form an appropriate judgement for wind turbine applications across the entire District.
- 11.172 The SA findings for DLP27 are broadly similar to those identified for RA2, and more positive than for RA1. DLP27 is likely to have significant positive effects on SA objectives 18: energy efficiency and 19: climate change because it provides broad support for proposals for renewable and low carbon energy generation provided that the specified criteria are met. RA1 (more detailed policy with targets) may help to ensure that at least a minimum level of energy is generated from renewable sources, however, it may set an upper expectation of delivery when in fact higher levels could be achieved and mixed (significant positive and minor negative) effects are therefore likely in relation to these objectives. RA2 (identify particular areas as being potentially suitable for renewable energy development) could go even further than DLP27 in relation to encouraging proposals to come forward and providing clarity for developers and thereby benefitting energy efficiency. Significant positive effects are therefore also likely for that option in relation to SA objectives 18 and 19.
- 11.173 DLP27 will have a positive effect on SA objective 15: **air quality** by encouraging the increased use of clean renewable forms of energy; however the additional certainty that would be provided by RA2 means that a significant positive effect is likely for that option. RA1 would again have mixed effects, for the same reasons described above.
- 11.174 DLP27 is also likely to have positive effects on a number of other SA objectives because it includes criteria seeking to avoid impacts on **amenity** (SA objective 5), the **landscape** (SA objective 12), the **historic environment** (SA objective 13) and **biodiversity** (SA objective 14). It is assumed that the same criteria would be included in a more specific policy under RA2; therefore the same potential positive effects are identified. However, under RA2 there could be slightly more certainty about the positive effects, as identifying particular areas of the District as being potentially suitable for renewable energy development would ensure that areas where impacts may be least likely to occur would be those used for renewable energy development.

Water management: flood risk

- 11.175 Draft Policy DP28: Flood Risk sets out the Council's approach to managing flood risk in Kirklees, reflecting locally specific issues, the Strategic Flood Risk Assessment (SFRA) and the additional flood zone 3a(i) that the SFRA identifies. One reasonable alternative option to this policy was identified:
 - RA1: To directly reflect the NPPF flood zones and not refer to flood zone 3a(i).

¹⁹ South Pennines Wind Energy Landscape Study. For Rossendale, Burnley, Calderdale, Kirklees and Barnsley Councils. (LUC and Julie Martin Associates, October 2014).

11.176 The SA scores for DLP28 and the reasonable alternative option are shown in **Table 11.9** further ahead in this section. The SA findings for DLP28 are summarised below the table along with the SA findings for the other draft policies in the Climate Change chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.177 The Council has taken forward DLP28 instead of the alternative option because RA1 would not reflect locally specific issues and the SFRA.
- 11.178 The SA findings support this decision, being more positive for the draft policy than for the alternative option. Both policies would have a significant positive effect on reducing flood risk (SA objective 16) because of the detailed criteria that are set out seeking to direct development to the most appropriate locations and incorporate mitigation. However, RA1 would involve not reflecting flood zone 3a(i) as defined in the Strategic Flood Risk Assessment for Kirklees in the policy and so it would not be locally specific or include specific criteria relating to what development is appropriate in flood zone 3a(i). This may mean that the policy would be less effective in relation to managing flood risk. A number of minor positive effects on the SA objectives are identified for DLP28 because it would reduce the risk of flooding that could otherwise affect the **economy** (SA objective 2) and therefore **jobs** (SA objective 1), **education** facilities (SA objective 3), healthcare facilities (SA objective 4), services and facilities (SA objective 6), housing (SA objective 9), transport infrastructure (SA objective 10) and cultural heritage assets (SA objective 13). While the same positive effects are likely under RA1, there is less certainty because of the potential for the policy to be less effective at managing flood risk. DLP28 refers to the provision of mitigation which may include open green space, which would have further benefits for health (SA objective 4), the landscape (SA objective 12) and biodiversity (SA objective 14). The same positive effects are identified for RA1 because this particular policy criterion would not be affected by the alternative approach.

Water management: drainage

- 11.179 Draft Policy DLP29: Drainage sets out the Council's approach to managing surface water drainage in developments and promotes the use of SuDS. No reasonable alternative options to this draft policy were identified.
- 11.180 The SA findings for DLP29 can be found in **Table 11.9** further ahead in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Climate Change chapter of the Draft Local Plan.

Water management: management of water bodies

- 11.181 Draft Policy DLP30: Management of Water Bodies relates to development proposals on sites where there is an existing water body. No reasonable alternative options to this draft policy were identified.
- 11.182 The SA findings for DLP30 can be found in **Table 11.9** below. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Climate Change chapter of the Draft Local Plan.

Table 11.9: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Climate Change

11.183 The SA scores for the draft policies (DLP27-30) are shown in **bold**.

SA objectives	DLP27	RA1	RA2	DLP28	RA1	DLP29	DLP30
1: Employment	0	0	0	0	0	0	0
2: Economic Growth	0	0	0	+	+?	0	0
3: Education	0	0	0	+	+?	0	0
4: Health	0	0	0	+	+?	+	+
5: Amenity	+?	+?	+	0	0	0	0
6: Access to Services	0	0	0	+	+?	0	0
7: Crime	0	0	0	0	0	0	0
8: Recreation	0	0	0	+?	+?	0	+
9: Housing	0	0	0	+	+?	0	0
10: Transport	0	0	0	+	+?	0	0
11: Use of Land	0	0	0	0	0	0	0
12: Local Character	+?	+?	+	+?	+?	0	+
13: Historic Environment	+?	+?	+	+	+?	0	0
14: Biodiversity	+?	+?	+	+?	+?	+	++
15: Pollution	+	+/-	++	+	+?	++	+
16: Flooding	0	0	0	++	++?	++	++
17: Waste	0	0	0	0	0	0	0
18: Natural Resources	++	++/-	++	0	0	0	0
19: Climate Change	++	++/-	++	0	0	0	0

SA findings for the draft policy in Chapter 11 of the Draft Local Plan

- 11.184 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 11 of the Draft Local Plan: Climate Change.
- 11.185 The draft policies relating to climate change are likely to have a number of significant positive effects in relation to SA objectives 16: **flooding**, SA objective 18: **natural resources and energy efficiency** and 19: **climate change**, which would be expected due to their subject matter. The policies will combine to deliver renewable energy infrastructure and to manage flood risk in the District and wider positive effects are also likely in relation to a number of the other SA objectives because of the specific criteria addressed in the policy.
- 11.186 Although one of the alternative options to DLP27 scored slightly more positively (RA2, as described above), there is very little difference between the likely effects identified and DLP27 would still have significant positive effects on SA objectives 18 and 19.

Natural environment

11.187 This section relates to the draft policies and alternative options described in Chapter 12 of the Draft Local Plan (November 2015): Natural Environment.

Biodiversity and geodiversity

- 11.188 Draft policy DLP31: Biodiversity and Geodiversity sets out the Council's approach to conserving and enhancing biodiversity and geodiversity assets in Kirklees. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.189 The SA scores for DLP31 can be found in **Table 11.10** further ahead in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Natural Environment chapter of the Draft Local Plan.

Strategic green infrastructure

- 11.190 DLP32: Strategic Green Infrastructure sets out the Council's approach to conserving and enhancing green infrastructure in the areas of Strategic Green Infrastructure that are identified on the Policies Map. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.191 The SA scores for DLP32 can be found in **Table 11.10** further ahead in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Natural Environment chapter of the Draft Local Plan.

Landscape

- 11.192 DLP33: Landscape sets out the Council's approach to conserving and enhancing the character and appearance of the landscape in Kirklees. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.193 The SA scores for DLP33 can be found in **Table 11.10** further ahead in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Natural Environment chapter of the Draft Local Plan.

Trees

- 11.194 DLP34: Trees sets out the Council's approach to protecting valuable trees where new development is proposed. One reasonable alternative option to this policy was identified:
 - RA1: Do nothing.
- 11.195 The SA scores for DLP34 and the reasonable alternative option are shown in **Table 11.10** further ahead in this section. The SA findings for DLP34 are summarised below the table along with the SA findings for the other draft policies in the Natural Environment chapter of the Draft Local Plan.
 - Reasons for selecting the Draft Policy
- 11.196 The Council has taken forward DLP34 instead of the alternative option because RA1 would not provide a policy framework for the protection of valuable or important trees not covered by statutory protection.
- 11.197 The SA findings support this decision, being more positive for the draft policy than for the alternative option. The purpose of DLP34 is to protect trees and the draft policy requires development proposals to normally retain valuable or important trees within the application site, where they contribute to the environment including the wildlife habitat network. A significant positive effect on SA objective 14: **biodiversity** is therefore likely. A minor positive effect is also likely in relation to SA objective 12: **local character** because DLP34 requires development proposals to normally retain valuable or important trees within the application site, where they make a contribution to the aesthetics of the area and the distinctiveness of the location. RA1 (no policy) would mean that the positive effects associated with DLP34 would not occur; however national level policy in the NPPF and other Local Plan policies relating to biodiversity would still be in place and negligible rather than negative effects are therefore likely for all of the SA objectives.

Conserving and enhancing the water environment

11.198 DLP35: Conserving and Enhancing the Water Environment sets out the Council's approach to protecting water quality and ensuring the efficient consumption of water. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.

11.199 The SA scores for DLP35 can be found in **Table 11.10** below. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Natural Environment chapter of the Draft Local Plan.

Table 11.10: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to the Natural Environment

11.200 The SA scores for the draft policies (DLP31-35) are shown in **bold**.

SA objectives	DLP31	DLP32	DLP33	DLP34	RA1	DLP35
1: Employment	-?	0	0	0	0	0
2: Economic Growth	-?	0	0	0	0	0
3: Education	0	0	0	0	0	0
4: Health	0	+	0	0	0	+
5: Amenity	0	0	0	0	0	0
6: Access to Services	0	0	0	0	0	0
7: Crime	0	0	0	0	0	0
8: Recreation	0	++	0	0	0	0
9: Housing	-?	0	0	0	0	0
10: Transport	0	+	0	0	0	0
11: Use of Land	+?	0	0	0	0	0
12: Local Character	+?	++	++	+	0	0
13: Historic Environment	0	+	+	0	0	0
14: Biodiversity	++	++	0	++	0	+
15: Pollution	0	+	0	0	0	++
16: Flooding	+?	+	0	0	0	+
17: Waste	0	0	0	0	0	0
18: Natural Resources	0	0	0	0	0	++
19: Climate Change	0	+	0	+	0	0

SA findings for the draft policy in Chapter 12 of the Draft Local Plan

- 11.201 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 12 of the Draft Local Plan: Natural Environment.
- 11.202 A large number of negligible effects have been identified for the Draft Policies in the Natural Environment chapter of the Draft Local Plan, as they cover specific topic areas relating to biodiversity, the landscape, green infrastructure, trees and the water environment. As the policies seek to protect and enhance the natural environment, the effects that have been identified are broadly very positive.
- 11.203 Three policies (DLP31, DLP32 and DLP34) are likely to have significant positive effects on SA objective 14: **biodiversity** as their primary purpose is to protect and enhance biodiversity and trees and, in the case of DLP32, to ensure that green infrastructure is provided in new developments. This will have benefits for biodiversity as a result of habitat creation and improved habitat connectivity. The wider benefits of green infrastructure also mean that positive effects are likely to result from Draft Policy DLP32 in relation to SA objectives 4: **health**, 8: **recreation**, 12: **local character**, 13: **historic environment** and 16: **flooding**. Green infrastructure provision may also encourage walking and cycling through the provision of new routes, which would also

- have positive effects in relation to SA objectives 10: **sustainable transport**, 15: **pollution** and 19: **climate change**.
- 11.204 Similarly, the measures set out in DLP35 to protect and enhance the water environment are likely to have a significant positive effect on SA objectives 15: **pollution** and 19: **natural resources** as the measures in the policy specifically aim to protect and enhance water quality and encourage efficient water consumption. Wider benefits are also likely and positive effects are identified for SA objectives 4: **health**, 14: **biodiversity** and 16: **flooding**.
- 11.205 The effects of DLP31 are slightly more mixed than for the other Natural Environment policies, as the measures set out in the policy seeking to protect and enhance biodiversity and geodiversity could potentially restrict development in some locations. Therefore, potential minor negative effects have been identified in relation to SA objectives 1: **employment**, 2: **economic growth** and 9: **housing**.
- 11.206 No likely significant negative effects have been identified for any of the policies in the Natural Environment chapter of the Local Plan.

Historic environment

11.207 This section relates to the draft policy and alternative option described in Chapter 13 of the Draft Local Plan (November 2015): Historic Environment.

Historic environment

- 11.208 Draft policy DLP36: Historic Environment sets out the Council's approach to conserving and enhancing cultural heritage in Kirklees. One reasonable alternative option to this policy was identified:
 - RA1: Have no policy in the Local Plan specifically relating to the Historic Environment and instead deal with the issue through the Design policy.
- 11.209 The SA scores for DLP36 and the reasonable alternative option are shown in **Table 11.11** below. The SA findings are summarised below the table.

- 11.210 The Council has taken forward DLP36 instead of RA1 because it considers that the provision of a separate policy provides greater clarity on how the Council will meet its statutory requirements with regard to heritage assets.
- 11.211 The SA findings support this decision, being more positive for the draft policy than for the reasonable alternative option. DLP36 would have positive effects only in relation to SA objectives 12: local character, 13: historic environment and 19: climate change (because the purpose of DLP36 is to conserve and enhance heritage features, and the policy sets out various measures for achieving this, some of which will benefits wider local character and the townscape. In addition, DLP36 refers to measures to mitigate and adapt to climate change. Policy DLP36 would have negligible effects on all other SA objectives.
- 11.212 RA1 would have a negligible effect on all of the SA objectives because, although a specific historic environment policy would not be included in the Local Plan and therefore the potential positive effects associated with DLP36 would not apply, the issue would be covered to some extent under the Design policy and in national policy. Therefore a negligible rather than negative effect would be likely.
- 11.213 No likely negative effects, either minor or significant, were identified in relation to DLP36 or the alternative option.

Table 11.11: Summary of SA Scores for Draft Local Plan policy and reasonable alternative relating to the Historic Environment

11.214 The SA scores for the draft policy DLP36 are shown in **bold**.

								SA	Obj	ective	S								
	1: Employment	2: Economic growth	3: Education	4: Health	5: Amenity	6: Access to services	7: Crime	8: Recreation	9: Housing	10: Transport	11: Use of Land	12: Local character	13: Historic environment	14: Biodiversity	15: Pollution	16: Flooding	17: Waste	18: Natural resources	19: Climate change
DLP 36	o	0	0	0	0	0	0	o	0	0	0	++	++	0	0	o	o	0	+?
RA1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

SA findings for the draft policy in Chapter 13 of the Draft Local Plan

- 11.215 The differences between the SA findings for the draft policy and its alternative option were summarised above. This section summarises the likely effects of the draft policy as set out in Chapter 13 of the Draft Local Plan: Historic Environment.
- 11.216 The purpose of DLP36 is to conserve and enhance heritage features, and the policy sets out various measures for achieving this. All development proposals must conserve the significance of both designated and non-designated heritage assets and proposals for new development within Conservation Areas must conserve the elements which contribute to the significance of the Conservation Area. Innovative design is encouraged, where it would not prejudice the significance of heritage assets. A significant positive effect is therefore likely in relation to SA objective 13: historic environment. A significant positive effect is also likely in relation to SA objective 12: local character because DLP36 sets out measures to conserve and enhance the historic environment, some of which will benefits wider local character and the townscape; for example, it requires development proposals to maintain and reinforce local distinctiveness.
- 11.217 A potential minor positive effect on SA objective 19: **climate change** has also been identified because DLP36 refers to measures to mitigate and adapt to climate change, stating that opportunities to do so (including through the use of new technologies) should be taken where they do not harm the significance of heritage assets. Where conflict cannot be avoided it is stated that the benefits of the measure would be balanced with the potential harm to the significance of the heritage asset(s).

Minerals

11.218 This section relates to the draft policies and alternative options described in Chapter 14 of the Draft Local Plan (November 2015).

Proposals for mineral extraction

- 11.219 Draft policy DLP37: Proposals for Minerals Extraction sets out the Council's approach to considering proposals for mineral extraction in Kirklees. No reasonable alternatives to this policy were identified.
- 11.220 The SA scores for DLP37 are shown in **Table 11.12** further ahead in this section and the SA findings are summarised below the table along with the SA findings for the other draft policies in the Minerals chapter of the Draft Local Plan.

Site restoration and aftercare

- 11.221 Draft Policy DLP38: Site Restoration and Aftercare sets out the Council's expectations in terms of proposals for the restoration of minerals sites. One reasonable alternative to this draft policy was identified:
 - RA1: Do nothing and rely on the NPPF.
- 11.222 The SA scores for DLP38 and the reasonable alternative option are shown in **Table 11.12** further ahead in this section and the SA findings for DLP38 are summarised below the table along with the SA findings for the other draft policies in the Minerals chapter of the Draft Local Plan.
 - Reasons for selecting the Draft Policy
- 11.223 The Council has taken forward DLP38 instead of the alternative option because RA1 would not provide as much clarity for both the applicant and the planning authority.
- 11.224 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP38 would have positive effects on most of the SA objectives because it includes a wide range of criteria that would apply to proposals for minerals site restoration. The requirement for proposals to provide for local amenity uses including sport and recreation will have a significant positive effect on SA objective 8: access to recreation and a minor positive effect on SA objective 4: health. The policy also requires restoration proposals to include measures to provide educational opportunities to visit such restored sites and a further minor positive effect is therefore likely in relation to SA objective 4: education. The criteria that are set out for restoration proposals also relate to impacts on the landscape (SA objective 12) and biodiversity (SA objective 14) as well as flood risk (SA objective 16) and climate change (SA objective 19). Positive effects are therefore likely for all of those SA objectives. In contrast, RA1 (no policy) would have negligible effects on all of the SA objectives because there would be less clarity about requirements for minerals site restoration and aftercare and the issues that must be taken into account; however other relevant national and local policies would still apply.

Minerals safeguarding

- 11.225 Draft policy DLP39: Minerals Safeguarding sets out the Council's intended approach to safeguarding minerals resources in Kirklees. Two reasonable alternatives to this policy were identified:
 - RA1: Remove the need for buffers.
 - RA2: Safeguard the entire mineral resource.
- 11.226 The SA scores for DLP39 and the reasonable alternative options are shown in **Table 11.12** further ahead in this section and the SA findings for DLP39 are summarised below the table along with the SA findings for the other draft policies in the Minerals chapter of the Draft Local Plan.
 - Reasons for selecting the Draft Policy
- 11.227 The Council has taken forward DLP39 instead of the alternative options because RA1 (removing the need for buffers) could lead to non-mineral development occurring in locations that sterilise the minerals resource. RA2 (safeguard the entire minerals resource) is not considered necessary because it would involve safeguarding minerals resources within urban areas where the majority of minerals would already have been sterilised by existing development, and some minerals resources within international designations. Safeguarding minerals should not be necessary within international designations because both minerals and non-minerals related developments are likely to be inappropriate within these sensitive areas.
- 11.228 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP39 and RA1 may both have minor negative effects on SA objective 9: housing if they were to restrict residential developments coming forward in safeguarded areas. Under RA2 the safeguarded area would be more widespread; therefore a potential significant negative effect is identified for SA objective 9. DLP39 outlines the criteria that need to be demonstrated to allow surface development to be permitted in a mineral safeguarding area, also outlining certain buffers for different mineral resources. This ensures the efficient use of minerals (SA objective 18) and a significant positive effect is therefore likely on this SA objective. The same effect is identified for RA2, which would safeguard an even larger area of

resource. Under RA1, mineral safeguarding areas would still be in place; however the additional safeguarding buffers for clay and shale or sand and gravel, and sandstone or coal will be removed which could result in the sterilisation of minerals in those areas and a minor rather than significant positive effect is therefore likely on SA objective 18 for that option.

Protecting existing and planned minerals infrastructure

- 11.229 Draft policy DLP40: Protecting Existing and Planned Minerals Infrastructure identifies sites that are considered to provide for minerals-related infrastructure and which will therefore be safeguarded from non-minerals related development. No reasonable alternative options to this policy were identified.
- 11.230 The SA scores for DLP40 are shown in **Table 11.12** further ahead in this section and the SA findings are summarised below the table along with the SA findings for the other draft policies in the Minerals chapter of the Draft Local Plan.

Alternative development on protected minerals infrastructure sites

- 11.231 Draft Policy DLP41: Alternative Development on Protected Minerals Infrastructure Sites sets out the Council's approach to proposals for development on safeguarded minerals infrastructure sites. One reasonable alternative to this draft policy was identified:
 - RA1: Do nothing and rely on the NPPF.
- 11.232 The SA scores for DLP41 and the reasonable alternative option are shown in **Table 11.12** further ahead in this section and the SA findings for DLP41 are summarised below the table along with the SA findings for the other draft policies in the Minerals chapter of the Draft Local Plan.
 - Reasons for selecting the Draft Policy
- 11.233 The Council has taken forward DLP41 instead of the alternative option because RA1 would not provide flexibility or allow for the reuse of redundant sites that are no longer economically viable to bring back into use for their original intended purpose.
- 11.234 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP41 may have positive effects on SA objectives 1: **job creation**, 2: **economy** and 9: **housing** if applicants can demonstrate the required criteria and undertake commercial or residential development on a site that was uneconomically viable for minerals infrastructure. RA1 (do nothing) would not provide the flexibility to allow for the reuse of redundant sites that are no longer economically viable for minerals infrastructure. This could have a minor negative effect on SA objectives 1: **job creation**, 2: **economy** and 9: **housing**.

Proposals for exploration and appraisal of hydrocarbons

- 11.235 Draft policy DLP42: Proposals for Exploration and Appraisal of Hydrocarbons sets out criteria that will apply to proposals for the exploration and appraisal of onshore oil and gas. No reasonable alternative options to this policy were identified.
- 11.236 The SA scores for DLP42 are shown in **Table 11.12** further ahead in this section and the SA findings are summarised below the table along with the SA findings for the other draft policies in the Minerals chapter of the Draft Local Plan.

Proposals for production of hydrocarbons

- 11.237 Draft policy DLP43: Proposals for Production of Hydrocarbons sets out criteria that will apply to proposals for production of hydrocarbons. No reasonable alternative options to this policy were identified.
- 11.238 The SA scores for DLP43 are shown in **Table 11.12** further ahead in this section and the SA findings are summarised below the table along with the SA findings for the other draft policies in the Minerals chapter of the Draft Local Plan.

Table 11.12: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Minerals

11.239 The SA scores for the draft policies (DLP37-43) are shown in **bold**.

SA objectives	DLP37	DLP38	RA1	DLP39	RA1	RA2	DLP40	DLP41	RA1	DLP42	DLP43
1: Employment	0	0	0	0	0	0	+/-?	+	-	0	0
2: Economic Growth	0	0	0	0	0	0	+/-?	+	-	0	0
3: Education	0	+	0	0	0	0	0	0	0	0	0
4: Health	+	+	0	0	0	0	0	0	0	0	0
5: Amenity	++	0	0	0	0	0	0	0	0	+	+
6: Access to Services	0	0	0	0	0	0	0	0	0	0	0
7: Crime	0	0	0	0	0	0	0	0	0	0	0
8: Recreation	+	++	0	0	0	0	0	0	0	0	0
9: Housing	0	0	0	-?	-?	?	-?	+	-	0	0
10: Transport	0	0	0	0	0	0	0	0	0	0	+
11: Use of Land	+	+	0	0	0	0	0	0	0	0	0
12: Local Character	+	+	0	0	0	0	0	0	0	+	+
13: Historic Environment	+	O	0	0	0	0	0	0	0	+	+
14: Biodiversity	+	++	0	0	0	0	0	0	0	+	+
15: Pollution	+	0	0	0	0	0	+	0	0	+	+
16: Flooding	+	+	0	0	0	0	0	0	0	0	+
17: Waste	0	0	0	0	0	0	0	0	0	0	0
18: Natural Resources	0	0	0	++	+	++	0	0	0	0	0
19: Climate Change	0	+	0	0	0	0	+	0	0	0	+

SA findings for the draft policy in Chapter 14 of the Draft Local Plan

- 11.240 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 14 of the Draft Local Plan: Minerals.
- 11.241 The draft policies in the Minerals chapter of the Draft Local Plan will have a large number of negligible effects, due to their specific subject matter.
- 11.242 DLP37, DLP38, DLP42 and DLP43 set out criteria relating to a wide range of sustainability topics so are likely to have positive effects on several of the SA objectives in particular SA objectives 5: amenity, 11: efficient use of land, 12: local character, 13: historic environment, 14: biodiversity and geodiversity and 16: flooding.
- 11.243 DLP39 is likely to have a significant positive effect on SA objective 18: **efficient use of resources** because it sets out the criteria that need to be demonstrated to allow surface
 development to be permitted in a mineral safeguarding area, also outlining certain buffers for
 different mineral resources. This will ensure the efficient use of minerals as a resource,
 safeguarding them for future use. While the other policies relate to minerals planning, they will
 not have a direct effect on the efficient use of resources.

Waste

11.244 This section relates to the draft policies and alternative options described in Chapter 15 of the Draft Local Plan (November 2015): Waste.

Waste management hierarchy

- 11.245 Draft policy DLP44: Waste Management Hierarchy sets out the Council's approach to encouraging waste minimisation and the re-use and recovery of waste materials. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.246 The SA findings for DLP44 can be found in **Table 11.13** further head in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Waste chapter of the Draft Local Plan.

New waste management facilities

- 11.247 Draft policy DLP45: New Waste Management Facilities sets out detailed criteria that will apply to proposals relating to new waste management facilities. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.248 The SA findings for DLP45 can be found in **Table 11.13** further head in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Waste chapter of the Draft Local Plan.

Safeguarding waste management sites and infrastructure

- 11.249 Draft Policy DLP46: Safeguarding Waste Management Sites and Infrastructure sets out the Council's approach to safeguarding existing waste management facilities and the surrounding land. Two reasonable alternative options to this policy were identified:
 - RA1: To not allow any other development to take place on these sites other than employment.
 - RA2: Do nothing.
- 11.250 The SA scores for DLP46 and the reasonable alternative options are shown in **Table 11.13** further ahead in this section and the SA findings are summarised below the table.

Reasons for selecting the Draft Policy

- 11.251 The Council has taken forward DLP46 instead of the alternative options considered because RA1 would not allow land to come forward for non-waste related developments at waste sites if it was proven that the waste facility was no longer required, and RA2 would make it more difficult for the Council to work towards meeting its waste targets and requirements.
- 11.252 The SA findings support this decision, being more positive for the draft policy than for the alternative option. Safeguarding existing waste management facilities through policy DLP46 may have a minor negative effect on SA objectives 1: employment, 2: economy and 9: housing if this approach were to restrict commercial or housing developments coming forward at safequarded waste sites. However, while RA1 and RA2 are more positive in this regard, DLP46 is likely to have a significant positive effect in relation to SA objective 17: waste while RA1 would have a minor negative effect and RA2 a significant negative effect. This is because the primary purpose of DLP46 is to ensure that the District has capacity to handle waste, avoiding the need to export it to destinations further afield. Under RA1, waste sites would be safeguarded against nonemployment related uses but they could potentially be redeveloped for employment uses. This could make it more difficult for the Council to meet its long-term waste management requirements. Under RA2 waste sites would not be safeguarded in any circumstances which could have a significant negative effect on enabling the Council to meet its long-term waste management requirements. The fact that DLP46 would mean that waste is managed closer to its source means that minor positive effects are also likely in relation to SA objectives 15: air pollution and 19: climate change as there should be less of a requirement for waste to be transported by HGV over longer distances. RA1 and RA2 would have the opposite effect and therefore a minor negative effect is likely for those two SA objectives for both options.

Waste disposal

11.253 DLP47: Waste Disposal sets out the Council's approach to landfill. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.

11.254 The SA findings for DLP47 can be found in **Table 11.13** below. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Waste chapter of the Draft Local Plan.

Table 11.13: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Waste

11.255 The SA scores for the draft policies (DLP44-47) are shown in **bold**.

SA objectives	DLP44	DLP45	DLP46	RA1	RA2	o DLP47
1: Employment	0	0	-?	+?	+?	
2: Economic Growth	0	0	-?	+?	+?	0
3: Education	0	0	0	0	0	0
4: Health	0	+	0	0	0	0
5: Amenity	+	++	0	0	0	0
6: Access to Services	0	0	0	0	0	0
7: Crime	0	0	0	0	0	0
8: Recreation	0	0	0	0	0	0
9: Housing	0	0	-?	-?	+?	0
10: Transport	0	0	0	0	0	0
11: Use of Land	0	+	0	0	0	0
12: Local Character	0	+	0	0	0	-?
13: Historic Environment	0	+	0	0	0	0
14: Biodiversity	0	+	0	0	0	0
15: Pollution	+	++	+	-?	-?	0
16: Flooding	0	+	0	0	0	0
17: Waste	++	+	++	-?	?	+
18: Natural Resources	+	0	0	0	0	0
19: Climate Change	++	+	+	-?	-?	0

SA findings for the draft policy in Chapter 15 of the Draft Local Plan

- 11.256 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 15 of the Draft Local Plan: Waste.
- 11.257 The nature of the waste policies means that positive effects (either minor or significant) are identified for all of the draft policies that have been taken forward in the Local Plan in relation to SA objective 17: **waste**. The policies will combine to ensure that Kirklees has capacity to deal with its waste management requirements and to ensure that any new facilities are high quality.
- 11.258 Ensuring that there is capacity within the District to meet waste management needs will reduce the need to transport waste further afield which would have positive effects on SA objectives 5: amenity 15: pollution and 19: climate change.
- 11.259 As described above, while a number of potential minor negative effects have been identified in relation to DLP46, if safeguarding waste sites were to restrict other forms of development, the policy overall will have more positive sustainability effects than the alternative options considered.

Health and supporting communities

11.260 This section relates to the draft policies and alternative options described in Chapter 16 of the Draft Local Plan (November 2015): Health and Supporting Communities.

Healthy, active and safe lifestyles

- 11.261 Draft policy DLP48: Healthy, Active and Safe Lifestyles sets out the Council's approach to promoting healthier lifestyles amongst the residents of Kirklees, including increasing levels of physical activity and improving diets. One reasonable alternative option to this policy was identified:
 - RA1: Do nothing and rely on the NPPF.
- 11.262 The SA scores for DLP48 and the reasonable alternative option are shown in **Table 11.14** further ahead in this section. The SA findings for DLP48 are summarised below the table along with the SA findings for the other draft policies in the Health and Supporting Communities chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.263 The Council has taken forward DLP48 instead of the reasonable alternative option considered because RA1 would not provide a clear local framework for tackling health issues, bringing together health outcomes from other plans.
- 11.264 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP48 is likely to have a significant positive effect on SA objective 4: health because it sets out measures directly promoting health and well-being. DLP48 is also likely to have a significant positive effect on SA objective 8: recreation facilities because it aims to increase access to high quality and well maintained green spaces and green infrastructure, active designs, play, sports, leisure and cultural facilities. Additionally, DLP48 is also likely to have a significant positive effect on SA objective 10: transport because it supports active modes of transport and developments that incorporate active design and on SA objective 15: pollution because it seeks to minimise and mitigate potential harm from air pollution and other environmental hazards. RA1 (no policy) would not result in the positive effects associated with DLP48; however other national and local planning policy would still apply; therefore a negligible rather than negative effect is likely for all of the SA objectives.

Sustaining community facilities and services

- 11.265 Draft Policy DLP49: Community Facilities and Services sets out the Council's approach to retaining and enhancing services and facilities within the District's communities. One reasonable alternative option to this policy was identified:
 - RA1: Do nothing and rely on the NPPF.
- 11.266 The SA scores for DLP49 and the reasonable alternative option are shown in **Table 11.14** further ahead in this section. The SA findings for DLP49 are summarised below the table along with the SA findings for the other draft policies in the Health and Supporting Communities chapter of the Draft Local Plan and the reasonable alternatives considered.

- 11.267 The Council has taken forward DLP49 instead of the alternative option because RA1 (relying on the NPPF) would not provide sufficient guidance for the appropriate consideration of proposals involving the loss of community facilities.
- 11.268 The SA findings support this decision, being more positive for the draft policy than for the reasonable alternative options. The purpose of DLP52 is to support development that protects, retains or enhances the provision, quality or accessibility of existing community education, leisure and cultural facilities; therefore it is likely to have a significant positive effect on SA objectives 3: education, 4: health, 6: access to services and 8: recreation. Under RA1 there would be no policy in the Local Plan which would specifically address community facilities and services in Kirklees and instead there would be a reliance on the text of the NPPF. This approach would not be directly related to the local needs of Kirklees; however given that national planning policy

relating to community facilities and services into development would still apply, a negligible rather than negative effect is likely for all of the SA objectives.

Educational and healthcare needs

- 11.269 Draft policy DLP50: Educational and Healthcare Needs sets out the Council's approach to ensuring that education and healthcare facilities are available to support the growing population in Kirklees. One reasonable alternative option to this policy was identified:
 - RA1: Do nothing and rely on the NPPF.
- 11.270 The SA scores for DLP50 and the reasonable alternative option are shown in **Table 11.14** further ahead in this section. The SA findings for DLP50 are summarised below the table along with the SA findings for the other draft policies in the Health and Supporting Communities chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.271 The Council has taken forward DLP50 instead of the reasonable alternative option because it considers that the policy as drafted provides a clear framework for ensuring the consideration of education and healthcare infrastructure as an integral part of decision making in keeping with the Kirklees Health and Well-being Strategy.
- 11.272 The SA findings support this decision, being more positive for the draft policy than for the alternative option. The purpose of DLP50 is to ensure that education facilities are available to support the growing population and meet the needs of local people, and that they are located in accessible areas; therefore a significant positive effect is likely on objective 3: **education** as the need for any additional school places will be of a material consideration when housing applications are determined. DLP50 is also likely to have a significant positive effect on objective 4: **health** as it ensures that healthcare facilities will be available to support the growing population and meet the needs of local people, and that they are located in accessible areas. Under RA1 there would be no policy in the Local Plan which would specifically address educational and healthcare needs in Kirklees and instead there would be a reliance on the text of the NPPF. This approach would not be directly related to the local needs of Kirklees; however given that national planning policy relating to educational and healthcare into development would still apply, a negligible rather than negative effect is likely for all of the SA objectives.

Protection and improvement of local air quality

- 11.273 DLP51: Protection and Improvement of Local Air Quality sets out the Council's strategy for maintaining and enhancing air quality and avoiding air pollution. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.274 The SA scores for DLP51 can be found in **Table 11.14** below. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Health and Supporting Communities chapter of the Draft Local Plan.

Protection and improvement of environmental quality

- 11.275 Draft policy DLP52: Protection and Improvement of Environmental Quality sets out the Council's strategy for maintaining and enhancing environmental quality in Kirklees. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.276 The SA scores for DLP52 can be found in **Table 11.14** below. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Health and Supporting Communities chapter of the Draft Local Plan.

Contaminated and unstable land

11.277 DLP53: Contaminated and Unstable Land sets out the Council's strategy for dealing with development proposals on contaminated or unstable land. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.

11.278 The SA scores for DLP53 can be found in **Table 11.14** below. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Health and Supporting Communities chapter of the Draft Local Plan.

Sport and physical activity

- 11.279 Draft Policy DLP54: Sport and Physical Activity sets out the Council's approach to protecting and enhancing sport and leisure provision in the District. One reasonable alternative option to this policy was identified:
 - RA1: Do nothing and rely on the NPPF.
- 11.280 The SA scores for DLP54 and the reasonable alternative option are shown in **Table 11.14** below. The SA findings for DLP54 are summarised below the table along with the SA findings for the other draft policies in the Health and Supporting Communities chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.281 The Council has taken forward DLP54 instead of the reasonable alternative option considered because relying on the NPPF would not allow for the consideration of locally specific circumstances.
- 11.282 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP54 seeks to protect, enhance and support new outdoor and indoor sport and leisure facilities which will encourage people in Kirklees to be physically active and therefore promotes a healthier lifestyle so is likely to have a significant positive effect on SA objective 4: health. Any proposal that would result in the loss of community sports facilities should be supported by a detailed needs assessment report. DLP54 is also likely to have significant positive effects on SA objectives 6: access to services and 8: recreation because in order to justify the loss of a facility it would need to be demonstrated that the site is no longer required to meet a deficiency in sporting provision, or an equivalent or better replacement facilities are accessible or an alternative sporting facility outweighs the loss of the existing facility. Under RA1 there would be no policy in the Local Plan which would specifically address sport and physical activity in Kirklees and instead there would be a reliance on the text of the NPPF. This approach would not be directly related to the local needs of Kirklees; however given that national planning policy relating to sport and physical activity into development would still apply, a negligible rather than negative effect is likely for all of the SA objectives.

Table 11.14: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Health and Supporting Communities

11.283 The SA scores for the draft policies (DLP48-54) are shown in **bold**.

SA objectives	DLP48	RA1	DLP49	RA1	DLP50	RA1	DLP51	DLP52	DLP53	DLP54	RA1
1: Employment	+	0	0	0	0	0	0	0	0	0	0
2: Economic Growth	0	0	0	0	0	0	0	0	0	0	0
3: Education	+	0	++	0	++	0	0	0	0	0	0
4: Health	++	0	++	0	++	0	+	+	++	++	0
5: Amenity	+	0	0	0	0	0	0	++	0	0	0
6: Access to Services	+	0	++	0	0	0	0	0	0	++	0
7: Crime	+	0	0	0	0	0	0	0	0	0	0
8: Recreation	++	0	++	0	0	0	0	0	0	++	0
9: Housing	0	0	0	0	0	0	0	0	+	0	0
10: Transport	++	0	0	0	+	0	++	+	0	0	0

SA objectives	DLP48	RA1	DLP49	RA1	DLP50	RA1	DLP51	DLP52	DLP53	DLP54	RA1
11: Use of Land	0	0	0	0	0	0	0	0	0	0	0
12: Local Character	0	0	0	0	0	0	0	0	0	0	0
13: Historic Environment	0	0	0	0	0	0	0	0	0	0	0
14: Biodiversity	+	0	0	0	0	0	+	+	+	0	0
15: Pollution	++	0	+	0	+	0	++	++	++	0	0
16: Flooding	+	0	0	0	0	0	0	0	0	+	0
17: Waste	0	0	0	0	0	0	0	0	0	0	0
18: Natural Resources	0	0	0	0	0	0	0	0	0	0	0
19: Climate Change	+	0	+	0	+	0	+	+	0	0	0

SA findings for the draft policy in Chapter 16 of the Draft Local Plan

- 11.284 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 16 of the Draft Local Plan: Health and Supporting Communities.
- 11.285 The nature of the health and supporting community policies means that positive effects (either minor or significant) are identified for all of the draft policies that have been taken forward in the Local Plan in relation to SA objective 4: **health**. The policies will combine to benefit the health of local communities by ensuring that there are open space and sport facilities available, and that essential infrastructure such as healthcare facilities are available to meet the needs of the growing population.
- 11.286 As well as improving health, SA objectives 15: **pollution**, 10: **transport** and 19: **climate change** are also expected to be positively affected by the measures set out in these policies as they include criteria that seek to improve the environment, which in turn has health benefits.
- 11.287 As can be seen in **Table 11.14**, there are no likely negative effects (either minor or significant identified in relation to the policies in this section of the Local Plan and the draft policies will have more positive sustainability effects than the alternative options considered.

Open land and Green Belt

11.288 This section relates to the draft policies and alternative options described in Chapter 17 of the Draft Local Plan (November 2015).

Green Belt: Development in the Green Belt

- 11.289 Draft Policy DLP55: Development in the Green Belt sets out the Council's overarching approach to protecting and enhancing the Green Belt in Kirklees. One reasonable alternative option to this policy was identified:
 - RA1: Have no policy and rely on the NPPF.
- 11.290 The SA scores for DLP55 and the reasonable alternative option are shown in **Table 11.15** further ahead in this section. The SA findings for DLP55 are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.291 The Council has taken forward DLP55 instead of the alternative option because having a policy in the Local Plan offers the opportunity to bring together the overarching criteria that should be applied when considering any development proposals within the green belt, including development which may not be subject to other policies.
- 11.292 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP55 is likely to have a significant positive effect on SA objective 12: **local character** as it would limit development in the green belt and requires development within the green belt to have regard for the character and openness of the area as well as relevant parts of the Landscape Character Assessment. Restricting development in the green belt is also likely to have minor positive effects on SA objectives 4: **health**, 5: **amenity**, 8: **recreation**, 11: **efficient use of land**, 14: **biodiversity** and 15: **flood risk**. However, a potential minor negative effect is identified in relation to SA objective 9: **housing** because DLP55 may limit the area of land which is available for housing development in the District. RA1 (no policy) would not result in the positive and negative effects associated with DLP55, but given that national planning policy relating to development in the green belt would still apply, a negligible rather than negative effect is likely for all of the SA objectives.

Green Belt: Buildings for agriculture and forestry

- 11.293 Draft Policy DLP56: Buildings for Agriculture and Forestry sets out the Council's approach to proposals for agriculture and forestry-related buildings in the green belt. Two reasonable alternative options to this policy were identified:
 - RA1: Have no policy and rely on the NPPF.
 - RA2: The policy could be more specific.
- 11.294 The SA scores for DLP56 and the reasonable alternative options are shown in **Table 11.15** further ahead in this section. The SA findings for DLP56 are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.295 The Council has taken forward DLP56 instead of the alternative option because the NPPF does not include guidance on the circumstances in which proposals for agriculture and forestry-related buildings will be considered to be appropriate, and because a more specific policy could be too restrictive and would not allow for the proper consideration of proposals on their own merit.
- 11.296 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP56 is likely to have a significant positive effect on SA objective 12: local character and a minor positive effect on SA objective 5: amenity because it restricts the development of agricultural and forestry buildings in the green belt, and it requires levels of noise and odour to not be of detriment to residential amenity. As DLP56 allows for buildings to support the agriculture and forestry industries in the green belt, minor positive effects are likely in relation to SA objectives 1: employment and 2: economic growth. Conversely, RA1 (no policy) is unlikely to have these positive effects; however given that national planning policy relating to development in the green belt would still apply, a negligible rather than negative effect is likely. This is the same for all of the other SA objectives. RA2 (a more prescriptive policy) would be likely to have the same benefits as DLP56 in relation to maintaining the character and quality of Kirklees' landscape and townscape; however this approach would be inflexible and could be too restrictive, not allowing for the proper consideration of individual proposals on their own merits which would have the opposite effect. A mixed effect (consisting of minor positive and minor negative effects) is therefore likely overall in relation to SA objectives 5: amenity and 12: landscape character.

Green Belt: Agricultural and forestry workers' dwellings

11.297 Draft Policy DLP57: Agricultural and Forestry Workers' Dwellings sets out the Council's approach to proposals for residential properties for agriculture and forestry workers. Two reasonable alternative options to this policy were identified:

- RA1: Have no policy and rely on the NPPF.
- RA2: The policy could be more specific.
- 11.298 The SA scores for DLP57 and the reasonable alternative options are shown in **Table 11.15** further ahead in this section. The SA findings for DLP57 are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.299 The Council has taken forward DLP57 instead of the alternative option because the NPPF does not include guidance on the circumstances in which proposals for dwellings for agriculture and forestry workers will be considered to be appropriate, and because a more specific policy could be too restrictive and would not allow for the proper consideration of proposals on their own merit.
- 11.300 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP57 is likely to have a significant positive effect on objective 12: **local character** as it sets out restrictive criteria relating to the limited circumstances in which permission will be granted for agricultural and forestry workers' dwellings in the green belt. As new accommodation is only permitted when all other alternatives are found to be not available, a minor positive effect is also likely on SA objective 11: **efficient use of land**. In addition, DLP57 is likely to have a minor positive effect on SA objective 9: **housing** as it could provide accommodation for agricultural and forestry workers close to their place of work. This in turn has a minor positive effect on SA objectives 1: **employment** and 2: **economic growth**. RA2 could have a minor positive effect on these two SA objectives because it would still provide for the development of dwellings for agricultural and forestry workers in the green belt; however there is uncertainty attached because applying more specific criteria could mean that a more limited number of proposals are approved. RA1 (no policy) would have negligible effects on all of the SA objectives as there would be no locally specific policy in the Plan, although national planning policy relating to development in the green belt would still apply.

Green Belt: Facilities for outdoor sport, outdoor recreation and cemeteries

- 11.301 Draft Policy DLP658: Facilities for Outdoor Sport, Outdoor Recreation and Cemeteries sets out the Council's approach to proposals for these types of facilities within the green belt. Two reasonable alternative options to this policy were identified:
 - RA1: Have no policy and rely on the NPPF.
 - RA2: The policy could be more specific.
- 11.302 The SA scores for DLP58 and the reasonable alternative options are shown in **Table 11.15** further ahead in this section. The SA findings for DLP63 are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

- 11.303 The Council has taken forward DLP58 instead of the alternative option because the NPPF does not include guidance on the circumstances in which proposals for outdoor sport, outdoor recreation and cemeteries will be considered to be appropriate and how they should be designed, and because a more specific policy could be too restrictive and would not allow for the proper consideration of proposals on their own merit.
- 11.304 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP58 is likely to have a significant positive effect on SA objective 12: **local character** as the primary aim of the DLP58 is to conserve the open character of Kirklees' green belt. The strict criteria to maintain the local character are also likely to have a minor positive effect on SA objective 5: **amenity**. Due to its stringent criteria, RA2 is likely to have significant positive effects on both of these objectives. In addition, DLP58 is likely to have a significant positive effect on SA objective 8: **recreation** because it provides for the development of sport and recreation facilities in the green belt, provided that certain criteria are met. This will help to ensure that such facilities are available for local people outside of the main urban areas, which also has a minor positive effect on SA objective 4: **health**. In contrast, RA2 is likely to result in

mixed effects (minor positive and minor negative) on both these objectives as the stringent criteria in relation to maintain local character could result in fewer proposals being approved. Under RA1 there would be no policy in the Local Plan which would specifically address facilities for outdoor sport, outdoor recreation and cemeteries in the green belt. Given that national planning policy relating to development in the green belt would still apply, a negligible rather than negative effect is likely for all of the SA objectives.

Green Belt: The extension and alteration or replacement of existing buildings

- 11.305 Draft Policy DLP59: The Extension, Alteration or Replacement of Existing Buildings sets out the Council's approach to these types of proposals in the green belt. Two reasonable alternative options to this policy were identified:
 - RA1: Have no policy and rely on the NPPF.
 - RA2: The policy could be more specific.
- 11.306 The SA scores for DLP59 and the reasonable alternative options are shown in **Table 11.15** further ahead in this section. The SA findings for DLP59 are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.307 The Council has taken forward DLP59 instead of the reasonable alternative option considered because the NPPF does not include guidance on the circumstances in which proposals for the extension and alteration or replacement of existing buildings in the green belt are appropriate, and because a more specific policy could be too restrictive and would not allow for the proper consideration of proposals on their own merit.
- 11.308 The SA findings support this decision, being more positive for the draft policy than for the reasonable alternative options. DLP59 is likely to have a significant positive effect on SA objective 12: local character as it seeks to maintain the quality of Kirklees' green belt by ensuring that proposals for extending or altering buildings take into account the existing scale, character and openness of the site. RA2 would involve identifying specific villages where infill development may not be inappropriate. While this could make it more likely that brownfield development proposals come forward in those areas, it may indicate that they would not be approved elsewhere, reducing the number of proposals elsewhere which may in fact have been appropriate. A mixed (minor positive and minor negative) effect is therefore likely. With regards to SA objective 9: housing, DLP59 is likely to have a minor negative effect as the criteria for extensions to existing buildings and replacement of existing buildings in the green belt could restrict alterations to residential properties. RA2 is even more prescriptive and is therefore likely to have a significant negative effect on this SA objective. Under RA1 there would be no policy in the Local Plan which would specifically address the extension and alteration or replacement of existing buildings in the greenbelt and instead there would be a reliance on the text of the NPPF. A negligible effect is therefore likely for all of the SA objectives.

Green Belt: Garden extensions

- 11.309 DLP60: Garden Extensions sets out the Council's approach to proposals for the change of use of land in the green belt to a domestic garden. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified.
- 11.310 The SA scores for DLP60 can be found in **Table 11.15** further ahead in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

Green Belt: Infilling and redevelopment of brownfield sites

- 11.311 Draft Policy DLP61: Infilling and Redevelopment of Brownfield Sites sets out the Council's approach to these types of proposals in the green belt and refers to the allocated site Land at Storthes Hall, Kirkburton, which is an existing brownfield site in the green belt. Three reasonable alternative options to this policy were identified:
 - RA1: Have no policy and rely on the NPPF.

- RA2: The policy could be more specific.
- RA3: There could be a policy that identifies specific villages where infill development may not be inappropriate.
- 11.312 The SA scores for DLP61 and the reasonable alternative options are shown in **Table 11.15** further ahead in this section. The SA findings for DLP61 are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

Reasons for selecting the Draft Policy

- 11.313 The Council has taken forward DLP61 instead of the reasonable alternative option considered because the NPPF does not include guidance on the circumstances in which infill development within brownfield sites in the green belt is appropriate, and because a more specific policy could be too restrictive and would not allow for the proper consideration of proposals on their own merit. Identifying specific villages where infill development may not be inappropriate could imply that those villages are sustainable locations to accommodate new development and again may not allow the consideration of proposals on their own merit.
- 11.314 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP61 is likely to have positive effects on SA objectives 11: Efficient use of land and 12: local character as it permits infilling and redevelopment of brownfield sites within the green belt provided that certain criteria are met. This will help to conserve and enhance the quality of the landscape by reducing pressure for greenfield development which could otherwise negatively affect the quality of the green belt. RA2 would have the same positive effects as DLP66; however the specific criteria could result in fewer such proposals being approved so a minor rather than significant positive effect is likely. Under RA1 there would be no policy in the Local Plan which would specifically address the infilling and redevelopment of brownfield sites in the green belt and instead there would be a reliance on the text of the NPPF; therefore a negligible effect is likely for all of the SA objectives. RA3 would involve identifying specific villages where infill development may not be inappropriate. While this could make it more likely that brownfield development proposals come forward in those areas, it may indicate that they would not be approved elsewhere, reducing the number of proposals elsewhere which may in fact have been appropriate. A mixed (minor positive and minor negative) effect is therefore likely for SA objectives 11 and 12.

Green Belt: The re-use and conversion of buildings

- 11.315 Draft Policy DLP62: The re-use and conversion of buildings sets out the Council's approach to these types of proposals in the Green Belt. Two reasonable alternative options to this policy were identified:
 - RA1: Have no policy and rely on the NPPF.
 - RA2: The policy could be more specific.
- 11.316 The SA scores for DLP62 and the reasonable alternative options are shown in **Table 11.15** further ahead in this section. The SA findings for DLP62 are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

- 11.317 The Council has taken forward DLP62 instead of the reasonable alternative options because RA1 would not provide enough clarity and RA2 could be too restrictive and may not allow the proper consideration of proposals on their own merits.
- 11.318 The SA findings support this decision, being more positive for the draft policy than for the alternative options. DLP62 would have significant positive effects on SA objectives 5: amenity, 11: efficient use of land and 12: local character because it seeks to protect and enhance the green belt by restricting proposals which would introduce inappropriate domestic or urban characteristics into the landscape and it makes specific reference to protecting residential amenity and encourages the conversion and re-use of buildings that are permanent and worthwhile. Minor positive effects are also likely in relation to SA objectives 13: cultural heritage and 17: waste

because of the criteria included in the policy. Under RA1 there would be no policy in the Local Plan which would specifically address the re-use and conversion of buildings in Kirklees. Instead there would be a reliance on the text of the NPPF. Given that national guidance and other relevant policies in the Local Plan will continue to apply, a negligible rather than negative effect is likely in relation to all of the SA objectives. RA2 would involve having a more prescriptive policy in the Local Plan, which would be likely to have the same benefits as DLP62 in relation to SA objectives 5, 11, 12 13 and 17. However, this approach would be inflexible and could be too restrictive, not allowing for the proper consideration of individual proposals on their own merits. This could result in proposals actually having negative effects and a mixed effect is therefore likely overall for those SA objectives.

Urban green space

- 11.319 DLP63: Urban Green Space sets out the Council's strategy for safeguarding areas of urban green space identified on the Policies Map. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified. The options for site allocations for urban green space have been subject to SA separately, as described in **Chapter 7** of this report.
- 11.320 The SA scores for DLP63 can be found in **Table 11.15** further ahead in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

Local green space

- 11.321 DLP64: Local Green Space sets out the Council's strategy for safeguarding areas of local green space identified on the Policies Map. No reasonable alternative options to the policy as set out in the Draft Local Plan were identified. The options for site allocations for local green space have been subject to SA separately, as described in **Chapter 7** of this report.
- 11.322 The SA scores for DLP64 can be found in **Table 11.15** further ahead in this section. The SA findings are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

New open space

- 11.323 Draft Policy DLP65: The re-use and conversion of buildings sets out the Council's approach to these types of proposals in the Green Belt. One reasonable alternative option to this policy was identified:
 - RA1: An alternative would be to continue the approach set out in UDP policy H18, requiring open space provision from residential proposals over a certain threshold.
- 11.324 The SA scores for DLP65 and the reasonable alternative option are shown in **Table 11.15** further ahead in this section. The SA findings for DLP65 are summarised below the table along with the SA findings for the other draft policies in the Open Land and Green Belt chapter of the Draft Local Plan.

- 11.325 The Council has taken forward DLP65 instead of the reasonable alternative option because RA1 would not provide enough clarity and RA2 could be too restrictive and may not allow the proper consideration of proposals on their own merits.
- 11.326 The SA findings support this decision, being more positive for the draft policy than for the alternative option. DLP65 would have significant positive effects on SA objectives 4: health, 8: recreation and 12: local character because providing new open space in Kirklees will encourage active outdoor recreation and enhance the setting of built development within the landscape. Minor positive effects are also likely in relation to SA objectives 14: biodiversity and 16: flood risk due to the wider benefits of open space. RA1 would involve having more of a prescriptive policy in the Local Plan which would still support the delivery of open spaces with the associated benefits; however it would not require all housing developments to provide open space and does not allow individual circumstances to be taken into account. A minor rather than significant positive effect is therefore likely in relation to SA objectives 4, 8 and 12 and potential but uncertain minor positive effects are identified for SA objectives 14 and 16.

Table 11.15: Summary of SA Scores for Draft Local Plan policies and reasonable alternatives relating to Open Land and Green Belt 11.327 The SA scores for the draft policies (DLP55-65) are shown in **bold**.

	DLP55	_	DLP56	_	2	DLP57	_	2	DLP58	_	2	P59	_	2	DLP60	DLP61		2	8	DLP62	_	2	DLP63	DLP64	DLP65	
SA objectives	Ы	RA1	占	RA1	RA2	占	RA1	RA2	ᆸ	RA1	RA2	DLP	RA1	RA2	占	占	RA1	RA2	RA3	占	RA1	RA2	占	占	占	RA1
1: Employment	0	0	+	0	+?	+	0	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2: Economic Growth	0	0	+	0	+?	+	0	+?	0	0	0	0	0	0	0	O	0	0	0	0	0	0	0	0	0	0
3: Education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4: Health	+	+?	0	0	0	0	0	0	+	0	+/-	0	0	0	0	0	0	0	0	0	0	0	+	+	++	+
5: Amenity	+	0	+	0	+/-	0	0	0	+	0	++	0	0	0	0	0	0	0	0	++	0	+/-	0	0	0	0
6: Access to Services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8: Recreation	+	0	0	0	0	0	0	0	++	0	+/-	0	0	0	0	0	0	0	0	0	0	0	++	++	++	+
9: Housing	-	-	0	0	0	+	0	+/-	0	0	0	-	0		-	o	0	0	0	+/	0	+/-	0	0	0	0
10: Transport	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11: Use of Land	+	+	0	0	0	+	0	+	0	0	0	0	0	0	0	++	0	+	+/-	++	0	+/-	+	+	0	0
12: Local Character	++	+	++	0	+/-	++	0	++	++	0	++	++	0	+/-	++	++	0	+	+/-	++	0	+/-	+	+	++	+
13: Historic Environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+/-	+	+	0	0
14: Biodiversity	+	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+?
15: Pollution	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16: Flooding	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+?	+/-	0	0	0	+	+	+	+?
17: Waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+?	+/-	+	0	+/-	0	0	0	0
18: Natural Resources	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19: Climate Change	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

SA findings for the draft policy in Chapter 17 of the Draft Local Plan

- 11.328 The differences between the SA findings for each draft policy and any alternative options were summarised above. This section summarises the likely effects of the draft policies as set out in Chapter 17 of the Draft Local Plan: Open Land and Green Belt.
- 11.329 The policies in this part of the Draft Local Plan would have broadly positive effects, particularly in relation to SA objective 12: **local character** because they seek to protect and enhance the green belt and prevent urban development intruding and affecting the character of open land. Protecting and enhancing open space provision, particularly through DLP63, DLP64 and DLP65, will help to improve the setting of built development within the landscape and will have wider benefits in relation to SA objectives 4: **health**, 8: **recreation**, 14: **biodiversity** and 16: **flooding**.
- 11.330 While some of the policies seeking to protect the green belt could restrict housing development and therefore would have minor negative effects on SA objectives 9: **housing**, the Local Plan still provides for housing in appropriate locations and these policies would prevent development that is inappropriate in terms of its location or scale.

12 Summary of SA Findings for the Draft Local Plan

Cumulative effects

- 12.1 Table 12.1 at the end of this section presents a summary of the SA scores for all of the policies in the Draft Local Plan (Strategy and Policies document), and Table 12.2 presents a summary of the SA scores for all of the sites that are included as allocations in the Draft Local Plan (Allocations and Designations document). This enables an assessment to be made of the likely significant effects of the emerging Local Plan as a whole on each of the SA objectives, i.e. an assessment of cumulative effects as required by the SEA Regulations.
- 12.2 Under each of the SA objectives below, consideration is also given to ways in which the effects of the Local Plan may be mitigated.
 - SA objective 1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible
- 12.3 The Local Plan provides for the creation of 32,194 jobs which will help to ensure that there are enough jobs available to match population growth that will result from the housing development also proposed through the Draft Local Plan.
- 12.4 Nineteen sites have been allocated in the Sites and Allocation document for employment development, which will increase the amount and range of sites that are available for employment-generating development in the District. In addition, 11 of the 12 mixed use sites that have been allocated would incorporate some employment-related development. These allocated sites have been subject to SA along with the reasonable alternative site options and the Council considers them to be the most appropriate sites for meeting local employment needs while minimising the potential adverse impacts of development.
- 12.5 Most of the allocated employment sites are in the northern half of Kirklees where the majority of the population is focussed and where there are generally good public transport links; however there are also some allocated employment sites further south which will ensure that employment delivery is not all focussed in one particular area.
- 12.6 The policy measures in the Draft Local Plan seeking to improve sustainable transport links in Kirklees, through improvements to the public transport network as well as walking and cycle routes, will help to ensure that people (including those without a car) are able to access employment opportunities throughout the District.
- 12.7 While the development of a large amount of employment land throughout the District could potentially result in the loss of greenfield land and environmental impacts including on the landscape, biodiversity and cultural heritage, there are a range of development management-style policies in the Draft Local Plan relating to these and other environmental issues that should help to mitigate the potential effects of development. In particular, DLP5: Efficient and Effective use of Land and Buildings, DLP25: Design, DLP31: Biodiversity and Geodiversity, DLP33: Landscape and DLP52: Protection and Improvement of Environmental Quality will all apply to new employment development on the allocated sites.
- 12.8 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on employment and access to jobs.
 - SA objective 2: Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship
- 12.9 The likely cumulative effects of the Draft Local Plan on the economy in Kirklees are similar to those described above in relation to employment, particularly because the allocation of 19 sites

- for employment development will make a significant contribution towards achieving economic growth. In addition, the other policies in the Economy section of the Draft Local Plan seek to safeguard existing employment sites in the Priority Employment Areas (DLP8), increase skill levels amongst local people (DLP9) and support economic growth in rural areas (DLP10).
- 12.10 As well as policies directly relating to economic growth, the policies in the Draft Local Plan seeking to reduce congestion and conserve and enhance the quality of the built and natural environment in Kirklees will indirectly support economic growth by making the District more attractive to investors and employers.
- 12.11 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on the economy.

SA objective 3: Ensure education facilities are available to all

- 12.12 The population growth that will result from the development of 1,630 new homes in Kirklees each year over the Draft Local Plan period could place pressure on existing schools. However, the Draft Local Plan makes provision for the development of new schools and additional school places to meet increased demand through DLP50: Education and Healthcare Needs. In addition, DLP3: Providing Infrastructure requires such essential infrastructure to be in place before the associated development comes forward.
- 12.13 All development sites that were considered for inclusion in the Draft Local Plan have been assessed in relation to their access to schools and colleges via sustainable modes of transport and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. The sites that have been allocated in the Draft Local Plan were found to have broadly very positive effects on access to education with the vast majority of the residential site allocations having either minor or significant positive effects.
- 12.14 The Draft Local Plan also includes a range of measures to protect and improve sustainable transport links in the District which will help to provide people with good access to schools and colleges, including those without a car.
- 12.15 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on access to education.

SA objective 4: Improve the health of local people and ensure that they can access the health and social care they need

- 12.16 The population growth that will result from the development of 1,630 new homes per year in Kirklees over the Draft Local Plan period could place pressure on existing healthcare facilities. However, the Draft Local Plan provides for the development of new healthcare facilities to meet increased demand through DLP50: Education and Healthcare Needs. As described above in relation to education, DLP3: Providing Infrastructure requires such essential infrastructure to be in place before the associated development comes forward.
- 12.17 The Local Plan strongly encourages modal shift and a move towards increased walking and cycling, by seeking to link strategic development sites with the walking and cycling network (DLP24: Core walking and cycling network) and a number of the criteria-based policies include requirements such as cycle storage within residential developments. This will help to increase levels of activity day to day and will therefore benefit health, as will the allocation of sites for urban and local green space throughout the District.
- 12.18 The Local Plan seeks to restrict concentrations of food and drink establishments in town centres (DLP16: Food and drink uses and the evening economy) which will help to encourage and facilitate healthier diets. Improvements to air quality resulting from sustainable transport measures and reduced congestion will also benefit public health.
- 12.19 All development sites that were considered for inclusion in the Draft Local Plan have been assessed in relation to their access to healthcare facilities via sustainable modes of transport and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. Most of the sites that have been allocated in the Draft Local Plan were found to have either minor or significant positive effects on access to healthcare. While a small number of sites are not as well-located in relation to existing healthcare facilities, the appraisal of site options

- could not take into account any new provision that may be made, as this has not been identified in the Draft Local Plan at this stage.
- 12.20 Overall, the Draft Local Plan is therefore considered to have a cumulative **minor positive** effect on health.

SA objective 5: Protect local amenity including avoiding noise and light pollution

- 12.21 The large amount of residential and employment development proposed through the Draft Local Plan could result in negative effects on amenity if noise and light pollution were to impact upon nearby sensitive receptors such as existing residential properties. However, such effects would be short-term during the construction phase and impacts may be able to be mitigated at least to some extent through the use of good practice construction techniques. In addition, a number of the criteria-based policies in the Draft Local Plan make specific reference to protecting local amenity, such as DLP15: Residential in Town Centres Policy, DLP25: Design, DLP55: Development in the Green Belt and a number of policies in the Minerals and Waste sections of the Draft Local Plan
- 12.22 In the longer term, the improvements that are proposed to the sustainable transport network and measures to encourage modal shift could reduce the noise and other amenity impacts associated with traffic and congestion.
- 12.23 All development sites that were considered for inclusion in the Draft Local Plan have been assessed in relation to their likely impacts on amenity and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. While minor and significant negative effects on amenity were identified in relation to most of the allocated sites (based on the assumptions that were applied in the appraisal), these effects may be able to be mitigated as described above and the alternative options considered would also have negative effects.
- 12.24 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor negative and minor positive)** effect on amenity, and the minor negative effect would be short-term.

SA objective 6: Retain and enhance access to local services and facilities

- 12.25 As described above in relation to education and health, the population growth that will result from the development of 1,630 new homes per year in Kirklees over the Draft Local Plan period could place pressure on existing services and facilities. However, the Draft Local Plan makes provision for the protection and enhancement of community services and facilities to address growing demand through DLP49: Community Services and Facilities, and DLP3: Providing Infrastructure requires such essential infrastructure to be in place before the associated development comes forward.
- 12.26 The spatial development strategy for the Draft Local Plan seeks to direct most development to the larger urban centres which will mean that people are more easily able to access the existing services and facilities that are concentrated there. However, it is recognised that this would result in the loss of opportunities that may otherwise exist to stimulate the provision of new services and facilities in other parts of the District.
- 12.27 All development sites that were considered for inclusion in the Draft Local Plan have been appraised in relation to their level of access to services and facilities and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. A mixture of positive and negative effects on access to services were identified in relation to the allocated sites (based on the assumptions that were applied in the appraisal), although the appraisal of site options could not take into account any new provision that may be made, as this has not been identified in the Draft Local Plan at this stage.
- 12.28 Improvements to the transport network, particularly sustainable transport links, will also provide improved access to services.
- 12.29 Overall, the Draft Local Plan is therefore considered to have a cumulative **minor positive** effect on access to services and facilities.

SA objective 7: Make our communities safer by reducing crime, anti-social behaviour and the fear of crime

- 12.30 Relatively few of the policies in the Draft Local Plan will have a direct effect on levels of crime and safety although DLP25: Design refers seeks to minimise the risk of crime through appropriate design and the policies relating to development at Huddersfield and Dewsbury town centres (DLP17 and DLP18) seek to create safe and welcoming destinations.
- 12.31 The effects of allocated sites on crime cannot be assessed at this stage as they will depend on factors such as the design of the development and the incorporation of lighting, rather than the location of sites. However, all development would be subject to the criterion included in DLP25: Design referred to above.
- 12.32 Overall, the Draft Local Plan is therefore considered to have a cumulative **negligible** effect on crime and safety.

SA objective 8: Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage

- 12.33 The Draft Local Plan makes significant provision for retaining and enhancing the amount of open space within Kirklees, in particular through the allocation of sites for urban and local green space. Those sites have been appraised in relation to their proximity to residential and employment development and all were found to be accessible from those areas.
- 12.34 Policies in the Health and Supporting Communities section of the Draft Local Plan seek to protect existing sport and recreation facilities and provide new facilities to support the growing population, in particular DLP58: Facilities for Outdoor Sport, Outdoor Recreation and Cemeteries. In addition, some of the sustainable transport measures in the Draft Local Plan can have benefits in terms of recreation, in particular measures to enhance the network of walking and cycling routes (DLP24: Core Walking and Cycling Network).
- 12.35 The residential, employment, mixed use and Traveller sites that were considered for inclusion in the Draft Local Plan have been appraised in relation to their access to recreation facilities and open space and the SA findings have been taken into account by the Council in identifying the sites that are now allocated. Almost all of the allocated residential and Traveller sites would have significant positive effects on access to recreation, although in many cases this was part of a mixed effect overall due to a feature such as a Public Right of Way being included in the site boundary. If these features are retained as part of the developments, there would be no negative effect associated with their loss.
- 12.36 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on access to recreation facilities and open space.

SA objective 9: Ensure all people are able to live in a decent home which meets their needs

- 12.37 The Local Plan provides for the development of 1,630 new homes per year in Kirklees to meet the objectively assessed housing need determined through the Strategic Housing Market Assessment. This figure is balanced with the planned level of employment growth to avoid a situation of over or under-delivery of housing.
- 12.38 A total of 194 sites have been allocated in the Allocations and Designations document for residential development. These sites have been subject to SA along with 665 reasonable alternative options and the Council considers them to be the most appropriate sites for meeting housing needs while minimising the potential adverse impacts of development. In addition, some housing will be delivered on the allocated mixed use sites, and two Traveller sites have been allocated to meet their specific housing need.
- 12.39 The Housing policies in the Draft Local Plan seek to ensure that a range of housing types is provided as well as an appropriate level of affordable housing (DLP11: Affordability and Mix of Housing). This will help to ensure that the development of new homes meets specific local needs. Provision is also made for Traveller sites (DLP12: Accommodation for Travellers). The Draft Local Plan includes a number of development management-style policies seeking to ensure that all new

- development is of high quality design and construction, in particular DLP25: Design. This will help to ensure that new housing is of decent quality.
- 12.40 While some of the policies seeking to protect the green belt, employment land, waste facilities etc. could potentially restrict housing development, enough land is still allocated in the Draft Local Plan to meet the objectively assessed housing need.
- 12.41 While a large amount of residential development throughout the District could potentially result in the loss of greenfield land and impacts on the landscape, biodiversity and cultural heritage there are a range of development management-style policies in the Draft Local Plan relating to these and other environmental issues that should help to mitigate the potential effects of development. In particular, DLP5: Efficient and Effective use of Land and Buildings, DLP25: Design, DLP31: Biodiversity and Geodiversity, DLP33: Landscape and DLP52: Protection and Improvement of Environmental Quality will all apply to new employment development on the allocated sites.
- 12.42 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on housing.
 - SA objective 10: Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport
- 12.43 The Draft Local Plan includes a number of policies seeking to improve sustainable transport links in Kirklees. While some policies would improve the highway network (in particular DLP19: Strategic Transport Infrastructure), which could be seen to encourage and facilitate car use, they are underpinned by the wider aim to encourage sustainable transport use. Several policies in the Draft Local Plan also make reference to improving road safety including DLP13: Town Centre Uses, DLP15: Residential in Town Centres Policy and DLP23: Highways and Access.
- 12.44 The spatial development strategy seeks to direct most development to the larger urban areas where public transport links are relatively good and where there will be opportunities to walk and cycle day to day. The residential and employment site allocations set out in the Allocations and Designations document have been appraised in relation to the extent to which they allow for the use of sustainable transport and most were found to have either minor or significant positive effects.
- 12.45 Overall, the Draft Local Plan is therefore considered to have a cumulative **significant positive** effect on sustainable transport.

SA objective 11: Secure the efficient and prudent use of land

- 12.46 The Draft Local Plan seeks to direct development towards brownfield land use where possible, particularly DLP6: Efficient and Effective use of Land and Buildings. While the Draft Local Plan does not set a particular target for the amount of development on brownfield land, this approach may not be deliverable due to the relatively low availability of brownfield sites in the District historically.
- 12.47 Focussing town centre and retail uses in the identified town centre and shopping areas (DLP13: Town Centre Uses and DLP14: Shopping Frontages) will help to avoid development on out of centre greenfield sites.
- 12.48 The large amount of housing and employment development proposed through the Draft Local Plan will inevitably result in the loss of greenfield land, particularly because most of the allocated sites are on greenfield land. In addition, a number of the allocated sites could have significant negative effects on this SA objective due to the loss of higher grade agricultural land that would occur.
- 12.49 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and significant negative)** effect on the efficient use of land.

SA objective 12: Protect and enhance the character of Kirklees and the quality of the landscape and townscape

12.50 The large amount of residential and employment development that will result from the Draft Local Plan could impact upon the landscape character in Kirklees, particularly near sensitive areas including the Peak District National Park in the south.

- 12.51 However, the allocated development sites have all been assessed for their likely effects on the landscape. A small number of allocated housing and employment sites are within approximately 500m of the National Park and it will be important to ensure that their design and layout is appropriate to avoid adverse impacts on that nationally protected landscape.
- 12.52 All potential negative effects are uncertain at this strategic level of assessment as they will depend largely on the design and layout of development and the incorporation of mitigation such as screening. There is significant mitigation for landscape-related impacts built into the Draft Local Plan, including through DLP33: Landscape and relevant criteria in a number of the more subject-specific policies. In addition, policies in the Draft Local Plan seeking to achieve high quality design in all development (DLP25: Design) will ensure that new development conserves and enhances the townscape.
- 12.53 The Draft Local Plan also allocates sites for open space (urban and local green space) which will help to conserve and enhance the setting of built development and its appearance in the wider landscape and townscape.
- 12.54 Overall, the Draft Local Plan is therefore considered to have a cumulative **minor negative** effect on the landscape and townscape although this is **uncertain** until detailed proposals for the allocated sites are known, and it is recognised that the Draft Local Plan includes several policies that should help to ensure that appropriate design measures are incorporated into new developments.

SA objective 13: Conserve and enhance the historic environment, heritage assets and their settings

- 12.55 The large amount of residential, employment and other development proposed through the Draft Local Plan could have negative effects on heritage assets and their settings, including the listed buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas which are distributed broadly throughout the District.
- 12.56 The allocated sites have all been assessed for their likely effects on the historic environment, with judgements about the likelihood of effects being taken directly from information provided to Kirklees Council from Historic England. Only a small number of the allocated sites were found to have potential minor negative effects, with no significant negative effects identified.
- 12.57 All potential negative effects resulting from development are uncertain at this strategic level of assessment as they will depend largely on the design of development and the materials used. There is significant mitigation for impacts on cultural heritage built into the Draft Local Plan, including through DLP36: Historic Environment and relevant criteria in a number of the more subject-specific policies. In addition, policies in the Draft Local Plan seeking to achieve high quality design in all development (DLP25: Design) will ensure that new development conserves and enhances the setting of nearby heritage assets. New high quality development can have positive effects on heritage assets and their settings by improving the appearance of the built environment and townscape.
- 12.58 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on the historic environment and the minor negative effect is currently **uncertain** until detailed proposals for the allocated sites are known.

SA objective 14: Maximise opportunities to protect and enhance biodiversity and geodiversity

- 12.59 The large amount of residential and employment development that will result from the Draft Local Plan could impact upon sensitive biodiversity and geodiversity in the District as a result of habitat loss, direct disturbance or indirect disturbance from air noise, light or water pollution. In particular, the sensitive European sites (South Pennine Moors SPA and SAC) in the south west of the District could be adversely affected by development in that area.
- 12.60 The allocated sites have all been assessed for their likely effects on biodiversity and geodiversity. While a number of sites have been identified as having potential negative effects, this is purely based on their proximity to biodiversity and geodiversity designations at this strategic level of assessment and it may be possible to implement mitigation measures that reduce or avoid these

- effects. The findings of the Habitats Regulations Assessment, which is being undertaken separately, will also be taken into account.
- 12.61 All potential negative effects are uncertain at this strategic level of assessment as they will depend largely on the design of development and the incorporation of mitigation such as green infrastructure. There is significant mitigation for biodiversity-related impacts built into the Draft Local Plan, including through DLP31: Biodiversity and Geodiversity and through relevant criteria in a number of the more subject-specific policies.
- 12.62 The Local Plan also allocates sites for open space (urban and local green space) which will help to provide habitat and avoid habitat fragmentation as a result of extensive development in Kirklees.
- 12.63 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on biodiversity and geodiversity and the minor negative effect is currently **uncertain** until detailed proposals for the allocated sites are known.

SA objective 15: Reduce air, water and soil pollution

- 12.64 The large amount of development proposed through the Draft Local Plan could result in air pollution from increased vehicle traffic; however as described above under SA objective 10, the Draft Local Plan includes various policies and measures seeking to reduce car use and provide improved opportunities for walking and cycling. In particular, DLP24: Core Walking and Cycling Network seeks to ensure that developments are linked to the walking and cycle network.
- 12.65 DLP51: Protection and Improvement of Local Air Quality specifically seeks to address this issue and DLP35: Conserving and Enhancing the Water Environment should help to mitigate the potential impacts of development on water quality. DLP3: Providing Infrastructure will ensure that the infrastructure required to support new development, including improvements to wastewater treatment works, will be in place before the development proceeds.
- 12.66 Overall, the Draft Local Plan is therefore considered to have a cumulative **negligible** effect on air, water and soil quality.
 - SA objective 16: Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people
- 12.67 The large amount of development proposed through the Draft Local Plan could increase flood risk as a result of the loss of greenfield land to impermeable surfaces and therefore increased runoff and reduced infiltration. The allocated sites have been assessed in relation to their effects on flood risk. The earlier SA work recommended that a number of sites in high flood risk zones should not be allocated if the sequential test set out in national planning practice guidance could not be met (i.e. that there are other suitable sites in lower flood risk zones). None of these recommended sites have been allocated on in the Draft Local Plan.
- 12.68 The Draft Local Plan seeks to reduce the risk of flooding through DLP28: Flood Risk which directs development to the areas at lowest risk from flooding and requires the use of SuDS, and DLP29: Drainage. In addition, the allocation of local and urban green space will help to mitigate flood risk by maintaining areas of permeable land. A number of the criteria-based policies also make reference to reducing flood risk and incorporating SuDS including DLP23: Highways and Access.
- 12.69 However, due to the numerous minor negative effects identified in relation to the allocated housing, mixed use and employment sites, the Draft Local Plan is considered to have a cumulative **minor negative** effect on flood risk.

SA objective 17: Increase prevention, re-use, recovery and recycling of waste close to source

12.70 The scale of development proposed through the Draft Local Plan will inevitably result in an increase in waste generation in Kirklees, particularly because many of the sites allocated for development are on greenfield land where there may be limited opportunities to reuse existing buildings and materials. However, effects in terms of levels of recycling will depend on onsite waste management practices which cannot be determined at this stage.

- 12.71 The policies in the Waste section of the Draft Local Plan provide for the retention of waste facilities to enable waste to be managed locally, reducing the need to export waste over longer distances, and also encourage waste to be managed in accordance with the waste hierarchy. DLP25: Design also requires development proposals to incorporate adequate facilities to allow occupiers to separate and store waste for recycling and recovery.
- 12.72 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on waste.

SA objective 18: Increase efficiency in water, energy and raw material use

- 12.73 The scale of development proposed through the Draft Local Plan means that an increase in the consumption of energy, water, minerals and other natural resources is inevitably expected. This is not influenced by the location of allocated development sites, but by onsite practices used which cannot be known at this stage. However, the Draft Local Plan seeks to promote efficient energy consumption by supporting renewable energy development in appropriate locations (DLP27: Renewable and Low Carbon Energy). In addition, DLP35: Conserving and Enhancing the Water Environment requires developments to manage water demand and improve water efficiency through appropriate water conservation techniques including rainwater harvesting and grey-water recycling. The minerals policies in the Draft Local Plan seek to safeguard minerals resources and avoid sterilisation.
- 12.74 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on the efficient use of water, energy and raw materials.

SA objective 19: Reduce the contribution that the District makes to climate change

- 12.75 An overall increase in greenhouse gas emissions from vehicle traffic and commercial activity will inevitably result from the overall scale of employment and residential development proposed through the Draft Local Plan. However, the Draft Local Plan includes a number of policies which seek to mitigate the potential impacts of increased vehicle traffic on local roads, in particular DLP20: Sustainable Travel and Demand Management and DLP24: Core Walking and Cycle Network. These policies should help to ensure that emissions from increased traffic are minimised and that opportunities to make use of walking, cycling and public transport are higher. The allocated sites have been assessed in relation to their impacts on sustainable transport use, as described under SA objective 10 above.
- 12.76 The Draft Local Plan provides support for appropriate renewable energy development through DLP27: Renewable and Low Carbon Energy, and criteria that encourage actions to mitigate climate change are featured in several of the criteria-based policies.
- 12.77 Overall, the Draft Local Plan is therefore considered to have a cumulative **mixed (minor positive and minor negative)** effect on climate change.

Table 12.1: SA Scores for Draft Local Plan Policies

	1: Employment	2: Economic Growth	3: Education	4: Health	5: Amenity	6: Access to Services	7: Crime	8: Recreation	9: Housing	10: Transport	11: Use of Land	12: Local Character	13: Historic	14: Biodiversity	15: Pollution	16: Flooding	17: Waste	18: Natural Resources	19: Climate Change
Spatial Development Strategy	+?	0	?	?	?	?	0	?	0	+?	+?	+?	+?	+?	0	+?	0	0	+?
DLP1	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
DLP2	++?	+	+	+	+/-	+	0	+	++	++	+	+	-?	0	+	+?	0	0	+
DLP3	++	++	++	++	0	++	0	++	0	++	0	0	0	0	++	++	0	0	+
DLP4	+	+	+	+	0	+	0	+	++	++	0	++	++	++	+	+	0	+	++
DLP5	++?	++?	0	0	0	0	0	0	++?	0	0	0	0	0	0	0	0	0	0
DLP6	0	0	0	0	0	0	0	0	++	+	++	++	0	+	+	+	+	+	+
DLP7	+	+	+	++	0	+	+	0	+	++	0	++	+?	0	+	0	0	0	+
Employment provision	+	++	0	0	-?	0	0	0	+?	+?	-?	-?	-?	-?	+/-?	+/-?	0	0	+/-?
DLP8	++	++	0	0	0	-?	0	0	-?	+	0	0	0	0	+	0	0	0	+
DLP9	++	++	++	+	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0
DLP10	++	++	0	0	0	+?	0	0	0	+	+	+	0	0	+	+	+	0	+
Housing	+	+	0	0	-?	+/-?	0	+/-	++	+?	-?	-?	-?	-?	+/-?	+/-?	0	0	+/-?
provision DLP11								?											
DLP11 DLP12	0	0	0	0	0	0	0	0	++	0	0	?	0	0	0	0	0	0	0
DLP12 DLP13	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0
DLP13	+	++	0	+	0	++	0	0	0	++	+	+	+	0	+	0	0	0	+
DLP15	+	++	0	0	0	++	0	0	0	+	+	+	0	0	+	0	0	0	+
DLP16	+	+	0	0	+	+	0	0	0	+	+ 0	+	0	0	+	0	+	0	+
DLP17	+	++	+	+	0	+	+	+	+	++	0	+	+	0	+/-	-?	0	0	+
DLP18	+	++	0	+	0	+	+	+	+	++	0	+	+	0	+/-	-: -?	0	0	+
DLP19	+	++	0	+	+	0	0	0	0	++/-	0	0	0	0	+	0	0	0	+/-
DLP20	++	+	+	++	+	+	0	+?	0	++	0	0	0	0	++	0	0	0	++
DLP21	+	+	+	++	+	+	+	+?	0	++/-	+	0	0	0	+	+	0	0	+/-
DLP22	+	+	0	+	+	++	0	0	0	++	0	0	0	+	+	0	0	0	+
DLP23	++	+	+	+	+/-	+	0	+	0	++/-	0	0	0	0	++/-	0	0	0	++/-
DLP24	+	0	+	++	0	+	0	++	0	++	0	0	0	0	+	0	0	0	+
DLP25	+	0	0	+	+	0	+	+	++	+	0	++	+	++	+	+	+	+	++
DLP26	0	+	0	0	0	0	0	0	0	0	0	++	++	0	0	0	0	0	0
DLP27	0	0	0	0	+?	0	0	0	0	0	0	+?	+?	+?	+	0	0	++	++
DLP28	0	+	+	+	0	+	0	+?	+	+	0	+?	+	+?	+	++	0	0	0
DLP29	0	0	0	+	0	0	0	0	0	0	0	0	0	+	++	++	0	0	0
DLP30	0	0	0	+	0	0	0	+	0	0	0	+	0	++	+	++	0	0	0
DLP31	-?	-?	0	0	0	0	0	0	-?	0	+?	+?	0	++	0	+?	0	0	0
DLP32	0	0	0	+	0	0	0	++	0	+	0	++	+	++	+	+	0	0	+
DLP33 DLP34	0	0	0	0	0	0	0	0	0	0	0	++	+	0	0	0	0	0	0
DLP34 DLP35	0	0	0	0	0	0	0	0	0	0	0	+	0	++	0	0	0	0	+
DLP35 DLP36	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	++	+	0	++
DLP30 DLP37	0	0	0	0	0	0	0	0	0	0	0	++	++	0	0	0	0	0	+?
DLP37	0	0	0	+	0	0	0	+	0	0	+	+	+	+	+	+	0	0	0
DLP39	0	0	+ 0	0	0	0	0	0	0 -?	0	0	0	0	0	0	0	0	0 + +	0
DLP40	+/-?	+/-?	0	0	0	0	0	0	-? -?	0	0	0	0	0	+	0	0	0	+
DLP41	+/-!	+/-!	0	0	0	0	0	0	- <i>?</i>	0	0	0	0	0	0	0	0	0	0
DLP42	0	0	0	0	+	0	0	0	0	0	0	+	+	+	+	0	0	0	0
	U	U	U	U		0	0	0	0	J	U					U	U	U	J

	1: Employment	2: Economic Growth	3: Education	4: Health	5: Amenity	6: Access to Services	7: Crime	8: Recreation	9: Housing	10: Transport	11: Use of Land	12: Local Character	13: Historic	14: Biodiversity	15: Pollution	16: Flooding	17: Waste	18: Natural Resources	19: Climate Change
DLP44	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0	++	+	++
DLP45	0	0	0	+	++	0	0	0	0	0	+	+	+	+	++	+	+	0	+
DLP46	-?	-?	0	0	0	0	0	0	-?	0	0	0	0	0	+	0	++	0	+
DLP47	0	0	0	0	0	0	0	0	0	0	0	-?	0	0	0	0	+	0	0
DLP48	+	0	+	++	+	+	+	++	0	++	0	0	0	+	++	+	0	0	+
DLP49	0	0	++	++	0	++	0	++	0	0	0	0	0	0	+	0	0	0	+
DLP50	0	0	++	++	0	0	0	0	0	+	0	0	0	0	+	0	0	0	+
DLP51	0	0	0	+	0	0	0	0	0	++	0	0	0	+	++	0	0	0	+
DLP52	0	0	0	+	++	0	0	0	0	+	0	0	0	+	++	0	0	0	+
DLP53	0	0	0	++	0	0	0	0	+	0	0	0	0	+	++	0	0	0	0
DLP54	0	0	0	++	0	++	0	++	0	0	0	0	0	0	0	+	0	0	0
DLP55	0	0	0	+	+	0	0	+	-	0	+	++	0	+	0	+	0	0	0
DLP56	+	+	0	0	+	0	0	0	0	0	0	++	0	0	0	0	0	0	0
DLP57	+	+	0	0	0	0	0	0	+	0	+	++	0	0	0	0	0	0	0
DLP58	0	0	0	+	+	0	0	++	0	0	0	++	0	0	0	0	0	0	0
DLP59	0	0	0	0	0	0	0	0	-	0	0	++	0	0	0	0	0	0	0
DLP60	0	0	0	0	0	0	0	0	-	0	0	++	0	0	0	0	0	0	0
DLP61	0	0	0	0	0	0	0	0	0	0	++	++	0	0	0	+	+	0	0
DLP62	0	0	0	0	++	0	0	0	+/-	0	++	++	+	0	0	0	+	0	0
DLP63	0	0	0	+	0	0	0	++	0	0	+	+	+	+	0	+	0	0	0
DLP64	0	0	0	+	0	0	0	++	0	0	+	+	+	+	0	+	0	0	0
DLP65	0	0	0	++	0	0	0	++	0	0	0	++	0	+	0	+	0	0	0

Table 12.2: SA scores for the Allocated Sites SA objectives Services and Facilities Environment and change o land use Sustainable Biodiversity **Employment** Landscape Recreation Efficient | Flooding Economy Education Historic Pollution Efficient Climate peodiversity Amenity Housing Waste Health Crime ransport naterials Site ö ~ 4 2 9: 7 ... ö 6 3 option à ö Residential Sites Н8 0 0? 0 0 Ω H11 0 ++/--? -? 0 0? 0 0 H29 ++? -? -? 0 0 ++/--? ++ 0? 0 0 ++ H31 -? ? -? 0 0 0 0 H32 0 0 -? ? -? 0 0 ++? H36 0 +? 0 0 -? 0? 0? 0 0 H38 +? 0 0 0 ++/--? 0? -? 0 0 ++?/ +/-+/--? -? ++ 0 0 ++ 0? 0 _ 0 ++ H39 +? + + /0 +? 0 0 -? ? --? 0 0 -++ -H40 0? H44 0 0 0 0 0 0 H47 -? 0 0 0? 0? 0 0 +? 0 +? H48 0 0 +? 0? 0 0 0 H50 ++? +/-0 0 +? 0? 0? 0 0 0 ++ 0 +? H52 0 0 0? 0? 0 0 ++ ++?/ 0/-0 0 ? -? 0 0 H67 0? H70 -? -? 0 ++? 0 0 0? 0 0 ++ H85 0 +? 0? -? 0 0 0 0 0 ++/--? ++ +? ++ H87 0 +/-0 0 -? 0? 0 ++? ++ H94 0 0 0 0 ++/--? -? 0? 0 H95 ++/--? 0 0 ? 0? 0 0 ++/ ++?/ --? 0 ++/--? ? ++/+ ++/0 0 ++ -? 0 0 ++ H101 +? H102 -? ? 0 0 0 0 0 0 +? H116 0 -? ? -? 0 0 0 0 ++ H120 0 0 +? -? -? 0 0 0 H121 +? -? 0 0 0? 0? 0 0 H124 0 0 -? 0? 0? 0 0 ++ ++?/ --? --? 0 ++/--? 0 ++ 0? 0 0 ++ H129 +? H130 0 0 +? O -? ? 0 0 0 + H134 0 ++? 0 ++/--? -? 0? 0? 0 0 H138 0 0 0? 0? 0 0 H145 0 ++? 0 0 0? 0? 0 0 0 H161 0 0 ++/--? 0? 0? 0 0 H162 0 0 ++/--? -? 0? 0? 0 0 ? H172 0 0 0 0? 0 0 0 H173 -? 0? 0 0 0 0? 0 0 ++ +? H174 +? 0 0 0 0? 0 0 0 H178 0 0 -? 0? 0 0 ++?/ ++/ 0 0 +/0 +? 0? -? 0 0 0 ++ ++ H192 +? H197 ++ 0 ++? 0 0 0 -? 0? -? 0 Ω ++ H198 +? ++/--? -? ? 0? ++ 0 0 0 0 0 ++ H199 ? 0 -? Ω O 0 0 ++? -++ H200 0 0 0? -? 0 0 +? + H201 0 +? 0 -? 0? 0 0 H202 0 0 0 0 ? H203 0 0 0? 0 0 0 H205 -? 0? 0 0 0 0 H206 ++? 0 0 0 -? 0? 0? 0 0 0 ++

0 ++/--?

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++

++?

0

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H213

H214

HEID OF DEPTH STATE OF THE PROPERTY OF THE PRO										SA c	bjecti	ves								
H215							Services								Biodiversity diversity		.9	I7: Waste	Efficient use erials	
High D	H215												-?	?		0				
Higher 1470	H216		0				_					+	+?		-?	0	0	+?	0	
	H218	+/0	0		+/0		0/-	0	++/?	+		_		?	0?	0	-	-	0	
	H221	+	0	++?	+		+	0		+	++	_	-?	?	?	0	-	-	0	++
H222		++	0		+/0		+ + /0	Ω	++/?	++	++		2	02	2	0	_		0	++
HIZ25		**			+70		++70		++/:	+ +						Ш				
H233		_										_					0	_		
HZ69												_					_	_		
HZ70 HZ76			_									_								
H276												_						_		
H277 H278 H278 H278 H278 H279 H288 H289 0	H276						_											_		
H278 H284 D H284	H277																	_		
H284	H278									+		_						_		
H294	H284	-	0	++?/	+/-	-	+/-	0	++	+	+	-	-?	0?	-?	0	-	-	0	
H303	H294	0/	0		+	-	-	0	++	+	+	-	-?	?	-?	0	-	-	0	+
H313	H303					-	+					-	-?	0?	0?		-	-		
H323	H307	++	0	?		-		0	++	+		_	-?	?	0?	0	-	-	0	
H333	H313	++	0	++?	+/0		+/-	0	++	+	++	-	-?	?	?	0	0	-	0	++
H334		++	0		++/+		+/-	0	++	+	++	-		0?	-?	0	-	-	0	++
H334	H333	++	0		0	-	+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H339	H334	++	0		+/0	-	+/-	0	++	++	++		?	?	?	0	-	-	0	++
H342						-	-		++	+	+	-					-	-		+
H343		+				_	-					_					-	_		
H345		-				_						_						_		
H356						_						_					_	_		
H356 - 0 ++? + - + 0 ++/-? + + +? ? ? -? 0 0 ++ H358 ++ 0 +? + - +/0 0 ++/-? + + +? 0? 0? 0? 0 0 ++ H367 ++ 0 +? + - 0 0 ++/-? + + + + + + ? 0? 0? 0? 0 0 0 +? 0 ++ H439 0 0 0 +? + - + 0 ++/-? + + +? 0? 0? 0? 0 0 0 +? 0 ++ H455 ++ 0 ++? + - + 0 ++/-? ++ + +? 0? 0? 0? 0 0 ++ H455 ++ 0 ++? + - + 0 ++/-? ++ + +? 0? -? 0 0 ++ H471 ++ 0 ++? + - + 0 ++/-? ++ + +? 0? -? 0 0 ++ H481 0 0 0 ++? + - + 0 ++ + + + + + +? 0? -? 0 0 0 ++ H489 ++ 0 ++? + - + 0 ++ + + + + + + + +? 0? -? 0 0 0 ++ H498 ++ 0 ++? + - + 0 ++/-? ++ + + + + +? 0? -? 0 0 0 ++ H498 ++ 0 ++? + - + 0 ++/-? + + + + + + +? 0? -? 0 0 0 ++ H502 ++ 0 ++? + - + 0 ++/-? + + + + + +? 0? -? 0 0 0 ++ H508 ++ 0 ++? + - + 0 ++/-? + + + + + +? 0? -? 0 0 0 ++ H509 ++ 0 ++? + - + 0 ++/-? + + + + + +? 0? -? 0 0 0 ++ H519 +0 ++?/+2 + - + 0 ++/-? ++ + + +? 0? -? 0 0 0 ++ H519 +0 ++?/+2 + - + 0 ++/-? ++ + + +? 0? -? 0 0 0 ++ H538 0 0 0 +? + - + 0 ++/-? ++ + + +? 0? 0? -? 0 0 ++ H538 0 0 0 +? + - + 0 ++/-? ++ + +? 0? 0? 0? 0? 0 0 ++ H551 + 0 0 0 +? + - + 0 ++/-? + + +? 0? 0? 0? 0? 0 0 ++ H555 0 0 0 +? + - + 0 ++/-? + + +? 0? 0? 0? 0? 0 0 ++ H555 0 0 0 +? + - + 0 ++/-? + + +? 0? 0? 0? 0? 0 0 ++ H555 0 0 0 +? + - + 0 ++/-? + + +? 0? 0? 0? 0? 0 0 ++ H555 0 0 0 +? + - + 0 ++/-? + + +? 0? 0? 0? 0? 0 0 ++ H555		++/		++?/-																
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H367						_					_	_								
H439 O O +? +	H367	_				_												_		
H454	H439					_						_						_		
H471	H454	++	0				_	0				-	-?	0?	-?	0	-	-	0	
H481	H455	++	0	++?	+	-	+	0	++/?	++	++		?	0?	?	0	-	-	0	++
H489 H40 H498 H40 H498 H40 H47 H498 H40 H502 H40 H502 H40 H508 H40 H508 H40 H40 H509 H40 H40 H509 H40 H40 H40 H40 H40 H40 H40 H	H471				+	-	++		++	+	++	-						_		++
H498	H481					_						_						_		
H502						_						_								
H508 ++ 0 ++? +/0 +/0 0 ++/? + ++? ? -? 0 0 ++ H509 ++ 0 ++?/ + + 0?/++ + ++? 0? -? 0 0 ++ H518 0 0 ++? + - + 0 ++/? ++ ++ ++ -? 0? -? 0 0 0 ++ H519 + 0 ++?/ 0 0 ++/? ++ +? 0? -? 0 0 0 + H527 ++ 0 ++? +- + 0 ++ ++ ++ +? 0? 0? 0? 0 0 +? 0 ++ H538 0 0 ++? +- + 0 ++ ++ ++? 0? 0? 0? 0 0 0 +? 0 ++ H549 0 0 0 +? + + 0 ++ ++ ++? 0? 0? 0? 0 0 ++ H550 0 0 0 +? + + 0 ++/? ++ +? 0? 0? 0? 0 0 ++ H551 + 0 +? +- + 0 ++/? ++ ++? 0? 0? 0? 0 0 ++ H555 0 0 ++? +- + 0 ++/? ++ ++? 0? 0? 0? 0 0 ++ H564 ++/ 0 +? +- + 0 ++/? ++ ++? 0? 0? 0? 0 0 ++		_				_												_		
H509	H502		_								_		_					_		
H518				++?/																
H519		0	0		1		4	Ω	4-4	_	+ +	_	+2	2	-2	Ω	O		Ω	++
H527				++?/																
H538		, ,	0					0					. 2	02	02	0	0	, 2	0	4.1
H549						_						_						_		
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	H567	++	0	0?	0		0	0	++	+	+	-	-?	?	0?	0	-	-	0	+

									SA c	bjecti	ves								
Site	Employment	Economy	Education	Health	Amenity	Services and Facilities	Crime	Recreation	Housing	10: Sustainable Transport	11: Efficient land use	2: Landscape	3: Historic Environment	14: Biodiversity and geodiversity	5: Pollution	6: Flooding	17: Waste	18: Efficient use of materials	9: Climate change
option H583		2:	.: .:	4	5.	9:	7.	ώ	9.										_
H584	++	0	+?	+	-	-	0	++	+	++	-	-? -?	0? ?	-? -?	0	-	-	0	++
H591		0	++?	+/ 0/+			0	++	+		-	-? -?	?	-? -?	0	-	-	0	
H601	++	0	++?	+	-	+/- 0	0	++/?	+	++	-	-? -?	9?	- : -?	0	-	-	0	++
H609	++	0	+?	+	-	+	0	++/!	+	++		-: -?	0?	-: -?	0	-	-	0	++
H612	++	0	++?	++		0	0	++	+	++	-	-?	0?	0?	0			0	++
H616	++	0	+?	+		++	0	++/?	+	++	-	-?	0?	?	0	-	-	0	++
H623	++	0	++?	++	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H626		0	+?	-	-	-	0	++	+	+	-	-?	0?	?	0	-	-	0	+
H633	+	0	+?	++/+		+	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H634	0	0	0?	+		-	0	++	+	+	-	-?	0?	-?	0		-	0	+
H638	+	0	+?	+	-	0	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H652	++/	0	+?/0?	+		+/-	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H659	++	0	++?	+	-	+	0	++	++	++		?	?	?	0	-	-	0	++
H660	+	0	+?	+	-	0	0	++	+	++	-	-?	?	?	0	-	-	0	++
H662	++	0	++?	++	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H664	+/	0	++?/-· ?	+/	-	+/	0	++	+	+	-	-?	?	?	0	-	-	0	+
H684	++	0	+?	+		0	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H688	++	0	++?	+		+	0	++/?	++	++		?	?	?	0	-	-	0	++
H689	++	0	++?	+		+	0	++	+	++	-	-?	?	0?	0		_	0	++
H690	++	0	++?/ +?	+	-	+	0	++/?	+	++	-	-?	?	0?	0	-	-	0	++
H701	+	0	++?	+		++	0	++	+	++	-	-?	?	-?	0			0	++
H706	++	0	++?/ +?	++		+	0	++/?	++	++		?	?	-?	0	-	-	0	++
H708	+	0	++?	+		+	0	++/?	+	++	-	-?	?	0?	0	-	-	0	++
H712	0	0	++?	+	-	+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H715	0	0	+?	+	-	-	0	++	+	+	-	-?	?	-?	0	-	-	0	+
H727	0	0	++?	+		+	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H728	0/-	0	++?/ +?	+	-	0	0	++	++	++		?	0?	-?	0	-	-	0	++
H729	0	0	++?	+/0	-	0	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
H730	0	0	++?	0	-	+	0	++/?	+	++	-	-?	?	0?	0	-	-	0	++
H734	++	0	++?/ +?	++/0		+/0	0	++/?	++	++		?	0?	-?	0	-	-	0	++
H737	0	0	+?	+	-	0	0	++	+	+	-	-?	0?	-?	0	-	-	0	+
H738	-	0	+?	+	-	+	0	++	+	++	-	-?	?	-?	0	-	-	0	++
H754	+	0	++?	++		+	0	++	+	++	-	-?	0?	-?	0	-	-	0	++
H755 H756	+	0	+?	+		0	0	++	+	++	-	-? 2	0?	-?	0	-	-	0	++
H756	++/-	0	++?	++/		+/	0	++	++	++		-? ?	0? 0?	? -?	0	-	-	0	++
H760	++/-	0	+ ! /	++/		+/	0	++/!	++	++	-	-?	0?	0?	0	-	-	0	++
H761	++	0	++?	+	-	+	0	++	+	++	-	-?	?	?	0	-	-	0	++
H762	++	0	++?	+		0/+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
H763	-	0	++?	+		+	0	++/?	+	++	-	-?	?	0?	0	-	-	0	++
H764	+	0	++?	+	-	+	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H768	++	0	++?	+		+	0	++/?	+	++	-	-?	?	-?	0	-	-	0	++
H776	++	0	++?	++	-	+	0	++	+	++	-	-?	0?	0?	0	-	-	0	++
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H810	H809		0		++/0	-	+/-	0	++/?	+	++	-	-?	0?	-?	0	-	-	0	++
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H1702		++	0	++?	++		+	0	++	+	++	+	+?	0?	0?	0	0	+?	0	++
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EIRBS		+	+	0	0	0	0	0	+	0	+	-	-?	-?	-?	0	-	-	0	+
E1885		+	+	0	0	0	0	0	+	0	+	-	-?	-?	-?	0		-	0	+
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UGS919 0 <td>UGS917</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>+?</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td>	UGS917	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
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	щe	ک	o		>	is a		tion	D	Sustainable Isport	Efficient land	Landscape	i E	Biodiversity diversity	lon	ng	4.		te c
	olo	nor	cati	Ith	enit	/ice	ЭС	rea	sin	sta ort	icie	spu	itor	odiv	Pollution	Flooding	Waste	Efficient erials	maj
Site	Employment	Economy	Education	Health	Amenity	Services	Crime	Recreation	Housing								Š	18: Efficie materials	
option	-:-	2: E	3:	4:	2: /	.9	7: (9:	10: Trar	11:	12:	13:	14: Biodiver geodiversity	15:	16:	17:	18: mat	19:
UGS941	0	0	0	0	0	0	0	+	0	0	+	++	++?	++	0	++	0	0	0
UGS942	0	0	0	0	0	0	0	+	0	0	+	+	++?	+	0	0	0	0	0
UGS943	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS944 UGS946	0	0	0	0	0	0	0	+	0	0	+ 0	+ +	+?	+	0	0	0	0	0
UGS947	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS948	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS949	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS951	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS952	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS953 UGS954	0	0	0	0	0	0	0	+	0	0	0	+ +	+?	+	0	0	0	0	0
UGS954 UGS955	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS956	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS957	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS958	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS959	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS960 UGS961	0	0	0	0	0	0	0	+	0	0	+ 0	++	+?	++	0	+ 0	0	0	0
UGS962	0	0	0	0	0	0	0	+	0	0	0	++	++?	+ +	0	+	0	0	0
UGS963	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS964	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS965	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS966	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS967 UGS968	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS968 UGS969	0	0	0	0	0	0	0	+	0	0	0 +	+ +	0	+	0	0	0	0	0
UGS970	0	0	0	0	0	0	0	+	0	0	+	++	+?	++	0	+	0	0	0
UGS971	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS972	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS973	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS974 UGS975	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0 +	0	0	0
UGS977	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS978	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS979	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS980	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS982	0	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0	0	0	0
UGS983 UGS984	0	0	0	0	0	0	0	+	0	0	0	+ +	+?	+	0	0	0	0	0
UGS985	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS986	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS987	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS988	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS990	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS991 UGS992	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+ 0	0	0	0
UGS992 UGS993	0	0	0	0	0	0	0	+	0	0	0	++	+? +?	+ +	0	+	0	0	0
UGS994	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS995	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS996	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS997	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS998	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS999 UGS1000	0	0	0	0	0	0	0	+	0	0	0	+ +	+? +?	+	0	0	0	0	0
UGS1000	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1001	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0

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	Employment	Economy	Education	Ŧ	Amenity	Services	ne	Recreation	Housing	10: Sustainable Transport	ficie	Landscape	stor	14: Biodiversity geodiversity	Pollution	Flooding	Waste	Efficient erials	ma
Site	Emp	Eco	Edu	Health	Αme	Ser	Crime	Rec	HoU								Š		
option	<u></u>	2:	 	 -	5: ,	.9	7: (-:6	10: Trar	11:	12:	13:	14: geo	15:	16:	17:	18: mat	19:
UGS1003	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1004	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1005 UGS1006	0	0	0	0	0	0	0	+	0	0	0	++	0 +?	++	0	+	0	0	0
UGS1007	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1008	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1009	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1010	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1011 UGS1012	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1012	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1014	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1015	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1016	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1017 UGS1018	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+ 0	0	0	0
UGS1018	0	0	0	0	0	0	0	+	0	0	0	+ +	0	+	0	0	0	0	0
UGS1017	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1021	0	0	0	0	0	0	0	+	0	0	+	++	0	++	0	+	0	0	0
UGS1022	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1023	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1024 UGS1025	0	0	0	0	0	0	0	+	0	0	0	+	0 +?	+	0	+ 0	0	0	0
UGS1023	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1028	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1029	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1030	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1031 UGS1032	0	0	0	0	0	0	0	+	0	0	+ 0	++	+?	++	0	+	0	0	0
UGS1032	0	0	0	0	0	0	0	+	0	0	+	++	+?	++	0	++	0	0	0
UGS1034	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1035	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1036	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1037	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1038 UGS1039	0	0	0	0	0	0	0	+	0	0	0	++	0 +?	+ +	0	0 ++	0	0	0
UGS1040	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+	0	0	0
UGS1041	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1042	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1043 UGS1044	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1044 UGS1045	0	0	0	0	0	0	0	+	0	0	0	+ +	++?	+	0	0	0	0	0
UGS1045	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1047	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1048	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1049	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1050 UGS1051	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1051	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1053	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1054	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1055	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1056 UGS1057	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1057 UGS1058	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1059	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1060	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
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Employment: Economy Economy Health Services and Facilities Crime Crime Housing O: Sustainable ransport T: Efficient land use Tansport T: Efficient land use Tansport T: Efficient use of Services and Facilities The Amenity T										SA c	bjecti	ves								
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Company Comp	Site	Emp	Eco	Edu	Неа	ΑЩ	Ser	Crir	Rec	HoU				菫				Š	Eff teri	
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USS1064																				
USS1065																				
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UGS1086 0 </td <td></td> <td>_</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>													_							
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UGS1093 0 </td <td></td>																				
UGS1094 0 </td <td></td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>+?</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td>		0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
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UGS1097 0 </td <td></td> <td>_</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>													_							
UGS1098 0 </td <td></td> <td>_</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>													_							
UGS1100 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0													_							
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UGS1104 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0 0													_							
UGS1105 0 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + + ++? ++ 0 ++ 0 0 0									+				++		++					
UGS1106 0 0 0 0 0 0 0 0 + 0 0 0 + +++? + 0 0 0 0													_							
UGS1107													_							
UGS1108 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0													_							
UGS1110 0 0 0 0 0 0 0 0 0 + 0 0 0 + +++2 + 0 0 0 0													_							
UGS1111 0 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + + + +		0	0	0		0	0	0	+	0	0		++		++	0	+	0	0	
UGS1112 0 0 0 0 0 0 0 0 + 0 0 0 + +? + 0 0 0 0																				
UGS1113 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0													_							
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UGS1116 0 0 0 0 0 0 0 0 0 + 0 0 0 + + + +? ++ 0 + 0													_							
UGS1117 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + + +++ ++	UGS1117	0	0		0	0	0			0	0		_			0		0	0	0
UGS1118 0 0 0 0 0 0 0 0 0 0 + 0 0 0 + ++? + 0 0 0 0	UGS1118	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0

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	me	کِ	o		>			roi	_	nak	nt I	cap	<u>с</u> Е	ers	o	р			e c
	Employment	Economy	Education	달	Amenity	Services	ЭС	Recreation	Housing	Sustainable Isport	Efficient land	Landscape	tor	Biodiversity diversity	Pollution	Flooding	Waste	Efficient erials	Climate change
Site	du	cor	np	Health	me	Ser.	Crime	Recr	nop				His				Wa	Eff eria	
option	1: E	2: E	3:	4: T	5: 4	6:5	7: 0	 E	9: ٢	10: Susta Transport	11:	12:	13:	14: Biodiver geodiversity	15:	16:	17:	18: Efficie materials	19:
UGS1119	0	0	0	0	0	0	0	+	0	0	Ô	+	+?	+	0	0	0	0	0
UGS1120	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1121	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1122 UGS1123	0	0	0	0	0	0	0	+	0	0	0	+	+? +?	+	0	0	0	0	0
UGS1123	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	0	0	0	0
UGS1125	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1126	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1127	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1128	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1129 UGS1130	0	0	0	0	0	0	0	+	0	0	0	+	+? +?	+	0	0	0	0	0
UGS1130 UGS1131	0	0	0	0	0	0	0	+	0	0	0	+ +	+?	+ +	0	++	0	0	0
UGS1131	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1133	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1134	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1135	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1136 UGS1137	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1137	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1139	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1140	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1141	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1142	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1144 UGS1145	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1145	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1147	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1148	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1149	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1150	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1151 UGS1152	0	0	0	0	0	0	0	+	0	0	0	++	+? +?	++	0	+	0	0	0
UGS1153	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1154	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	++	0	0	0
UGS1155	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1156	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1157 UGS1158	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0 +	0	0	0
UGS1150	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1160	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1161	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1162	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1163	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1164 UGS1165	0	0	0	0	0	0	0	+	0	0	0	+	+? +?	+	0	0	0	0	0
UGS1165 UGS1166	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1167	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1168	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1169	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1170	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1171 UGS1172	0	0	0	0	0	0	0	+	0	0	0	++	+? +?	++	0	0	0	0	0
UGS1172 UGS1173	0	0	0	0	0	0	0	+	0	0	0	++	+?	+ +	0	+	0	0	0
UGS1173	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1175	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1176	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
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	Employment	Economy	Education	Ŧ	Amenity	Services	ne	Recreation	Housing	10: Sustainable Transport	ficie	Landscape	stor	14: Biodiversity geodiversity	Pollution	Flooding	Waste	Efficient erials	ma
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option	<u></u>	2:	 	 -	5: ,	.9	7: (9:	10: Trar	11:	12:	13:	14: geo	15:	16:	17:	18: mat	19:
UGS1177	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1178	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1179 UGS1180	0	0	0	0	0	0	0	+	0	0	0	++	+? +?	++	0	++	0	0	0
UGS1181	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1182	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1183	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1184	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1185 UGS1186	0	0	0	0	0	0	0	+	0	0	0	+	+? +?	+	0	0	0	0	0
UGS1187	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1188	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1189	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1190	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1191 UGS1192	0	0	0	0	0	0	0	+	0	0	0	+ +	+?	+ +	0	0 +	0	0	0
UGS1192	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1194	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1195	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1196	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1197 UGS1198	0	0	0	0	0	0	0	+	0	0	0	+	+? +?	+	0	0	0	0	0
UGS1198	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1200	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1201	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1202	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1203 UGS1204	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1204 UGS1205	0	0	0	0	0	0	0	+	0	0	0	+ +	+? +?	+	0	0	0	0	0
UGS1206	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1207	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1208	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1209 UGS1210	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1210 UGS1211	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1211	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1213	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1214	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1215 UGS1216	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+ 0	0	0	0
UGS1216 UGS1217	0	0	0	0	0	0	0	+	0	0	0	++	++?	+ +	0	+	0	0	0
UGS1217	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1219	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1220	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1221	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1222 UGS1223	0	0	0	0	0	0	0	+	0	0	0	+ +	+? +?	+	0	+ 0	0	0	0
UGS1223	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1225	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1226	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1227	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1228 UGS1229	0	0	0	0	0	0	0	+	0	0	0	++	0 +?	+ +	0	0 +	0	0	0
UGS1229	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	0	0	0	0
UGS1231	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1232	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	+	0	0	0
UGS1233	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0

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	Employment	>	۾			an		e U		Sustainable Isport	Efficient land	Landscape	山山	Biodiversity diversity	Ľ	g			Climate change
	oyr	Economy	Education	ج	Amenity	Services	(1)	Recreation	Housing	tair rt	ien	dsc	oric	dive rsit	Pollution	Flooding	ste	Efficient erials	nate
	ldu	ů.	inc	Health	ner	Ξ	Crime	scre	Snc	ods	Effic	an.	Hist	3ioc ive	olli	00	Waste	irial	ř
Site	늅						Ş			10: Susta Transport		2: L	3: +	14: Biodiver geodiversity	5: F	16: F	17: V	18: Efficie materials	9: 0
option UGS1234		2:	 	 4	5:	9	7:	<u> </u>			11	_	+?						_
UGS1234 UGS1235	0	0	0	0	0	0	0	+	0	0	0	+ +	+?	+ +	0	0 +	0	0	0
UGS1236	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1237	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1238	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1239	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1240	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1242	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1243	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1244 UGS1245	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1245 UGS1246	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1247	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1248	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1249	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1250	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1251	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1252	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1253	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1254 UGS1255	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1255 UGS1256	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1257	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1258	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1259	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1260	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1261	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1262	0	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0	0	0	0
UGS1263 UGS1264	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1264 UGS1265	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++ 0	0	0	0
UGS1266	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1267	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1268	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1269	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1270	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1271	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1272 UGS1273	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1273 UGS1274	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	+ 0	0	0	0
UGS1274	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1276	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1278	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1279	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	++	0	0	0
UGS1280	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS1281	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1282 UGS1283	0	0	0	0	0	0	0	+	0	0	+	+	++?	+	0	+	0	0	0
UGS1283 UGS1284	0	0	0	0	0	0	0	+	0	0	0 +	+	++?	+	0	+ 0	0	0	0
UGS1285	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1286	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS1287	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS1288	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1289	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1290	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1291	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1292	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0

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						S S							nt						
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	ü					and		_		ple	Efficient land	e	invi					nse	har
	Employment	ک	ion		>	ss a		Recreation	D	Sustainable Isport	nt –	Landscape	i i	Biodiversity diversity	ion	ng	4)		te
	olo	non	cat	II H	enit	vice	ne	rea	ısin	ısta oort	ficie	spu	stor	odiv	Pollution	Flooding	Waste	Efficient erials	ma
Site	Emp	Economy	Education	Health	Amenity	Services	Crime	Rec	Housing				±				Š	18: Efficie materials	
option	<u></u>	2:	 	4:	2:	.9	7: (-:6	10: Trar	17	12:	13:	14: geo	15:	16:	17:	18: mat	19:
UGS1293	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1295	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1296 UGS1297	0	0	0	0	0	0	0	+	0	0	0	+ +	0	+	0	+ 0	0	0	0
UGS1298	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1299	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1300	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1301	0	0	0	0	0	0	0	+	0	0	0	++	0	++	0	+	0	0	0
UGS1302 UGS1303	0	0	0	0	0	0	0	+	0	0	0	+ +	0 +?	+	0	+ 0	0	0	0
UGS1304	0	0	0	0	0	0	0	+	0	0	0	++	+?	++	0	+	0	0	0
UGS1306	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1307	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1308	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1310 UGS1311	0	0	0	0	0	0	0	+	0	0	0 +	+ +	+? ++?	+ +	0	0 ++	0	0	0
UGS1312	0	0	0	0	0	0	0	+	0	0	+	+	+?	+	0	0	0	0	0
UGS1315	0	0	0	0	0	0	0	+	0	0	+	+	++?	+	0	+	0	0	0
UGS1316	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1317	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1318 UGS1319	0	0	0	0	0	0	0	+	0	0	0	+ +	+?	+	0	0	0	0	0
UGS1430	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1432	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1433	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1434	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1435 UGS1436	0	0	0	0	0	0	0	+	0	0	0	+ +	+?	+	0	0	0	0	0
UGS1437	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1438	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1440	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1441 UGS1445	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1445 UGS1446	0	0	0	0	0	0	0	+	0	0	0	+	0 +?	+	0	0	0	0	0
UGS1451	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1453	0	0	0	0	0	0	0	+	0	0	0	++	++?	++	0	++	0	0	0
UGS1454	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1457 UGS1459	0	0	0	0	0	0	0	+	0	0	0	+ +	+?	+	0	0	0	0	0
UGS1460	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1462	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1464	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1466	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1468 UGS1471	0	0	0	0	0	0	0	+	0	0	0	+ +	+? +?	+	0	+ 0	0	0	0
UGS1471	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1476	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS1477	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1478	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	+	0	0	0
UGS1479 UGS1485	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1483	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1493	0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	0	0	0	0
UGS1494	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1495	0	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	0	0	0
UGS1497 UGS1503	0	0	0	0	0	0	0	+	0	0	0	+ +	++?	+	0	0	0	0	0
0031303	U	U	U	U	U	U	U		U	U	U		177		U	U	U	U	U

Sile										SA c	bjecti	ves								
US\$1513 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0							Services and			Housing	Sustainable nsport	Efficient land use		13: Historic Environment	Biodiversity diversity	5.			ent use	
USS115616 O O O O O O O O O			_			_						_	+	++?			0			
UGS15224 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		0	0	0	0	0	0			0	0					0	0		0	0
USS1197 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		0	0	0	0	0	0	0		0	0					0	0	0	0	0
UGS1533 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	UGS1524	0	0	0	0	0	0	0	+	0	0	0	+		+	0	0	0	0	0
UGS1533 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	UGS1529	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1936 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	UGS1530	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1976 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	UGS1531	0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS1976 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		0	0	0	0	0	0	0	+	0	0	0	+	++?	+	0	+	0	0	0
UGS2118		0	0	0	0	0	0	0	+	0	0	0	+	+?	+	0	0	0	0	0
UGS2118		0	0	0		0	0		+	0	0		+		+	0				
USS2150						_			+						+		_			
USS2156						_														
USS2186						_							_				_			
UGS2486 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0						_							_							
UGS2486 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0													+							
UGS2124						-							+					_		
LOCGS2124						-											0			
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Traveller Sites GTTS1957						_														
GTTS1957 H O H O H O H O H H H O H O H H H H H	200002.20	J		J			J													ū
Minerals Sites Minerals Min	GTTS1957	++	0	+/0?	++		+	0	++	++	++	-	-?	0?	-?	0	-	-	0	++
ME1965	07700407																			
ME1966	G11S2487	++		+?	0		+	0	+	++	++	-	-?	?		0	-	-	0	++
ME1970 ME1971 ME1971 ME1972 ME1973 ME1973 ME1975 ME2240 ME2240 ME2241 ME2241 ME2242 ME2243 ME2244 ME2244 ME2244 ME2244 ME2245 ME2245 ME2245 ME2246 ME2246 ME2246 ME2246 ME2246 ME2246 ME2247 ME2247 ME2248 ME2248 ME2248 ME2248 ME2248 ME2248 ME2248 ME2249 ME2249 ME2249 ME2240 ME2241 ME2241 ME2241 ME2243 ME2243 ME2244 ME2245 ME2245 ME2246 ME2246 ME2246 ME2246 ME2247 ME2247 ME2248 ME2248 ME2248 ME2248 ME2248 ME2248 ME2248 ME2248 ME2248 ME2249 ME2249 ME2247 ME2248 ME2248 ME2248 ME2248 ME2249 ME2247 ME2248 ME2248 ME2248 ME2248 ME2249 ME2247 ME2247 ME2248 ME2248 ME2248 ME2248 ME2249 ME2247 ME2248 ME2248 ME2247 ME2248 ME2248 ME2248 ME2248 ME2249 ME2247 ME2248 ME2248 ME2249 ME2249 ME2249 ME2247 ME2248 ME2249 ME2249 ME2249 ME2249 ME2250 ME2260		++		+?			+					-			0?		-		0	++
ME1970 ## + 0	ME1965		0	0	-?	-?	0	0	Mine	als S	O 0		-?	0?	0? -?/+?	-?/0	0	0	0	0
ME1971	ME1965 ME1966	+	0 +	0	-? -?	-? -?	0	0	Mine: -/+? /+?	0 0	O O	-	-? -?	0? 0?	0? -?/+? -?/+?	-?/0 0	0	0	0	0
ME1972 + + 0 -? -? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /+? 0 0 /-? 0? /+? 0 0 /-? 0? /+? 0 0 /-? 0? /-? 0	ME1965 ME1966 ME1968	+ + + +	+ + +	0 0 0	-? -? -?	-? -? -?	0 0 0	0 0	Mine: -/+? /+? /+?	0 0 0	0 0 0	- - -	-? -? -?	0? 0? 0?	0? -?/+? -?/+?	-?/0 0	0 0	0 0	0 0	0 0 0
ME1973	ME1965 ME1966 ME1968 ME1970	+ + + + +	+ + +	0 0 0	-? -? -?	-? -? -?	0 0 0	0 0 0	Miner -/+? /+? /+?	0 0 0 0	0 0 0 0	- - -	-? -? -?	0? 0? 0? 0?	0? -?/+? -?/+? ?/+?	-?/0 0 0	0 0 0	0 0 0	0 0 0	0 0 0
ME1975 + + 0 -? -? 0 0 -/+? 0 0 -/+? 0 0 -/-? 0? -?/+? 0 0 -/-? 0? -?/+? 0 0 -/-? 0? -/-/*? 0 0 -/-? 0? -/-/*? 0 0 -/-? 0? -/-/*? 0 0 -/-? 0? -/-/*? 0 0 -/-? 0? -/-? 0? -/-? 0? -/-? 0? -/-? 0? -/-? 0 <	ME1965 ME1966 ME1968 ME1970 ME1971	+ + + +	+ + + +	0 0 0 0	-? -? -? -?	-? -? -? -?	0 0 0 0	0 0 0 0	Miner -/+?/+?/+?/+?	0 0 0 0 0	0 0 0 0 0	- - - - -	-? -? -? -?	0? 0? 0? 0? 0?	0? -?/+? -?/+? ?/+? -?/+?	-?/0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0
ME2240	ME1965 ME1966 ME1968 ME1970 ME1971 ME1972	+ + + + +	+ + + + +	0 0 0 0 0	-? -? -? -?	-? -? -? -? -?	0 0 0 0 0	0 0 0 0 0	Miner -/+?/+?/+?/+?/+?	0 0 0 0 0 0	0 0 0 0 0 0		-? -? -? -?	0? 0? 0? 0? 0?	0? -?/+? -?/+? -?/+? -?/+?	-?/0 0 0 0 0	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0
ME2241	ME1965 ME1966 ME1968 ME1970 ME1971 ME1972 ME1973	+ + + + + + + +	+ + + + + +	0 0 0 0 0	-? -? -? -? -? -?	-? -? -? -? -?	0 0 0 0 0	0 0 0 0 0	Miner -/+?/+?/+?/+?/+?/+?	0 0 0 0 0 0	0 0 0 0 0 0		-? -? -? -? -?	0? 0? 0? 0? 0? 0?	0? -?/+? -?/+??/+? -?/+? -?/+?	-?/0 0 0 0 0	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0
ME2242	ME1965 ME1966 ME1968 ME1970 ME1971 ME1972 ME1973 ME1975	+ + + + + + + +	+ + + + + + +	0 0 0 0 0 0	-? -? -? -? -? 0	-? -? -? -? -? -?	0 0 0 0 0 0	0 0 0 0 0 0	Miner -/+?/+?/+?/+?/+?/+?/+?	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0		-? -? -? -? -? -?	0? 0? 0? 0? 0? 0? 0?	0? -?/+? -?/+??/+? -?/+? -?/+? -?/+?	-?/0 0 0 0 0 0	0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0 0
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ME2245	ME1965 ME1966 ME1968 ME1970 ME1971 ME1972 ME1973 ME1975 ME2240 ME2241	+ + + + + + + +	+ + + + + + + +	0 0 0 0 0 0 0	-? -? -? -? -? 0 -? -?	-? -? -? -? -? -? -?	0 0 0 0 0 0 0	0 0 0 0 0 0 0	Miner -/+?/+?/+?/+?/+?/+?/+?/+?	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		-? -? -? -? -? -? -? -?	0? 0? 0? 0? 0? 0? 0? 0? 0?	0? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+?	-?/0 0 0 0 0 0 0 0 -?/0	0 0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0 0
ME2246	ME1965 ME1966 ME1968 ME1970 ME1971 ME1972 ME1973 ME1975 ME2240 ME2241 ME2242	+ + + + + + + + +	O + + + + + + + + + + + + + + + + + + +	0 0 0 0 0 0 0 0	-? -? -? -? -? -? 0 -? -?	-? -? -? -? -? -? -? -?	0 0 0 0 0 0 0 0	0 0 0 0 0 0 0	Miner -/+?/+?/+?/+?/+?/+?/+?/+?/+?/+?	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0		-? -? -? -? -? -? -? -?	0? 0? 0? 0? 0? 0? 0? 0? 0? 0?	0? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+?	-?/0 0 0 0 0 0 0 0 -?/0 -?/0	0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0
ME2247	ME1965 ME1966 ME1968 ME1970 ME1971 ME1972 ME1973 ME1975 ME2240 ME2241 ME2242 ME2243	+ + + + + + + + + +	0 + + + + + + + + + + + +	0 0 0 0 0 0 0 0 0	-? -? -? -? -? 0 -? -? 0	-? -? -? -? -? -? -? -?	0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0	Miner -/+?/+?/+?/+?/+?/+?/+?/+?/+?/+? -/+?	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0 0		-? -? -? -? -? -? -? -? -?	0? 0? 0? 0? 0? 0? 0? 0? 0? 0?	0? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+? -?/+?	-?/0 0 0 0 0 0 0 0 -?/0 -?/0 0	0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0 0
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									SA d	bjecti	ves								
Site option	1: Employment	2: Economy	3: Education	4: Health	5: Amenity	6: Services and Facilities	7: Crime	8: Recreation	9: Housing	10: Sustainable Transport	11: Efficient land use	12: Landscape	13: Historic Environment	14: Biodiversity and geodiversity	15: Pollution	16: Flooding	17: Waste	18: Efficient use of materials	19: Climate change
ME2267	+	+	0	0	-?	0	0	/+?	0	0	-	-?	?	?/+?	-?/0	0	0	0	0
ME2312	+	+	0	-?	-?	0	0	-/+?	0	+?	-	-?	?	?/+?	-?/0	0	0	0	0
ME2313	+	+	0	-?	-?	0	0	-/+?	0	0		-?	?	?/+?	0	0	0	0	0
ME2314	+	+	0	-?	-?	0	0	/+?	0	+?	-	-?	?	-?/+?	-?/0	0	0	0	0
ME2315	+	+	0	-?	-?	0	0	/+?	0	0	-	-?	?	-?/+?	-?/0	0	0	0	0
	Waste Sites																		
W1	+	+	0	-?	-	0	0	-	0	+?	-	-	0?	?	-	0	0	0	+

Recommendations

- 12.79 As described in **Chapter 2**, the SA findings for the site options were originally sent to Kirklees Council in the form of summary SA notes prior to preparation of the full SA Report, so that the findings could be taken into account as decisions were made about which sites to allocate. In those summary SA notes, the following recommendations were made:
 - **Mixed use sites** it was recommended that the four sites in flood zone 2 and 3 (MX1912, MX1913, MX1915 and MX1918) are not allocated as Mixed Use sites in the Local Plan, unless the sequential test can be met.
 - Traveller sites it was recommended that the four sites in flood zone 2 and 3 (GTTS1954, GTTS1955, GTTS1956 and GTTS2039) are not allocated as Traveller sites in the Local Plan, unless the exception test can be met.
- 12.80 None of these sites have been included as allocations in the Draft Local Plan and the recommendation remains that they should not be included as allocations in future iterations of the Local Plan unless the exception test can be met.
- 12.81 A small number of additional recommendations are now made in relation to the Draft Local Plan policies:
 - Policy DLP11: Housing Mix and Affordable Housing seeks to provide a mix of types, sizes and tenures of housing, including housing for older people; however there is no specific reference to adaptable/lifetime homes.
 - DLP17: Huddersfield Town Centre and DLP18: Dewsbury Town Centre both make reference to protecting the historic environment but could also make reference to local character in general.
 - **DLP25: Renewable and Low Carbon Energy** could make specific reference to the need to protect cultural heritage and biodiversity while it refers to not compromising 'the statutory protection of any area', protection of non-designated assets should also be included.
 - **DLP37: Mineral Extraction** could also refer to the impacts of minerals transportation in relation to air quality and the need to avoid adverse effects.

13 Monitoring

- 13.1 The SEA Regulations require that "the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action" and that the environmental report should provide information on "a description of the measures envisaged concerning monitoring". Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 13.2 The Planning Advisory Service guidance on SA states that it is not necessary to monitor everything. Instead, monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Because of the early stage of the Kirklees Local Plan and the uncertainty attached to many of the potential effects identified, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA framework. As the Local Plan is progressed and the likely significant effects are identified with more certainty, it may be appropriate to narrow down the monitoring framework to focus on a smaller number of the SA objectives.
- 13.3 **Table 13.1** sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Local Plan. Note that the indicators proposed are included as suggestions and some have been drawn from the indicators proposed in the Draft Local Plan. Therefore, the indicators included in **Table 13.1** may change as Kirklees Council finalises its monitoring framework.
- 13.4 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the Council continues the dialogue with statutory environmental consultees and other stakeholders that has already been commenced, and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 13.1 Proposed Monitoring Framework for the Kirklees Local Plan

SA objectives	Proposed monitoring indicators
1: Increase the number and range of employment	Total amount of additional employment floor space – by type (B1, B2, B8).
opportunities available for local people, and ensure that	Amount of employment land lost to residential development.
they are accessible.	
2. Achieve an economy better capable of growth	Total amount of additional employment floor space – by type (B1, B2, B8).
through increasing investment, innovation and	Amount of employment land lost to residential development.
Entrepreneurship.	
3. Ensure education facilities are available to all.	New education and/or training facilities permitted (sqm).
	Educational attainment.
4. Improve the health of local people and ensure that	New health care facilities permitted (sqm).
they can access the health and social care they need.	Average life expectancy.
5. Protect local amenity including avoiding noise and	Number of planning applications refused for noise reasons.
light pollution.	Number of noise pollution incidents reports annually.
6. Retain and enhance access to local services and	Amount of new and loss of community facilities (sqm).
facilities.	Number of retail proposals permitted outside of the defined primary shopping areas in hierarchy
	of centres.
7. Make our communities safer by reducing crime, anti-	Number of crimes reported annually in the District.
social behaviour and the fear of crime.	Citas with Casas Flag status
8. Protect and enhance existing and support the	Sites with Green Flag status. Not increase in least green green.
provision of new recreation facilities and areas of open	Net increase in local green space.
space and encourage their usage.	Area of new open space delivered through development.
9. Ensure all people are able to live in a decent home	Number of net additional residential units.
which meets their needs.	Gross affordable housing completions split by affordable rent, social rented and intermediate.
	Number of permitted Traveller pitches/schemes.
	New and converted dwellings on previously developed land.
10. Secure an effective and safe transport network	Number of road casualties.
which encourages people to make use of sustainable	Number of planning permissions where travel plans secured.
and active modes of transport.	Frequency of bus services in the District's villages.
11. Secure the efficient and prudent use of land.	Number of potentially contaminated land sites remediated through the planning process.
·	Percentage of new development taking place on brownfield land.
12. Protect and enhance the character of Kirklees and	Percentage of new development taking place on brownfield land.
the quality of the landscape and townscape.	
13. Conserve and enhance the historic environment,	Number of heritage assets within the District on the 'Heritage at Risk Register'.
heritage assets and their settings.	No of applications approved contrary to advice from relevant statutory bodies.

SA objectives	Proposed monitoring indicators
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	• Change in areas and populations of biodiversity importance, including (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional significance (changes arising from development, management and planning agreements, in hectares and numbers of priority species type).
15. Reduce air, water and soil pollution.	 Number of planning applications refused for air quality reasons. Number of planning permissions granted contrary to sustained objection of the Environment Agency on water quality grounds. Number of declared Air Quality Management Areas (AQMAs) in the District.
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	Number of planning permissions granted contrary to sustained objection of the Environment Agency on flood risk grounds.
17. Increase prevention, re-use, recovery and recycling of waste close to source.	 Percentage of municipal waste landfilled. Percentage of household waste sent for reuse, recycling and composting. Number of planning permissions granted for new waste management facilities.
18. Increase efficiency in water, energy and raw material use.	 Permissions granted for non-mineral uses on a safeguarded minerals infrastructure site. Number of planning permissions where the mineral has been successfully extracted prior to development. The amount of renewable energy generation by installed capacity and type.
19. Reduce the contribution that the District makes to climate change.	The amount of renewable energy generation by installed capacity and type.

14 Conclusions and Next Steps

- 14.1 The reasonable alternative site and policy options, as well as the draft policies and site allocations for the Kirklees Local Plan have been subject to a detailed appraisal against the SA objectives which were developed at the Scoping stage of the SA process. The emerging Draft Local Plan proposes a large amount of housing, employment and other development across Kirklees to meet future needs of the District; therefore the SA has identified the potential for negative effects on many of the environmental objectives including biodiversity, cultural heritage and the landscape. However, a large number of reasonable alternative site options have been considered and the Council had a wide choice of relatively unconstrained sites to select for Local Plan allocations. Where the early SA work specifically recommended that particular sites not be allocated due to flood risk issues, those sites have not been taken forward as allocations in the Draft Local Plan.
- 14.2 In addition, the Local Plan also includes a wide range of draft development management style policies, aiming to protect and enhance the economic, social and environmental conditions of the District. These should go a long way towards mitigating the potential negative effects of the overall scale of development proposed.

Next Steps

- 14.3 This SA Report will be available for consultation alongside the Draft Local Plan between November and December 2015
- 14.4 Following this consultation the responses will be reviewed and addressed as appropriate. The findings of the SA and the outcomes of the consultation will be taken into account by the Council as it prepares the next iteration of the Local Plan. The SA will then be updated to reflect any changes made to the policies and site allocations in that version of the Local Plan and further consideration will be given to potential mitigation measures as well as the approach to monitoring the likely significant effects of the plan.

LUC September 2015

Appendix 1

Scoping Consultation Responses

Table A1.1: Draft SA Scoping Report Consultation Responses and Comments (consultation occurred between March and April 2015)

Note that the comments in the final column refer to actions that were taken to address consultation comments in the final version of the SA Scoping Report (published May 2015) and references to chapters and appendices refer to that document. The updated baseline information and review of plans, policies and programmes can be found in **Appendices 2 and 3** respectively of this full SA Report.

Consultee Comment	Response/comment and how it was addressed in the final SA Scoping Report (May 2015)
Environment Agency	
Plans, Policies or Programmes Water Quality The Water Framework Directive (WFD) is mentioned in this section, however the Humber River Basin Management Plan (RBMP) should also be referenced as it provides a delivery mechanism to achieve the aims of the WFD and identifies specific areas where action is required to improve the status of waterbodies.	Noted. The Humber River Basin Management Plan, the Aire and Calder Catchment Abstraction Management Strategy, the Preliminary Flood Risk Assessment and Local Flood Risk Management Strategy have been added to the updated review of plans, policies and programmes which can be found in Appendix 2 of this SA report. The updated Calder Strategic Flood Risk Assessment (SFRA) will be
Reference should be made to the relevant local Catchment Abstraction Management Strategy (CAMS) for the Aire and Calder (2013), which is available by following the link: https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process#yorkshire-map-area-3.	added to the policy review once it has been updated.
Flood Risk The Calder Strategic Flood Risk Assessment (SFRA) is in the process of being updated and will need to be reflected in this section. The Preliminary Flood Risk Assessment and the local Flood Risk Management Strategy is relevant to flood risk in Kirklees, and is a key consideration for the SA and the Kirklees Local Plan.	
Baseline for the SA Water Quality We welcome the reference to WFD and to the status of the District's watercourses in paragraph 3.47. The Humber RBMP will have been referenced in order to understand	Noted. As described above, the Humber RBMP has been added to the updated review of plans, policies and programmes in Appendix 2 of this SA report. SA objective 15 seeks to reduce levels of water pollution in and around Kirklees. As also noted above, the updated Calder SFRA will be taken into account in the SA when it becomes

the baseline position for the District, this being the document that that sets out

available. Baseline information about levels of flood risk in Kirklees

Consultee Comment	Response/comment and how it was addressed in the final SA Scoping Report (May 2015)
waterbody status.	was expanded in Chapter 3 of the updated Scoping Report.
The WFD is now the key piece of EU legislation governing protection of the water environment, with key requirements of bringing surface water bodies and groundwater bodies to "Good" status, and ensuring no deterioration of current quality and ecological status. Kirklees as a Local Authority has an important role to play in ensuring that development does not compromise the aims and objectives of the WFD.	
The Humber RBMP requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. Enhancements measures should be encouraged in the Local Plan and the Humber RBMP should be used to inform the SA objectives.	
Flood Risk	
With regard to paragraph 3.48, we are aware that the Calder SFRA is currently under review. Until the updated SFRA is finalised it will be important to ensure that your assessment of flood risk within the District is informed by the most up to date available information.	
The SFRA will need to be read in conjunction with our flood maps. We update our flood maps on a quarterly basis.	
Key Sustainability Issues	Noted. The relevant part of Table 4.1 in the updated Scoping
Biodiversity	Report was amended to refer to Environment Agency flood maps and not 'research'.
We welcome the recognition, under the issue of Biodiversity, that an up-to-date local policy to reflect the NPPF statement that the planning system has a key environmental role including 'contributing to protecting and protecting and enhancing our natural, built and historic environment; and as part of this helping to improve biodiversity' would be beneficial. Our expectation is that a local policy of this nature will be drawn up in due course.	Tiot research.
Climate Change Adaptation and Mitigation	
We also welcome the recognition, under Climate Change Adaptation and Mitigation, of paragraph 94 of the NPPF that local authorities should adopt proactive strategies to mitigate and adapt to climate change.	
We note under this issue also that reference is made to the need for revised policies	

Consultee Comment Response/comment and how it was addressed in the final SA Scoping Report (May 2015) relating to flooding to reflect the findings of the SFRA (Nov 2008). We welcome that a review of flooding policies will be undertaken but this review will need to consider the SFRA update which is currently being progressed. This should be read along with the latest Environment Agency flood maps and not 'research'. Water Quality We welcome the recognition that new local policy guidance is required to ensure that water quality across the District is improved, as set out in table 4.1. **SA Framework** Noted. SA objective 16 was amended to remove the word 'high' in reference to flood risk. **Objectives** With regards to SA objective 19, climate change mitigation and We welcome that objective 14 uses the terms both 'protect' and 'enhance'. adaptation is a cross cutting theme throughout the SA framework In respect of objective 16, our expectation is that an objective that refers to flood risk and is already addressed within other objectives in the SA framework would include reduction of flood risk. The objective should seek to prevent including SA objectives 10: sustainable transport and 16: flood risk inappropriate development in areas at flood risk not just 'high flood risk area' although management. Therefore, no changes have been made to SA objective 19. it is not clear what is meant by 'high flood risk areas' as this is not a term defined in the SA or within the NPPF/NPPG. Our concern is that a reference to a 'high flood risk The reference to PPS25 has been removed from Table A2.1 (in the area' might be taken to mean Flood Zone 3b or 3 only, when there is clearly a need to final version of the Scoping Report the table is renumbered as Table avoid areas at risk of flooding generally. A3.1). We note that objective 19 relates to climate change, addressing the need to reduce the With regards to the SA of the spatial framework, careful contribution that the District makes to climate change. As the need to mitigate and consideration of land use constraints will be a feature of the plan adapt to climate change is recognised as a sustainability issue, we consider that this preparation process whichever option is chosen. The appraisal of should be reflected in the SA objectives. An additional objective such as 'Avoid option 2 was amended slightly to reflect the fact that more weight increased vulnerability to the range of impacts arising from climate change' should be could be given to such constraints under that approach. considered. Alternatively this could be incorporated into an existing objective. Health Impact Assessment Framework Noted, reference to the quality of the natural environment and a new Please note that there is an erroneous reference to PPS25 in table A2.1 (Health Impact decision-making criterion has been added to the fourth 'influence' of Assessment Framework). We would like to highlight the benefits that a quality natural the HIA (4. Air quality, Noise, Neighbourhood Amenity and Natural environment can contribute to 'well being' in the same way as green spaces and Environment) in **Appendix 3** of the final Scoping Report. amenity spaces can have.

SA Framework for Spatial Framework Options

We have the following observation in relation to the text under the justification column

Consultee Comment	Response/comment and how it was addressed in the final SA Scoping Report (May 2015)
for SA objective 16. The text states that 'Under approach 2, there would be careful consideration of land use constraints when allocating development, which is assumed to include areas of high flood risk'. Our assumption is that there will be careful consideration of land use constraints when allocating development under all approaches.	
Historic England	
Page 22, Table 4.1: Heritage The need to meet the assessed housing and employment needs of the plan area is likely to put pressure upon the heritage assets of Kirklees. Therefore not only is there a need for the Plan to include specific Policies for the protection of these assets but there is also a need for the Plan to set out a framework for accommodating the assessed development needs of the plan area without harming its considerable number of heritage assets. This Table should be amended to reflect this issue.	Noted. Reasonable options for site allocations for residential, employment and other types of development are being subject to SA during the plan preparation process. This includes an assessment of the likely effects of each site option on cultural heritage.
Page 32, Table 6.1, SA Objective 12 (Local Character) It is not clear how some of the evaluations of the Plan's Objectives against SA Objective 12 have been reached.	Noted. These points were addressed in an updated version of the appraisal in Chapter 6 of the final Scoping Report.
For those Local Plan Objectives which are likely to involve significant new development (such as Objective 1 (Economic growth) and 4 (Housing)) these could have a significant effect upon local character. However, the effects will depend upon how that Objective is implemented. Therefore, it would be more accurate to record the relationship of these two Local Plan Objectives against SA Objective 12 as "uncertain".	
Similarly, the Transport Objective (Objective 3) could impact upon the local character, particularly if it would entail significant new infrastructure. Again, the effects will depend upon how that Objective is implemented. Therefore, it would be more accurate to record the relationship against SA Objective 12 as "uncertain".	
Conversely, improving the vitality and viability of town centres (Objective 2) could have a positive impact upon the historic environment (given that most are Conservation Areas and contain many Listed Buildings) as could the objective for Green Infrastructure (which contributes the significance of many heritage assets).	

Consultee Comment	Response/comment and how it was addressed in the final SA Scoping Report (May 2015)
It is suggested that the assessment of the Local Plan's Objective's against this SA Objective is reviewed.	
Page 32: Table 6.1, SA Objective 13 (historic environment)	Noted. These points were addressed in an updated version of the
It is not clear how some of the evaluations of the Plan's Objectives against SA Objective 13 have been reached. This Table considers that there is unlikely to be any incompatibility between the Local Plan Objectives and the SA Objective for the historic environment. However, most of the Plan's Objectives look likely to have some impact upon SA Objective 13.	appraisal in Chapter 6 of the final Scoping Report.
For those Local Plan Objectives which are likely to involve significant new development (such as Objective 1 (Economic growth) and 4 (Housing)) these could have a significant effect upon the historic assets of Kirklees (particularly given the number of assets in the District). However, the effects will depend upon how that Objective is implemented. Therefore, it would be more accurate to record the relationship against SA Objective 13 as "uncertain".	
Similarly, the Transport Objective (Objective 3) could impact upon the historic environment, particularly if it would entail significant new infrastructure. Again, the effects will depend upon how that Objective is implemented. Therefore, it would be more accurate to record the relationship against SA Objective 13 as "uncertain".	
Conversely, improving the vitality and viability of town centres (Objective 2) could have a positive impact upon the historic environment (given that most are Conservation Areas and contain many Listed Buildings) as could the Objective for Green Infrastructure (which contributes the significance of many heritage assets).	
It is suggested that the assessment of the Local Plan's Objective's against this SA Objective is reviewed.	
English Heritage strongly advises that the Council's Conservation Section and the West Yorkshire Archaeology Service are closely involved throughout the preparation of the SA of the plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management	Noted. The Council's own assessment of site options for the Local Plan has drawn on information provided by West Yorkshire Archaeology Service. The sustainability appraisal of the site options in relation to the historic environment has been based on information provided by Historic England to Kirklees Council about the potential for significant effects to arise from each site. The SA team will continue to draw on information from these sources as appropriate

	Response/comment and how it was addressed in the final SA Scoping Report (May 2015)
of historic assets.	throughout the plan preparation process.

Natural England

Relevant Plans and Programmes

Biodiversity 2020

In addition to the Environment White Paper The Natural Choice (included in Annex 1), the SA should ensure that the Biodiversity 2020 targets are delivered within the plan. These targets include no further declines in protected species, no net loss of priority habitats and 90% of these habitats in favourable condition. The achievement of these targets should be incorporated into the SA.

National Character Area Profiles

The SA should utilise the relevant National Character Area Profiles for Kirklees as they contain useful baseline data and environmental objectives. If amalgamated into the assessment of the plan's likely environmental effects they would provide detailed criteria that is more appropriate to Kirklees.

For example the second Strategic Environmental Objective for NCA 36 (Southern Pennines) seeks to "manage and enhance the pastoral character of the moorland fringes, lower hills and valleys, with their mosaics of pastures and meadows and their strong field patterns defined by drystone walls, to improve ecological networks and strengthen landscape character." This will be achieved in part through the restoration of moorland fringe habitats and retaining and restoring the field patterns and drystone walls. These issues should be considered when determining the compliance of policies and allocations against the SA's biodiversity and landscape objectives.

The following NCAs pertinent to Kirklees are:

NCA 36 - South Pennines

NCA 37 - Yorkshire Southern Pennine Fringe

NCA 38 – Nottinghamshire, Derbyshire and Yorkshire Coalfield

NCA 51 – Dark Peak

The NCA profiles can be found at:

Noted. The Biodiversity 2020 targets have been referenced in the updated policy review in **Appendix 2** of this SA report. The SA includes an assessment of policy and site options on biodiversity (SA objective 14) which includes the potential for effects relating to declines in protected species, loss of habitat and declines in habitat condition.

Information about the NCAs in Kirklees was added to the updated baseline information in **Chapter 3** of the updated Scoping report. The SA will also be drawing from information about landscape character that will be provided in the Kirklees Landscape Character Assessment that is currently being produced. This report was published during the SA of options stage and has been referenced in this SA report.

The Kirklees Biodiversity Strategy, Biodiversity Action Plan, Leeds City Region Green Infrastructure Strategy and Health and Wellbeing Strategy have been added to the updated policy review in **Appendix 2** of this SA report.

Consultee Comment	Response/comment and how it was addressed in the final SA Scoping Report (May 2015)
https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-yorkshire-and-the-humber	
Kirklees Biodiversity Strategy and Biodiversity Action Plan	
The SA should ensure the objectives of the biodiversity strategy and action plan are considered when assessing the plan's performance against SA objective 14 (Biodiversity).	
Green Infrastructure Strategies	
The SA should ensure the objectives of relevant GI strategies (including the Leeds City Region Strategy) are considered when assessing the plan's performance against SA health, access, climate change and biodiversity objectives.	
Health and Wellbeing Strategy	
The Health and Wellbeing Strategy is identified as a critical document that underpins both the plan and SA objectives. In addition to the benefits of formal recreational space, such as playing fields, both the plan and SA should also recognise the benefits of access to nature for both mental and physical health.	
Green Infrastructure (GI) provides a variety of benefits in addition to recreational enjoyment and health, for example; improved health; non-car based transport routes; air quality improvements; landscape; climate change mitigation and adaptation; and improved ecological networks and net-gains in biodiversity. This is recognised in the NPPF where LPAs should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. A strategic approach within the local plan would be achieved if it were underpinned by up-to-date GI and Ecological strategies.	
Baseline Information Paragraph 3.32 identifies key ecological baseline information including the number of Sites of Special Scientific Interests (SSSI) and BAP sites (these should be renamed priority habitats in line with the Natural Environment and Rural Communities Act 2006). The baseline data should include the condition of the SSSI to ensure Biodiversity 2020 targets are met.	Noted. Text relating to the condition of the five SSSIs in Kirklees was added to paragraph 3.32 of the updated Scoping Report.

Consultee Comment	Response/comment and how it was addressed in the final SA Scoping Report (May 2015)	
Sport and Recreation, and Health are both identified as key sustainability issues. As stated above the importance of GI should be recognised. The absence of this recognition within the SA and Plan may jeopardise opportunities to deliver improvements to health alongside other GI benefits. Natural England welcome the suggested policy on health as this should provide an additional policy hook for the enhancement and creation of GI and improved access to nature. Natural England also welcome the SA scoping report's support for an up-to-date biodiversity policy which reflects the NPPF, international and national legislation and local ecological issues (see NE advice on the NCA profiles above). The SA should assess whether the plan will deliver net-gains in biodiversity and enhancements to the wider ecological network, not just the protection of sites in isolation. The SA should consider the benefits of GI when assessing the local plans ability to deliver adaptation to climate change. GI provides cooling environments during extreme	The updated baseline information in Chapter 3 of the updated Scoping report makes reference to the health-related benefits of green infrastructure. The wide ranging benefits of green infrastructure in relation to health, climate change etc. are recognised and will be taken into account in the appraisal of site and policy options. The cumulative effects of the Local Plan on biodiversity has been considered in the SA, as well as the effects of individual development site options and impacts on particular designated sites.	
temperatures and flood attenuation areas at times of high rainfall, they also provide wildlife corridors that enable species to move when faced with deteriorating environmental conditions.		
SA of Vision and Objectives and Options Table 6.1 should score local plan objective 6 (Green Infrastructure) positive against SA objectives 2 (Economic Growth), 4 (Health), 5 (Amenity) and 6 (Access to Services). See advice above regarding the wide benefits of multi-functional GI.	Noted. This point has been addressed in an updated version of the appraisal in Chapter 6 of the final Scoping Report.	

Appendix 2

Review of Plans, Policies and Programmes

Table A2.1: Review of plans, policies and programmes relevant to the preparation of the Kirklees Local Plan and the SA

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA	
INTERNATIONAL					
EU Directives					
SEA Directive 2001 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment	Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.	The Directive must be applied to plans or programmes whose formal preparation begins after 21 July 2004 and to those already in preparation by that date.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive at the national level.	Requirements of the Directive must be met in Sustainability Appraisals.	
The Industrial Emissions Directive 2010 Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control)	This Directive lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.	The Directive sets emission limit values for substances that are harmful to air or water.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objective for reducing pollution.	
Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU	The Directive aims to promote the energy performance of buildings and building units. It requests that member states adopt either national or regional methodology for calculating energy performance and minimum requirements for energy performance.	No targets or indicators.	Policies and site allocations should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include SA objective relating to the energy performance/efficiency of existing and proposed buildings.	
The Birds Directive 2009 Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended	The preservation, maintenance, and reestablishment of biotopes and habitats shall include the following measures: Creation of protected areas. Upkeep and management in accordance with the ecological needs of habitats inside and	No targets or indicators.	Allocated sites and develop policies should make sure that the upkeep of recognised habitats is maintained and not damaged from	Include sustainability objectives for the protection of birds.	

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
	outside the protected zones. Re-establishment of destroyed biotopes. Creation of biotopes.		development. Avoid pollution or deterioration of habitats or any other disturbances effecting birds.	
The Waste Framework Directive 2008 Directive 2008/98/EC on waste	Prevention or reduction of waste production and its harmfulness. The recovery of waste by means of recycling, re-use or reclamation. Recovery or disposal of waste without endangering human health and without using processes that could harm the environment.	Development of clean technology to process waste and promote recycling.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives that minimise waste production as well as promote recycling.
The Air Quality Directive 2008 Directive 2008/50/EC on ambient air quality and cleaner air for Europe	Avoid, prevent and reduce harmful effects of ambient noise pollution on human health and the environment.	No targets or indicators.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to maintain and enhance air quality.
The Floods Directive 2007 Directive 2007/60/EC on the assessment and management of flood risks	Establish a framework for the assessment and management of flood risks, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods.	Preliminary Flood Risk Assessments to be completed by December 2011. Flood Hazard Maps and Flood Risk Maps to be completed by December 2013. Flood Risk Management Plans to be completed by December 2015.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives that relate to flood management and reduction of risk.
The Water Framework Directive 2000 Directive 2000/60/EC	Protection of inland surface waters, transitional waters, coastal waters and groundwaters.	No targets or indicators.	Allocate sites and develop policies that take account of the	Include sustainability objectives to protect and minimise the impact on

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
establishing a framework for community action in the field of water policy			Directive as well as more detailed policies derived from the Directive contained in the NPPF.	water quality.
The Landfill Directive 1999 Directive 99/31/EC on the landfill of waste	Prevent or reduce negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.	Reduce the amount of biodegradable waste sent to landfill to 75% of the 1995 level by 2010. Reduce this to 50% in 2013 and 35% by 2020.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to increase recycling and reduce the amount of waste.
The Drinking Water Directive 1998 Directive 98/83/EC on the quality of water intended for human consumption	Protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.	Member States must set values for water intended for human consumption.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to protect and enhance water quality.
The Packaging and Packaging Waste Directive 1994 Directive 94/62/EC on packaging and packaging waste	Harmonise the packaging waste system of Member States. Reduce the environmental impact of packaging waste.	By June 2001 at least 50% by weight of packaging waste should have been recovered, at least 25% by weight of the totality of packaging materials contained in packaging waste to be recycled with a minimum of 15% by weight for each packaging material.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to minimise the environmental impact of waste and promote recycling.
The Habitats Directive 1992 Directive 92/43/EEC on the conservation of natural habitats and of	Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.	No targets or indicators.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies	Include sustainability objectives to protect and maintain the natural environment and important landscape

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
wild fauna and flora			derived from the Directive contained in the NPPF. The Plan must be subject to Habitats Regulations Assessment in line with the Directive.	features.
The Nitrates Directive 1991 Directive 91/676/EEC on nitrates from agricultural sources.	Reduce water pollution caused or induced by nitrates from agricultural sources and prevent further such pollution.	Identification of vulnerable areas.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to reduce water pollution.
The Urban Waste Water Directive 1991 Directive 91/271/EEC concerning urban waste water treatment	Protect the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.	No targets or indicators.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to reduce water pollution.
European				
European Spatial Development Perspective (1999)	Economic and social cohesion across the community. Conservation of natural resources and cultural heritage. Balanced competitiveness between different tiers of government.	No targets or indicators.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to conserve natural resources and cultural heritage.
EU Seventh Environmental Action	The EU's objectives in implementing the programme are:	No targets or indicators.	Develop policies that take account of the	Include sustainability objectives to protect and

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
Plan (2002-2012)	 (a) to protect, conserve and enhance the Union's natural capital; (b) to turn the Union into a resource-efficient, green and competitive low-carbon economy; (c) to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing; (d) to maximise the benefits of the Union's environment legislation; (e) to improve the evidence base for environment policy; (f) to secure investment for environment and climate policy and get the prices right; (g) to improve environmental integration and policy coherence; (h) to enhance the sustainability of the Union's cities; (i) to increase the Union's effectiveness in confronting regional and global environmental challenges. 		Directive as well as more detailed policies derived from the Directive contained in the NPPF.	enhance the natural environment and promote energy efficiency.
European Landscape Convention (Florence, 2002)	The convention promotes landscape protection, management and planning.	No indicators or targets.	Ensure that site allocations and policies take account of the Convention.	Include sustainability objectives to protect the archaeological heritage.
European Convention on the Protection of the Archaeological Heritage (Valletta, 1992) Revision of the 1985 Granada Convention	Protection of the archaeological heritage, including any physical evidence of the human past that can be investigated archaeologically both on land and underwater. Creation of archaeological reserves and conservation of excavated sites.	No indicators or targets.	Ensure that site allocations and policies take account of the Convention.	Include sustainability objectives to protect the archaeological heritage.
International			· · · · · · · · · · · · · · · · · · ·	· -
Johannesburg Declaration on Sustainable	Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.	Greater resource efficiency. New technology for renewable energy.	Ensure that site allocations and policies take account of the	Include sustainability objectives to enhance the natural environment and

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
Development (2002)	Renewable energy and energy efficiency. Accelerate shift towards sustainable consumption and production.	Increase energy efficiency.	Declaration.	promote renewable energy and energy efficiency.
Aarhus Convention (1998)	Established a number of rights of the public with regard to the environment. Local authorities should provide for: The right of everyone to receive environmental information The right to participate from an early stage in environmental decision making The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.	No targets or indicators.	Ensure that site allocations and policies take account of the Convention.	Ensure that public are involved and consulted at all relevant stages of SA production.
NATIONAL				
National Planning Policy Framework	Presumption in favour of sustainable development. Delivering sustainable development by:	No targets or indicators.	Development plan has a statutory status as the starting point for decision making.	Sustainability appraisal should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.
	Building a strong, competitive economy.	No targets or indicators.	Set out clear economic visions for that particular area.	Include a sustainability objective relating to strengthening the economy.
	Ensuring vitality of town centres.	No targets or indicators.	Recognise town centres as the heart of their communities.	Include a sustainability objective relating to the vitality of town centres.
	Promoting sustainable transport	No targets or indicators.	To implement sustainable transport modes depending on nature/location of the site, to reduce the need	Include a sustainability objective relating to sustainable transport.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
			for major transport infrastructure.	
	Supporting high quality communications infrastructure.	No targets or indicators.	Enhance the provision of local community facilities and services by supporting the expansion of electronic communications networks.	Include a sustainability objective relating to improving communication.
	Delivering a wide choice of high quality homes.	No targets or indicators.	Identify size, type, tenure and range of housing that is required in particular locations.	Include a sustainability objective relating to housing availability and quality.
	Requiring good design.	No targets or indicators.	Establish a strong sense of place to live, work and visit.	Include a sustainability objective relating to good design.
	Promoting healthy communities.	No targets or indicators.	Promote safe and accessible environments with a high quality of life and community cohesion.	Include a sustainability objective relating to health and well-being.
	Protecting Green Belt Land.	No targets or indicators.	To prevent the coalescence of neighbouring towns.	Include a sustainability objective relating to the coalescence of towns.
	Meeting the challenge of climate change, flooding, and coastal change.	No targets or indicators.	Use opportunities offered by new development to reduce causes/impacts of flooding.	Include a sustainability objective relating to climate change mitigation and adaption.
	Conserving and enhancing the natural environment.	No targets or indicators.	Recognise the wider benefits of biodiversity.	Include a sustainability objective relating to the conservation and enhancement of the natural environment.
	Conserving and enhancing the historic	No targets or indicators.	Sustain and enhance	Include a sustainability

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
	environment		heritage assets and put them to viable uses consistent with their conservation.	objective relating to the conservation of historic features.
	Facilitating the use of sustainable materials.	No targets or indicators.	Encourage prior extraction of minerals where practicable and environmentally feasible.	Include a sustainability objective relating to sustainable mineral extraction.
National Planning Policy for Waste	Sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. Replaces Planning Policy Statement 10.	Delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy. Ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities. Providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in	The Local Plan should be in conformity with national waste planning policy.	Include a sustainability objective relating to waste generation and management.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
		the case of mixed municipal waste from households, recovered, in line with the proximity principle. Helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment. Ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high		
White Papers		quality collections of waste.		
Natural Environment White Paper, 2011 The Natural Choice: securing the value of nature	Protecting and improving our natural environment; Growing a green economy; and Reconnecting people and nature.	No targets or indicators.	Ensure that site allocations and policies will protect the intrinsic value of nature and recognise the multiple benefits it could have for communities.	Include a sustainability objective relating to the enhancement of the natural environment.
Electricity Market Reform White Paper 2011, Planning our Electric Future: A White Paper for Secure, Affordable and Low-	This White Paper sets out the Government's commitment to transform the UK's electricity system to ensure that our future electricity supply is secure, low-carbon and affordable.	15 per cent renewable energy target by 2020 and 80 per cent carbon reduction target by 2050.	Ensure that site allocations and policies will support renewable energy generation and encourage greater energy efficiency.	Include sustainability objectives to reduce carbon emissions and increase proportion of energy generated from renewable sources.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
Carbon Electricity				
Water White Paper, 2011 Water for Life	 Objectives of the White Paper are to: Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it; Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction; Keep short and longer term affordability for customers at the centre of decision making in the water sector; Protect the interests of taxpayers in the policy decisions that we take; Ensure a stable framework for the water sector which remains attractive to investors; Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs; Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs; and Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators. 	No targets or indicators.	Ensure that site allocations and policies will support the wise use of water, and improvement of water quality.	Include sustainability objectives that relate to water quality and quantity.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
The Future of Transport White Paper 2004: A network for 2030	Ensure we can benefit from mobility and access while minimising the impact on other people and the environment, now and in the future. Get the best out of our transport system without damaging our overall quality of life. Develop strategies that recognise that demand for travel will increase in the future. Work towards a transport network that can meet the challenges of a growing economy and the increasing demand for travel but can also achieve the government's environmental objectives.	20% reduction in carbon dioxide emissions by 2010 and 60% reduction by 2050. Transport is currently responsible for about a quarter of total emissions.	Allocate sites that facilitate public transport use rather than increasing reliance on the car, and ensure that policies promote the use of non-car based modes of transport.	Include sustainability objectives to reduce the need to travel and improve choice and use of sustainable transport modes.
Urban White Paper 2000, Our Towns and Cities: The Future – delivering an urban renaissance	New Sustainable homes that are attractive, safe and practical. Retaining people in urban areas and making them more desirable places to live. Improving quality of life, opportunity and economic success through tailored solutions in towns and cities.	3.8 million more homes needed by 2021. Local strategies needed to meet the needs of local people developed through partnerships. 60% of new homes on brownfield sites or through conversions of existing buildings.	Allocate sites that will effectively deliver better towns and cities taking into account the key aims of the White Paper.	Include sustainability objectives to ensure that the majority of new development will be built on brownfield sites and aim to improve the quality of life of residents.
Rural White Paper 2000, <i>Our Countryside:</i> The Future – a fair deal for rural England	Facilitate the development of dynamic, competitive and sustainable economies in the countryside. Maintain and stimulate communities and secure access to services for those who live and work in the countryside. Conserve and enhance rural landscapes. Increase opportunities for people to get enjoyment from the countryside.	No targets or indicators.	Allocate sites that will increase employment and services in the rural parts of the District whilst conserving the landscape.	Include sustainability objectives that aim to improve the economies of rural areas with minimal impact to the environment.
Policies and Strategies	l	T	I	
DCLG (2015) Planning Policy for Traveller Sites	Government's aims in respect of traveller sites are:	No targets or indicators.	Ensure that the relevant considerations	Include relevant sustainability objectives

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
	 That local planning authorities should make their own assessment of need for the purposes of planning. To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites. To encourage local planning authorities to plan for sites over a reasonable timescale. That plan-making and decision-taking should protect Green Belt from inappropriate development. To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites. That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies. To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply. To reduce tensions between settled and traveller communities in plan-making and planning decisions. To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure. For local planning authorities to have due regard to the protection of local amenity and local environment. 		are taken into account when allocating sites.	relating to social inclusion and environmental protection.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
DCLG (2011) Laying the Foundations: A Housing Strategy for England	Aims to provide support to deliver new homes and improve social mobility.	No targets or indicators	Make appropriate site allocations for the provision of an appropriate supply of new homes.	Include sustainability objective that assesses whether housing need is being met.
DEFRA (2011) Securing the Future: Delivering UK Sustainable Development Strategy	Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations. There are 4 shared priorities: sustainable consumption and production; climate change and energy; natural resource protection and environmental enhancement; and sustainable communities.	Sets out indicators to give an overview of sustainable development and priority areas in the UK. They include 20 of the UK Framework indicators and a further 48 indicators related to the priority areas.	Ensure that site allocations and policies meet the aims of the Sustainable Development Strategy.	Include sustainability objectives to cover the shared priorities.
Department of Health (2010) Healthy Lives, Healthy People: our Strategy for public health in England	Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest. Prioritise public health funding from within the overall NHS budget.	No targets or indicators.	Ensure that site allocations and policies reflect the objectives of the strategy.	Include a sustainability objective relating to health and well-being.
Kirklees Joint Health and Wellbeing Strategy 2014-2020 (Kirklees Health and Wellbeing Board, 2014)	This strategy provides a context, vision and overall focus for improving the health and wellbeing of local people and reduce inequalities at every stage of people's lives by 2020, identifies shared priorities and clear outcomes for improving local wellbeing and health inequalities, supports effective partnership working that delivers health improvements and provides a framework to support the innovative approaches required to enable change, given the changing needs of local people and the current economic climate. The vision is that, "No matter where they live, people in Kirklees live their lives confidently, in	No targets or indicators.	Ensure that site allocations and policies reflect the vision of the strategy.	Include sustainability objectives relating to health and well-being.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
	better health, for longer and experience less inequality".			
Leeds City Region Green Infrastructure Strategy (Leeds City Region Partnership, 2010)	This strategy sets out the vision for green infrastructure in the city region and to determine how future investment in green infrastructure will be secured and where investment should be targeted. The vision is that "Green infrastructure will shape the future economic, social and environmental success of the Leeds City Region by harnessing the potential of existing environmental resources to promote sustainable economic growth and to tackle climate change". Four strategic objectives have been selected to directly address the key drivers of green infrastructure including: • promote sustainable growth and economic development; • adapt to and mitigate climate change; • encourage health and wellbeing; and • improve biodiversity.	No targets or indicators.	Ensure that site allocations and policies reflect the vision and objectives of the strategy.	Include sustainability objectives relating to health and wellbeing, enhancement of open space, provision of sustainable transport, biodiversity and climate change.
Building a Greener Future: Policy Statement (DCLG, 2007)	This Statement confirms the government's intention to achieve 25% more energy efficient homes by 2010, 44% more efficient homes by 2013 and zero carbon (net carbon emissions should be zero per annum) homes by 2016.	25% more energy efficient homes by 2010, 44% more efficient homes by 2013 and zero carbon (net carbon emissions should be zero per annum) homes by 2016.	Policies should seek to promote zero carbon residential development.	Include SA objectives which seek to improve the energy efficiency of proposed developments and encourage uptake of renewable energy.
DECC (2009) The UK Renewable Energy Strategy Community Energy	Increase our use of renewable electricity, heat and transport, and help tackle climate change. Build the UK low-carbon economy, promote energy security and take action against climate change. Sets out plans to promote and facilitate the	15% of energy from renewable sources by 2020. Reducing UK CO2 emissions by 750 million tonnes by 2030. No targets or indicators.	Ensure that site allocations and policies will support renewable energy provision including electricity, heat and transport. Ensure that site	Include a sustainability objective relating to increasing energy provided from decentralised community renewable sources. Include a sustainability

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
Strategy (DECC, 2014)	 planning and development of decentralised community energy initiatives in four main types of energy activity: Generating energy (electricity or heat) Reducing energy use (saving energy through energy efficiency and behaviour change) Managing energy (balancing supply and demand) Purchasing energy (collective purchasing or switching to save money on energy) 		allocations and policies will support community low carbon and renewable energy provision including electricity, heat and transport.	objective relating to increasing energy provided from decentralised low carbon and renewable sources.
The Energy Efficiency Opportunity in the UK (DECC, 2012)	This is an Energy Efficiency Strategy aiming to realise the wider energy efficiency potential that is available in the UK economy. The Strategy identifies four barriers to energy efficiency which need to be overcome which include: • Embryonic markets. • Information. • Misaligned financial incentives. • Undervaluing energy efficiency. The Strategy draws attention to maximising the potential of existing dwellings by implementing 21 st century energy management initiatives on 19 th century homes.	No targets or indicators.	Policies should seek to address the barriers identified within the Strategy and improve the existing building stock through appropriate adaptation measures.	Include SA objectives relating to energy efficiency and adaptation of the existing building stock.
The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)	 The report sets out visions for the following sectors: Built Environment – "buildings and places and the people who live and work in them are resilient to a changing climate and extreme weather and organisations in the built environment sector have an increased capacity to address the risks and take the opportunities from climate change". Infrastructure – "an infrastructure network 	No targets or indicators.	Policies should take account of the aims of the Programme.	Include SA objectives which seek to promote the implementation of adaptation measures to make the area more resilient to a changing climate.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
	that is resilient to today's natural hazards and prepared for the future changing climate". • Healthy and resilient communities – "a health service, a public health and social care system which are resilient and adapted to a changing climate. Communities and individuals, including the most vulnerable, are better prepared to cope with severe weather events and other impacts of climate change. Emergency services and local resilience capability take account of and are resilient to, a changing climate". • Agriculture and Forestry – "profitable and productive agriculture and forestry sectors that take the opportunities from climate change, are resilient to its threats and contribute to the resilience of the natural environment by helping maintain ecosystem services and protect and enhance biodiversity". • Natural Environment – "the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides". • Business – "UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change". • Local Government – "Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate".			

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
The National Flood and Coastal Erosion Risk Management Strategy for England (Environment Agency, 2011)	This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to: "manage the risk to people and their property; Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national; Achieve environmental, social and economic benefits, consistent with the principles of sustainable development".	No targets or indicators.	Policies should seek to reduce and manage the risk of all types of flooding.	The SA framework should include objectives which seek to reduce the risk and manage flooding sustainably.
DEFRA (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland	Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life. Render polluting emissions harmless.	Sets air quality standards for 13 air pollutants.	Ensure that site allocations and policies will contribute to maintaining and improving air quality.	Include sustainability objectives to protect and improve air quality.
Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy (HM Government, 2013)	The aim of the Programme is to improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth: • encourage businesses to contribute to a more sustainable economy by building waste reduction into design, offering alternative business models and delivering new and improved products and services; • encourage a culture of valuing resources by	No targets or indicators.	Policies should take account of the strategic measures in the Programme.	Include SA objectives which seek to promote waste prevention.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
	 making it easier for people and businesses to find out how to reduce their waste, to use products for longer, repair broken items, and enable reuse of items by others; help businesses recognise and act upon potential savings through better resource efficiency and preventing waste, to realise opportunities for growth; and support action by central and local government, businesses and civil society to capitalise on these opportunities. 			
Future Water: The Government's Water Strategy for England (DEFRA, 2008)	Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there. The vision for 2030 is one where we, as a country have: "improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps; Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water; Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges; Cut greenhouse gas emissions; and Embed continuous adaptation to climate change and other pressures across the water industry and water users".	No targets or indicators.	Policies should aim to contribute to the vision set out in this Strategy.	Include SA objectives which seek to protect, manage and enhance the water environment.
Water for People and	The Strategy vision for water resource "is for	No targets or indicators.	Policies should reflect	Include SA objective which
the Environment: Water	there to be enough water for people and the		the aims of the strategy	seeks to promote water
Resources Strategy for	environment, meeting legitimate needs".		where relevant.	management and

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
England and Wales (Environment Agency, 2009)	 Its aims include: To manage water resource and protect the water environment from climate change. Restore, protect, improve and value species and habitats that depend on water. To contribute to sustainable development through good water management. People to understand how water and the water environment contribute to their quality of life. 			efficiency.
Humber District River Basin Management Plan (Environment Agency, 2009)	The plan describes the river basin District, and the pressures that the water environment faces. It explains what this means for the current state of the water environment, and what actions will be taken to address the pressures. It sets out what improvements are possible by 2015, the end of the first Water Framework Directive Cycle, and how the actions will make a difference to the local environment – the catchments, the estuaries and coasts, and the groundwater.	By 2015, 14% of surface waters (rivers, lakes, estuaries and coastal waters) in the river basin District are going to improve for at least one biological, chemical or physical element. 19% of surface waters will be at good or better ecological status/potential and 32% of groundwater bodies will be at good status by 2015. At least 29% of assessed surface waters will be at good or better biological status by 2015.	Policies should seek to manage and improve water quality in the District.	Include SA objective which seeks to protect and enhance water quality
Aire and Calder Abstraction Licensing Strategy (Environment Agency, 2013)	This strategy sets out how the Environment Agency will manage water resources in the Aire and Calder catchment and provides information on how existing abstraction licences and water availability for further abstraction will be managed. The objectives of the strategy are to contribute to the Water Framework Direct by: • providing a water resource assessment of	No targets or indicators	Policies should reflect the objectives of the strategy where relevant and support the protection and enhancement of water quality and its efficient use.	Include SA objective which seeks to protect and enhance water quality and ensure the efficient use of water.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
	rivers, lakes, reservoirs, estuaries and groundwater referred to as water bodies under the WFD; • identifying water bodies that fail flow conditions expected to support good ecological status; • preventing deterioration of water body status due to new abstractions; and • providing results which inform River Basin Management Plans (RBMPs).			
Kirklees Preliminary Flood Risk Assessment (Kirklees District Council, 2009)	The Preliminary Flood Risk Assessment provides a high-level overview of flood risk from local sources, such as surface water, ordinary watercourses and groundwater, but excludes flooding from main rivers, the sea and reservoirs, which is the responsibility of the Environment Agency. The evidence provided in the report has fed into the Kirklees Local Flood Risk Management Strategy.	No targets or indicators	Policies should seek to manage and improve flood risk across the District, and prevent development from being exposed to high levels of flood risk.	Include SA objective which seeks to prevent inappropriate new development in high flood risk areas and ensure that new development does not cause flooding.
Kirklees Flood Risk Management Strategy	The Flood and Water Management Act (FWMAct) 2010 requires the Environment Agency to publish a National Strategy for Flood and Coastal Erosion Risk Management and Lead Local Flood Authorities a Local Strategy for Flood and Coastal Erosion Risk Management. The Kirklees Local Flood Risk Management Strategy provides the framework to ensure that the type and scale of local flooding is understood and explained, appropriate objectives have been set, measures to achieve the objectives have been determined and funding arrangements, including value for money for the measures, has been considered. The objectives include:	32 measures have been developed to address the objectives identified in the strategy. The measures are varied in nature, ranging from simple data recording to complex flood modelling, community information to changing community behaviour/perceptions.	Policies should seek to manage and improve flood risk across the District, and prevent development from being exposed to high levels of flood risk.	Include SA objective which seeks to prevent inappropriate new development in high flood risk areas and ensure that new development does not cause flooding.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
Safeguarding our Soils: A Strategy for England (DEFRA, 2009)	 Improving the level of understanding of local flood risk Ensuring that local communities understand their responsibilities Actively managing flood risk from new developments Balancing economic, environmental and social benefits in managing local flood risk Improving the capacity of existing drainage systems through targeted maintenance Encouraging responsible maintenance of privately-owned drainage assets Identifying affordable improvement programmes, maximising external funding contributions Aligning local flood risk management knowledge with the Councils emergency planning procedures The vision is "by 2030, all England's soils will be managed sustainability and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations". The Strategy highlights the areas for priority including: Better protection for agricultural soils. Protecting and enhancing stores of soil carbon. Building the resilience of soils to a changing climate. Preventing soil pollution. Effective soil protection during construction and development. Dealing with our legacy of contaminated 	No targets or indicators.	Ensure that site allocations and policies will help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations.	Include SA objective which seeks to safeguard and enhance the quality of soil.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
	land.			
The Code for Sustainable Homes: Setting the standard in sustainability for new homes (DCLG, 2008)	The Code is a standard designed to improve the sustainability of new homes. This sets out the assessment process and performance standards required for the Code for Sustainable Homes. In January 2014 the Government responded to the Environmental Audit Committee's report on the Housing Standards Review consultation, stating that necessary standards would, as far as possible, be consolidated into Building Regulations.	No targets or indicators.	Develop policies that promote the implementation of the Code (or corresponding sustainability requirements in the Building Regulations) for all residential development.	Include SA objectives which promote sustainable development and seek to achieve higher levels of efficiency (e.g. in energy, water etc.) where appropriate.
DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services	The strategy aims to guide conservation efforts in England up to 2020, and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors: • Agriculture; • Forestry; • Planning and Development; • Water Management; • Marine Management; • Fisheries; • Air Pollution; and Invasive Non-Native Species.	The strategy develops ambitious yet achievable goals for 2020 and 2050, based on Aichi Targets set at the Nagoya UN Biodiversity Summit in October 2010.	Develop policies that promote conservation and enhancements of biodiversity and ensure that site allocations take account of the aims of the strategy.	Include sustainability objective that relates to biodiversity.
Kirklees Biodiversity Strategy (Kirklees Council, undated)	 The aim of the Strategy is to "halt and reverse the decline in biodiversity". The key objectives identified by the Strategy include: To inform key partners, landowners and the private sector of the importance of land management for biodiversity and, its role in addressing and mitigating the effects of climate change. 	No targets or indicators.	Develop policies that promote conservation and enhancement of biodiversity and ensure that site allocations take account of the objectives of the strategy.	Include sustainability objective that relates to biodiversity.

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
Kirklees Biodiversity Action Plan (Kirklees	 To ensure that biodiversity is addressed and taken into account in the delivery of all relevant council services and the council is compliant with National Performance Indicator 197 (the positive conservation management of Local Sites). To support biodiversity work in the wider District. The strategy outlines the approach to meeting the targets for Habitats and Species of Principal Importance as set out in the Kirklees Biodiversity Action Plan. The Kirklees BAP identifies the local habitats and species of principal importance (also 	Specific objectives and targets have been set for the	Develop policies that promote conservation	Include sustainability objective that relates to
Council, undated)	known as priority habitats and species). These are the species and habitats taken from the UK National Biodiversity Action Plan that occur in Kirklees or those that are of sub-regional importance. These habitats and species have individual action plans to enable biodiversity work to be prioritised in the District.	priority habitats and species in the individual habitat and species action plans.	and enhancement of biodiversity, and ensure that site allocations take account of these species and habitats and the objectives and targets set out in the habitat and species action plans.	biodiversity.
DfT (2013) Door to Door: A strategy for improving sustainable transport integration	The strategy's vision is for an inclusive, integrated and innovative transport system that works for everyone, and where making door-to-door journeys by sustainable means is an attractive and convenient option. Four key areas to address are highlighted: • improving availability of information; • simplifying ticketing; • making connections between different steps in the journey, and different modes of transport, easier; and providing better interchange facilities.	No targets or indicators.	Ensure that site allocations and policies will enhance public transport provision and encourage active modes of travel such as walking and cycling.	Include a relevant sustainability objective relating to sustainable transport.
Legislation	providing better interchange facilities.			

Strategy, Plan or Programme	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
Housing Act 2004	Protect the most vulnerable in society and help create a fairer and better housing market. Strengthen the Government's drive to meet its 2010 decent homes target.	No indicators or targets.	Ensure that site allocations and policies will help to create a fairer and better housing market.	Include sustainability objectives to improve access to good quality and affordable housing.

Appendix 3

Baseline Information

- 1. Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.
- 2. Annex 1 of the SEA Directive requires information to be provided on:
 - (a) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;
 - (b) the environmental characteristics of areas likely to be significantly affected;
 - (c) any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive'].
- 3. Baseline information that was collated for the SA of the now-withdrawn Core Strategy (most recently presented in the September 2012 SA report for the Core Strategy) has been used as the starting point. However, it has been substantially revised and updated to make use of the most recent available information sources.
- 4. Data referred to have been chosen primarily for regularity and consistency of collection, in order to enable trends in the baseline situation to be established, and also subsequent monitoring of potential sustainability effects. There are a number of studies and evidence documents that are currently being prepared by or for the Council and these will be drawn from when the baseline information is updated during later stages of the SA, once they have become available.

Baseline information

Administrative context

- 5. Kirklees Council covers an area of 40,860 hectares in West Yorkshire. The authority is diverse comprising urban conurbations in the north and west, which contain the majority of the population, and large areas of green belt within the south. The south west part of Kirklees falls within the Peak District National Park.
- 6. The road and rail network provides good links to the surrounding cities of Manchester, Leeds, Bradford and Sheffield, with wider reaching connections provided via the M62 and the M1.

Population

- 7. The resident population of Kirklees in 2013 was 428,279 people. Of those, 49% were male and 51% were female. By 2023 the population of Kirklees is predicted to reach 456,200²⁰.
- 8. In 2011 the mean age of the Kirklees population was 38.4 years. This compared to an England and Wales average of 39.3 years²¹. In 2011, 15.8% of the resident population in Kirklees were of retirement age (65 and over for males or 60 and over for females) compared with 19.3% in England and Wales.
- 9. Kirklees has a population density of 10.3 persons per hectare²². This has increased from the 2001 Census when the density was 9.5 persons per hectare. Overall the population density of Kirklees is higher than the England and Wales average (3.7 persons per hectare) and below the West Yorkshire average (11 persons per hectare).
- 10. In the 2011 census results²³ 79.1% of the Kirklees population was classed as white, with black and minority ethnic communities accounting for approximately 20.9% of the population.

²⁰ Kirklees Factsheet 2014: Population and Households.

²¹ ONS (2011). Table KS102UK Age Structure.

²² ONS (2011). Table KS101UK Usual Resident Population.

²³ ONS (2011). Table KS201UK Ethnic Group.

Health

- 11. The health of people in Kirklees is varied compared with the England average. Deprivation is higher than average and about 20% (17,000) children live in poverty. Life expectancy for both men and women is lower than the England average²⁴.
- 12. Overall the health standards of people within Kirklees are lower than those nationally. There are a large number of health inequalities within Kirklees, some of which are influenced by social determinants of health, such as housing quality; access to green open spaces; access to leisure opportunities and services; good quality air; access to opportunities to enable safe, active travel; access to health services and employment opportunities. Health inequalities are worst in Dewsbury, Batley and Huddersfield South²⁵.

13. Key indicators include:

- Men in Kirklees live 9.1 years less in the most deprived areas than those in the least deprived. Women live 5.9 years less
- 18.4% of year 6 children are classified as obese
- 21.8% of adults are classified as obese
- 55.8% of adults meet the recommended physical activity levels
- 149 people were killed or seriously injured on Kirklees roads per year between 2010-2012
- There were 177 excess winter deaths in Kirklees between 2009-2012
- 19% of adults in Kirklees eat fast food or takeaway meals at least once a week
- 14. Therefore, priority needs to be given to the following:
 - Obesogenic environment
 - Access to physical activity opportunities
 - · Good quality, warm, safe, housing
 - Being/feeling safe
 - Social connectedness
 - Access to good quality food²⁶

Housing

- 15. In 2013/14, housing delivery numbers were 1,036, with 70.45% of these on previously developed land. In the previous year, there were 753 housing completions, 70.4% of which were on brownfield sites²⁷.
- 16. There is an identified need for affordable housing provision within the District. This is because average earnings are lower than the national and regional average. The main identified needs are for households on low incomes requiring social rented housing and for provision within rural communities where house prices are highest. In the Strategic Housing Market Assessment for Kirklees in 2012, the affordable housing need in Kirklees is 1,457 houses per annum. In the private sector housing stock, 37,830 homes, or 25.6% were classified as non-decent and 16% were classified as having a Category 1 Hazard, which are regarded as potentially serious hazards to health and safety. There are also 3,585 homes across Kirklees recorded on council tax records as long term empty properties.²⁸
- 17. An updated Strategic Housing Market Assessment is due to be published by Kirklees Council by the end of March 2015, the findings of which will be taken into account during future iterations of Local Plan and the SA.

²⁴ PHE (2014) Kirklees Unitary Authority: Health Profile

²⁵ PHE (2014) Kirklees Unitary Authority: Health Profile

²⁶ PHE (2014) Kirklees Unitary Authority: Health Profile

²⁷ Kirklees Council (2013) Annual Monitoring Report 2013/14.

²⁸ Kirklees Council (May 2012) Kirklees Strategic Housing Market Assessment

Employment & Economic Activity

- 18. The percentage of economically active people in Kirklees is currently 72.3%²⁹. This is below the British average of 77.5%. The unemployment rate of 8.5% of the economically active population (Oct 2013-Sep 2014) was higher than the regional average of 8.1% and remained above the British average of 6.5%³⁰. However, the number of people claiming Jobseeker's Allowance as a percentage of the working age resident population has reduced from 4.6% in June 2012 to 3.1% in June 2014³¹. In January 2015, there were 7,283 Jobseeker's Allowance claimants in Kirklees which is a further reduction to 2.7% of the population³². Of Kirklees jobseekers, 25% are aged between 18 and 24³³. The gross weekly earnings of full time employees in 2014 was £479.60 compared to £520.80 across the UK as a whole³⁴.
- 19. The three main employment sectors in Kirklees in September 2014 were professional occupations (18.4%), elementary occupations (12.8%) and associate, professional and technical occupations $(12.4\%)^{35}$.
- 20. Of the 12.505 enterprises within Kirklees in 2014, 86.8% were considered as 'micro' size (0-9 employees), 1.9% were considered to be 'medium' size (50-249 employees) and 0.4% were considered to be 'large' size (250+ employees)³⁶

Education, Skills and Training

- 21. In the academic year 2014/14, 56% of all 15 year old state-school pupils attained at least five GCSEs graded A* to C, including English and Mathematics. This compares with a national figure of 56.6%³⁷. This figure has decreased notably since the previous year, when 62.7% of state school pupils in Kirklees and 60.6% nationally achieved at least five GCSEs graded A* to C, including English and Mathematics.
- 22. Statistics from December 2013 show that the proportion of adults in Kirklees who have attained qualification levels equivalent to NVQ level 4 and above (31%) is slightly above the regional average of 30% but lower than the national average of 35%³⁸. Kirklees has a slightly lower percentage of people aged 16-74 with no qualifications (12.7%) than the Yorkshire & Humber region (10.4%) but is above the 9.3% recorded for England as a whole.
- 23. Within Kirklees there are 204 schools distributed across the District. These are broken down into; nursery/primary (170), secondary (47), and 16-18 (15)³⁹. Huddersfield University provides main tertiary education provision within Kirklees, catering for over 24,000 students.

Crime and Security

- 24. The Kirklees Safer Communities Partnership identifies that fear of crime has a significant impact on people's quality of life; however it must be noted that fear of crime is not necessarily linked to an individual's likelihood to become a victim of crime. Kirklees residents identify crime and disorder issues as one of the key factors impacting on their quality of life.
- 25. The Kirklees local residents' survey 2011⁴⁰ indicated that 76% of residents were satisfied with their local area; however this proportion is significantly lower in the Dewsbury area at 56%. People in the Dewsbury area also felt less safe than people in the rest of the District, with only 39% feeling safe after dark compared to 50% across Kirklees as a whole.

²⁹ ONS: Labour Market Profile: Kirklees: Accessed in February 2015.

³⁰ ONS: Labour Market Profile: Kirklees: Accessed in February 2015.

³¹ http://www.kirklees.gov.uk/you-kmc/information/pdf/localEconomy.pdf

³² ONS: Labour Market Profile: Kirklees: Accessed in February 2015.

³³ Department for Education. Secondary School Performance Tables 2013 Kirklees.

³⁴ ONS: Labour Market Profile: Kirklees: Accessed in February 2015.

³⁵ ONS: Labour Market Profile: Kirklees: Accessed in February 2015.

³⁶ ONS: Labour Market Profile: Kirklees: Accessed in February 2015.

 $^{^{}m 37}$ Department for Education. Secondary School Performance Tables 2013 Kirklees.

³⁸ Nomis Official Labour Market Statistics. Accessed February 2015.

³⁹ Department for Education. Secondary School Performance Tables 2013 Kirklees.

⁴⁰ Kirklees District Council. Kirklees local residents' survey 2011,

26. Following sustained reductions over the past few years, levels of recorded crime in Kirklees continue to decrease. National Statistics for the year 2012/13 illustrate that occurrences of notable offences showed a decrease upon the previous year across all categories excluding sexual offences⁴¹.

Culture, Sport and Leisure

- 27. Within Kirklees, there are 33 parks which include facilities such as children's play spaces, tennis courts, bowling greens and sports pitches⁴² which have a wide range of benefits, including for public health. In addition, these types of facility also exist outside the formal park environment. Generally there is a reasonable distribution throughout Kirklees but there is the inevitable concentration in the larger towns where there are also examples of further specialist resources. In addition there are three purpose-built sports halls and further facilities within secondary schools that are available for public use.
- 28. The majority of purpose built commercial leisure and cultural facilities are contained within the main towns, particularly Huddersfield. To broaden the resource availability, Council-owned buildings (particularly town halls) do provide a range of concerts and events. A greater range of facilities are available in the neighbouring cities.
- 29. It is estimated that 11.5m visitors (of which 94% are day visitors) generate £320m of tourism expenditure in Kirklees annually⁴³. The majority of the visitors are concentrated in parts of Kirklees that have television or literary association i.e. within the Pennine fringe (Holme and Colne Valleys), Oakwell and Gomersal.

Environment, Biodiversity and Natural Resources

- 30. The landscape of the District is distinctive and ranges from the high wind swept moors of the South Pennines in the west, through the central plateau that dips down towards the east and which is incised by river valleys to produce characteristic steep gritstone edges, whilst to the north the land is described by a large number of individual settlements separated by tracts of agricultural pasture lands. Despite a population of approximately 400,000 people there is little coalescence of settlements, primarily due to the physical landscape.
- 31. The District falls within four National Character Areas (NCAs)⁴⁴: NCA 36: Southern Pennines, NCA 37: Yorkshire Southern Pennine Fringe, NCA 38: Nottinghamshire, Derbyshire and Yorkshire Coalfield and NCA 51: Dark Peak. The landscape within NCA 36 in the western part of the District is characterised by large-scale sweeping moorlands, pastures enclosed by drystone walls, and settlements of gritstone buildings contained within narrow valleys. The area also contains internationally important mosaics of moorland habitats which support rare birds such as merlin, short-eared owl and twite. NCA 37 in the central part of the District is a transitional landscape from the upland areas of the Southern Pennines NCA in the west through to the low-lying land of the Nottinghamshire, Derbyshire and Yorkshire Coalfield NCA to the east. In this area the predominantly 'gritstone' industrial towns and villages mix with the strong valley forms and pastoral agriculture of the Pennine foothills. In NCA 38 in the eastern part of the District there has been significant landscape change over the past few centuries as a result of widespread industrialisation and development, which took place in the area because of geological deposits of coal and iron and the good water supply. This has influenced the visual and ecological landscape. NCA 51 in the south western part of the District is a landscape of large-scale sweeping moorlands, in-bye pastures enclosed by drystone walls, and gritstone settlements, within the Pennine chain. It falls almost entirely within, and forms a large part of, the Peak District National Park. Approximately 46% of the area has been designated as a Special Protection Area and Special Area of Conservation.
- 32. The south western parts of the District's upper moorland form 10% of the Peak District National Park with much of the remainder being within the much larger South Pennine Heritage Area. Furthermore these moorlands provide a range of habitats and contain a number of species that

 $^{^{41}}$ ONS Neighbourhood Statistics. Notifiable Offences Recorded by the Police. Accessed August 2014.

⁴² Kirklees Council Open Space Study Strategy Recommendations. Revised 2010.

⁴³ Kirklees Council. Kirklees Local Economic Assessment 2010/11.

⁴⁴ Natural England, National Character Area profiles: data for local decision making, Accessed May 2015

- have ecological significance of European importance and form part of the South Pennines Special Area of Conservation and the Special Protection Area.
- 33. In addition to the Special Area of Conservation and Special Protection Area, the District contains five further Sites of Special Scientific Interest (4872.5 ha), three of which are classed as being in 'favourable' condition and two as being in 'unfavourable recovering' condition. In addition there are 45 Sites of Wildlife Significance (410 ha) and 84 Biodiversity Action Plan sites (also known as priority habitats) (679.6 ha). The Council has itself designated nine Local Nature Reserves, the majority of which are within or very close to settlements within the District.
- 34. Compared to the national average of 12%, Kirklees has only around 6% of its land area devoted to tree cover. Most of these tend to be to the south of Huddersfield town centre stretching out through the Holme and Dearne Valleys.
- 35. Most agricultural activity within the District relates to cattle and sheep rearing with some milk production and intensive poultry rearing. There is no significant arable production. As a result the agricultural landscape is one of intensive grassland within fields that contain few natural field boundaries. It is a deteriorating landscape particularly around the edges of most of the settlements. Farm buildings are being converted into dwellings, horse grazing is increasing, and management is declining with some fields just being abandoned as agricultural incomes continue to decline.
- 36. The historic association with coal mining particularly in the eastern parts of the District has left few relics of association. The only mineral activities are four clay and shale quarries, two small sand and gravel quarries in the Calder Valley near to Mirfield and Dewsbury and two large and seven small or medium sized stone quarries. One of the larger stone quarries has a national reputation for dimension building stone and flags. The extent of stone extraction was historically much more extensive as is evident by the wide distribution of now abandoned quarries most of which are overgrown.

Historic Environment

37. Kirklees has some 3,000 Listed Buildings - the highest number of any local planning authority in the region. Of these, 20 are on the Heritage at Risk register⁴⁵. Huddersfield, which is home to a particularly fine set of Victorian public and commercial buildings, has the third highest number of listed buildings of any town or city in England. In addition, there are 59 Conservation Areas (the third highest number of Conservation Areas in Yorkshire - four of these are classed as being 'at risk'), five Historic Parks and Gardens (none of which are at risk), 19 Scheduled Monuments (four of which are at risk) and the District contains part a Registered Battlefield at Adwalton Moor. This site is also included on the Heritage at Risk Register.

Waste

- 38. During the period 2013/14 a total of 204,003 tonnes of Local Authority Collected Waste (LACW) was generated in Kirklees⁴⁶. This increased from 195,046 the previous year. 32.3% of waste was recycled or composted, down from 34.2% in the year 2012/13. The majority of the non-recycled/composted household waste is converted to electricity in the Huddersfield Vine Street Waste to Energy from Waste (EfW) Plant). The council landfilled approximately 6.9% of its LACW in 2013/14 which was an increase from 5.4% the previous year⁴⁷.
- 39. Approximately 97% of Kirklees households have access to the green bin scheme with mixed dry recyclables being collected from the kerbside, now mainly on a two-weekly basis. The Council currently provides a kerbside collection of glass to approximately 125,000 households on a monthly/four-weekly cycle. There is an ongoing publicity campaign to increase awareness of the need to reduce household waste and increase recycling which incorporates environmental education in schools⁴⁸.

 $^{^{}m 45}$ Historic England. Heritage at Risk Register. Accessed February 2015.

⁴⁶ Annual Monitoring Report 2013/14. Kirklees Council

⁴⁷ Annual Monitoring Report 2013/14. Kirklees Council

⁴⁸ Kirklees Local Flood Risk Management Strategy (2013).

Climate Change and Energy Efficiency

40. The Council recognises that Climate Change will impact upon the citizens and businesses of Kirklees and is taking action to address this through implementing various measures. Government targets place requirements upon the Council to act to reduce greenhouse gas emissions. The Energy White Paper set out a 60% reduction in emissions by 2050. The key objectives of the Council's 2025 Environment Vision are to reduce greenhouse gases, raise the environmental standards of buildings and develop a green network. This includes reducing carbon dioxide emissions by greater than 30% by 2020 from a 2005 baseline. The DECC figures⁴⁹ for District emissions are set out in **Table A3.1** below:

Table A3.1: Source of CO₂ Emissions in Kirklees 2009-2012

Year	Industry and Commercial (kt CO ₂)	Domestic (kt CO ₂)	Transport (kt CO ₂)	Total (kt CO₂)
2009	882	899	673	2,594
2010	942	969	672	2,539
2011	855	857	669	2,434
2012	793	945	658	2,390

- 41. Over the last 17 years Kirklees Council has undertaken many actions to reduce the emissions of greenhouse gases from its own buildings and those in the District, while also carrying out measures to tackle fuel poverty. There is considerable potential for reducing greenhouse gas emissions through improvements in the energy efficiency of housing stock. During the 1990's Kirklees Council identified that affordable warmth was one of the primary objectives of its tenants, and with limited resources funded an Energy Unit to develop policies and target investment to reduce the effects of climate change and fuel poverty within the domestic sector.
- 42. To continue the work and embed the message of the need to provide thermal comfort and alleviate fuel poverty, Kirklees Council has embarked on a coordinated approach to address the problems of cold and damp homes. In partnership with the local Energy Efficiency Advice Centre, Kirklees Council has undertaken schemes such as Keep Warm and Warm Homes Kirklees to improve energy efficiency in homes. The Kirklees Warm Zone was a Kirklees Council initiative, which began in the autumn of 2005. Between 2007 and 2010 it was the largest local authority home insulation scheme in the UK and the first to offer free loft and cavity wall insulation to every suitable property in Kirklees. The Warm Zone aimed to improve the thermal comfort and energy efficiency of homes over a three year period. In terms of resident engagement and insulation measures delivered it exceeded expectations:
 - 133,746 homes assessed
 - 51, 155 homes insulated
 - 64,472 insulation measures installed
 - 45,875 Households requested support from other partner agencies
 - 105,913 MWh projected energy saving for households each year(assumes 50% potential savings taken in comfort rather than actual energy reduction)
 - £732,669 confirmed additional benefit claims secured for residents.
 - 126 direct FTE jobs created.
 - f249 million net economic benefit calculated.

⁴⁹ Local Authority carbon dioxide emissions 2005-2012. DECC.

- 43. All council buildings use renewable energy supplied via the national grid and since 1990 a 30% reduction on carbon dioxide emissions has been achieved. The council is currently working towards reducing emissions by a further 30% by 2020. All the energy used for powering street lights and signs is provided by 100% combined heat and power (CHP).
- 44. The increased use of renewable technologies for energy production is actively supported by Kirklees Council. However, it is recognised the use of such technologies can have an impact upon our landscape and biodiversity. Wind technology in particular is often subject to criticisms related to the siting of turbines. The majority of the renewable installations that have taken place within our District have been at the domestic or small scale. The Council has participated in two studies to increase the understanding of the opportunities and constraints to renewable and low carbon energy production in the District, namely the Landscape Capacity study for Wind Energy Developments in the South Pennines⁵⁰ and the Renewable and Low Carbon Energy Study⁵¹.

Air and Water

- 45. The Environment Act 1995 introduced the National Air Quality Strategy and the requirement for local authorities to determine if statutory air quality objectives (AQOs) are likely to be exceeded. All local authorities now report to DEFRA on an annual basis, and have the obligation to declare Air Quality Management Areas and develop action plans for improvement of air quality if objectives are likely to be exceeded.
- 46. Air quality in Kirklees is generally good and the industrial contribution to air pollution has declined. The pollution derived from road traffic gives rise to areas where statutory limits may be exceeded if traffic increases. There is a balance between improved engine performance resulting in reduced exhaust emissions and an increase in vehicle numbers on the road.
- 47. Areas that are deemed to be at risk of exceeding AQOs have been identified in Kirklees' annual reports to DEFRA and in the West Yorkshire Local Transport Plan. These are the A62 corridor, the M62 corridor, the Huddersfield central area and the Dewsbury area (including Ravensthorpe and Mirfield). Kirklees' air pollution monitoring network focuses on these areas. One Air Quality Management Area (AQMA) was declared at the Leeds Road A62/Bradley Road junction in October 2008⁵². A second AQMA at the A644 was scheduled in March 2009⁵³. The Local Transport Plan will continue to monitor for further areas of concern.
- 48. The Water Framework Directive (WFD) objectives are to prevent deterioration of waterbodies and to improve them such that they meet the required status for that given waterbody (rivers, lakes, estuaries, coastal and groundwaters). The majority of waterbodies in Kirklees have been classed as moderate status and as such are failing to meet the WFD standards. The River Holme from Mag Brook to River Colne and Fenay Beck from source to River Colne are the worst failing waterbodies in Kirklees.
- 49. The risk of flooding within the District has been determined through the production of a Strategic Flood Risk Assessment which has identified areas of potential flood risk, particularly around the rivers Colne (north-east of Huddersfield) and Calder (east of Mirfield and south of Dewsbury) where there are large areas of flood zones 2 and 3. Across the District there are other smaller areas of flood zones 2 and 3, particularly around Fenay Beck (east of Almondbury), river Holme (south of Huddersfield), river Colne (south-west of Huddersfield) and the river Spen around Heckmondwike.

Traffic, Transport and Accessibility

50. The 2011 census⁵⁴ indicates that 73.6% of households in Kirklees have access to one or more cars compared to 74.2% in England and Wales, which is an increase of 3.6% on the 2001 census figure. The number of households with two or more cars in Kirklees equates to 30.8% compared to 32% in England & Wales.

 $^{^{50}}$ JMA & LUC. 2014. Landscape Capacity Study for Wind Energy Developments in the South Pennines (updated).

⁵¹ Malsen. 2010. Renewable and Low Carbon Energy Study

 $^{^{\}rm 52}$ Defra. Online database of AQMAs. Accessed February 2015

⁵³ Defra. Online database of AQMAs. Accessed February 2015

⁵⁴ ONS (2011). Table KS404EW Car or van availability.

- 51. The 2011 census highlights that in Kirklees, 71.9% of all people employed aged between 16 and 74 travel to and from work by car/van either as a driver or passenger⁵⁵. People using public transport accounts for 10.9% of commuters.
- 52. Given the nature of the settlement pattern of Kirklees it is not surprising there are a number of small settlements in the west and south which have only very limited direct access to facilities such as post offices, food shops and doctors surgeries. However, nearly all such settlements have a primary school within them and most have an hourly daytime bus service to surrounding towns where such facilities exist.
- 53. In 2013 there were 13 fatalities on the roads of Kirklees, and 1,202 injuries. Fatality rates from traffic accidents are in line with the national average while injury rates are slightly lower⁵⁶.

 $^{^{55}}$ Nomis official labour market statistics. Table QS701EW - Method of travel to work. Accessed August 2014.

⁵⁶ Kirklees Fact Sheet 2014: Environment

Appendix 4

Assumptions used in the SA of Site Options

Table A4.1: Assumptions for SA of residential site options

SA Objectives	SA Assumptions
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	While the <u>location</u> of housing sites will not influence the number, location or type of employment opportunities available in Kirklees, the proximity of housing to employment nodes can affect people's ability to access jobs.
	 Housing sites that are within 0-20 minutes journey time (via non-car based modes of transport) of an employment node will have a significant positive (++) effect.
	 Housing sites that are within 20-30 minutes journey time (via non-car based modes of transport) of an employment node will have a minor positive (+) effect.
	 Housing sites that are within 30-40 minutes journey time (via non-car based modes of transport) of an employment node will have a negligible (0) effect.
	 Housing sites that are within 40-50 minutes journey time (via non-car based modes of transport) of an employment node will have a minor negative (-) effect.
	Housing sites that are more than 50 minutes journey time (via non-car based modes of transport) from an employment node will have a significant negative () effect.
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	The <u>location</u> of housing sites will not affect the success of the local economy. While housing development may result in job creation during the construction phase, this will not be influenced by the location of the development. Housing provision may also affect the size and location of the local workforce; however this is considered separately under SA objective 1 above. Therefore, the effects of all residential site options will be negligible (0).
3. Ensure education facilities are available to all.	The effects of housing development on this objective will depend to some extent on the availability of school and college places to serve the growing population - this will depend in part on whether new places are provided as part of the new housing development, which is unknown at this stage.
	Effects will also depend on how accessible existing schools and colleges are from residential site options, although there are uncertainties as the effects will depend on there being capacity at those schools and colleges to accommodate new pupils.
	 Housing sites that are within 0-15 minutes journey time (via non-car based modes of transport) of a primary school AND within 0-20 minutes of a secondary school are likely to have a significant positive (++?) effect. In addition, if a site is within 0-30 minutes of a further education facility this would also contribute to the significant positive effect.
	Housing sites that are within 0-15 minutes journey time (via non-car based modes of transport) of a primary school OR

SA Objectives	SA Assumptions
	within 0-20 minutes of a secondary school are likely to have a minor positive (+?) effect.
	 Housing sites that are within 15-30 minutes of a primary school AND within 20-40 minutes of a secondary school are likely to have a negligible (0?) effect.
	 Housing sites that are more than 30 minutes from a primary school OR more than 40 minutes from a secondary school are likely to have a minor negative (-?) effect.
	 Housing sites that are more than 30 minutes from a primary school AND more than 40 minutes from a secondary school are likely to have a significant negative (?) effect.
4. Improve the health of local people and ensure that they can access the health and social care they need.	The location of housing sites will not affect the number or location of healthcare facilities; however where healthcare facilities are easily accessible from housing sites there will be positive effects on residents' health.
	 Housing sites that are within 0-15 minutes journey time (via non-car based modes of transport) of a GP AND within 0- 30 minutes of a hospital are likely to have a significant positive (++) effect.
	 Housing sites that are within 0-15 minutes journey time (via non-car based modes of transport) of a GP OR within 0-30 minutes of a hospital are likely to have a minor positive (+) effect.
	 Housing sites that are within 15-30 minutes of a GP AND within 30-60 minutes of a hospital are likely to have a negligible (0) effect.
	 Housing sites that are more than 30 minutes from a GP OR more than 60 minutes from a hospital are likely to have a minor negative (-) effect.
	 Housing sites that are more than 30 minutes from a GP AND more than 60 minutes from a hospital are likely to have a significant negative () effect.
	Housing sites within or adjacent to either of the two Air Quality Management Areas that have been declared in Kirklees could negatively affect the health of residents as result of exposure to poor air quality. Therefore, in addition to the above (which may result in mixed effects overall where a site is within or adjacent to an AQMA):
	Sites that are within or adjacent to an AQMA would have a minor negative effect (-).
	Where a site is not within or adjacent to an AQMA, no score is given for this part of the SA objective and the score is based only on the accessibility of healthcare facilities.
5. Protect local amenity including avoiding noise and light pollution.	Where new residential development is proposed within close proximity of sensitive receptors (e.g. existing houses, schools, hospitals etc.) there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase. New residential development within close proximity of major roads or railways or industrial areas (as

SA Objectives	SA Assumptions
	indicated on the basemap ⁵⁷) may result in noise pollution affecting residents in the longer term.
	 Sites that are surrounded by existing residential development or other sensitive receptors may have a significant negative () effect during the construction phase, and sites that are directly adjacent to an 'A' road, motorway or railway line, or industrial area would have a significant negative () effect in the longer-term.
	 Sites that are not surrounded by existing residential development or other sensitive receptors but which have such receptors within 100m may have a minor negative (-) effect during the construction phase.
	 Sites that are not within 100m of existing residential development or other sensitive receptors would have a negligible (0) effect during the construction phase.
6. Retain and enhance access to local services and facilities.	The <u>location</u> of housing sites will not directly affect the number or range of services in a particular location (although a large scale housing development could potentially stimulate the provision of new services); however the location of housing sites could affect this objective by influencing people's ability to access existing services and facilities.
	 Housing sites that are within 0-5 minutes journey time (via non-car based modes of transport) of a local centre AND within 0-15 minutes of a town/District centre are likely to have a significant positive (++) effect.
	 Housing sites that are within 0-5 minutes journey time (via non-car based modes of transport) of a local centre OR within 0-15 minutes of a town/District centre are likely to have a minor positive (+) effect.
	 Housing sites that are within 5-15 minutes of a local centre AND within 30 minutes of a town/District centre are likely to have a negligible (0) effect.
	 Housing sites that are within 5-15 minutes of a local centre OR within 30 minutes of a town/District centre are likely to have a minor negative (-) effect.
	Housing sites that are more than 15 minutes from a local centre AND more than 30 minutes from a town/District centre are likely to have a significant negative () effect.
7. Make our communities safer by reducing crime, anti-social behaviour and	The effects of new housing developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within the housing sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the <u>location</u> of housing

⁵⁷ It is recognised that this will be an indication only as there may be uncertainty relating to the nature of the industrial activities taking place within an industrial area indicated on a basemap, or for example, areas shown as Mills within the District may no longer be operational.

SA Objectives	SA Assumptions
the fear of crime.	sites (rather they will be determined through the detailed proposals for each site) and so the effects of all of the potential residential sites on this SA objective will be negligible (0).
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	The effects of potential housing sites on this SA objective will depend in part on the provision of open space, green infrastructure or sports facilities within the new development, which is unknown at this stage. However, proximity to existing recreational facilities and areas of open space will also influence effects, particularly if facilities and open space are within walking distance (600m).
	 Sites that are within 600m of three or more areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways are likely to have a significant positive (++) effect.
	 Sites that are within 600m of one or two areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways are likely to have a minor positive (+) effect.
	 Sites that are more than 600m from any areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways are likely to have a minor negative (-) effect.
	In addition, which may result in mixed effects overall:
	• Sites that include any of the following: existing open space, recreation facilities, Public Rights of Way are likely to have a significant negative effect, although this effect would be uncertain (?), as it cannot be known whether the recreation asset would be lost due to the development.
9. Ensure all people are able to live in a decent home which meets their needs.	All of the potential residential sites are expected to have positive effects on this objective, due to the nature of the proposed development and it is assumed that housing developments will include an appropriate proportion of affordable housing. Larger sites will provide opportunities for developing greater numbers of new homes, and therefore are assumed to have a significant positive effect. Based on the range of sizes of the potential sites for residential development being considered by Kirklees Council, larger sites are taken to be those over 5ha.
	 Large sites (over 5ha) will have a significant positive (++) effect.
	Smaller sites (up to 5ha) will have a minor positive (+) effect.
10. Secure an effective and safe transport network which encourages people to make use of	How well connected housing sites are to services, facilities and employment opportunities by sustainable modes of transport will affect the extent to which residents are able to make use of non car-based modes of transport day to day. It is possible that new transport links such as bus routes or cycle paths may be provided as part of large-scale housing developments but

SA Objectives	SA Assumptions
sustainable and active modes of transport.	this cannot be assumed.
	The heat mapping work that has been carried out for Kirklees Council assessed the accessibility of eight different features ⁵⁸ from each site option on the basis of sustainable modes of transport, and maps the sites on a scale of green to red. Sites are mapped as green (and therefore considered as having good access) for the feature in question when they are within the journey time standards set out by the Department for Transport ⁵⁹ , which vary for each of the eight features.
	 Sites that are mapped as green for at least four of the eight features are likely to have a significant positive (++) effect.
	• Sites that are mapped as green for between one and three of the eight features are likely to have a minor positive (+) effect.
	• Sites that are mapped as green for none of the eight features are likely to have a significant negative () effect.
11. Secure the efficient and prudent use of land.	Where development takes place on greenfield land or areas of high quality agricultural land it is a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land. There is no Grade 1 agricultural land in Kirklees; however there are areas of Grade 2 and 3.
	• Large sites (over 5ha) entirely or mainly on greenfield land are likely to have a significant negative () effect.
	• Small sites (less than 5ha) entirely or mainly on greenfield land are likely to have a minor negative (-) effect.
	• Small sites (less than 5ha) entirely or mainly on brownfield land are likely to have a minor positive (+) effect.
	• Large sites (over 5ha) entirely or mainly on brownfield land are likely to have a significant positive (++) effect.
	In addition, which may lead to mixed effects with the above:
	 Sites that are mainly or entirely on greenfield land which is classed as being of Grade 2 or 3 agricultural quality would have a minor negative (-) effect.
	Where a site is entirely or mainly on brownfield land the grade of the agricultural land does not affect the SA score, which is based entirely on the size of the site and whether the land has been previously developed or not.
12. Protect and enhance the character of Kirklees and the quality of the	A small area in the south of Kirklees lies within the Peak District National Park. Development within that part of the District could have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known.

The eight features considered are: primary schools, secondary schools, further education, GPs, hospitals, employment nodes, local centres and town/districtDistrict centres. Squidance on DfT Accessibility Standards: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/372139/accessibility-statistics-guidance.pdf

SA Objectives	SA Assumptions
landscape and townscape.	Sites that are within 500m of the National Park could have a significant negative effect (?) on the landscape.
	Outside of designated landscape areas, where development will take place on greenfield land, the character of the local environment is more likely to be affected and larger sites are more likely to have a more prominent impact than smaller sites. However, effects are uncertain depending on the design of new development and the quality of the landscape. Where a brownfield site is redeveloped it is likely that the overall character and appearance of the site will be improved as a result of new development, which is assumed to be of high quality, and this may benefit the appearance of the landscape/townscape. However, this is uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously.
	 Large sites (over 5ha) entirely or mainly on greenfield land may have a significant negative (?) effect on this objective.
	 Small sites (less than 5ha) entirely or mainly on greenfield land may have a minor negative (-?) effect on this objective.
	 Sites of any size on brownfield land could have a minor positive (+?) effect on this objective.
	Information from the emerging Kirklees Landscape Character Assessment will also be taken into account as appropriate.
13. Conserve and enhance the historic environment, heritage assets and their settings.	Historic England (formerly English Heritage) has been consulted on the list of residential site options being considered for allocation in the Kirklees Local Plan and has rated each site as either red, orange, yellow or green based on the likely effects on the historic environment of developing the site in question:
	Red - The development of the site is likely to result in substantial harm to a designated heritage asset.
	Orange - The impact of the development of these sites on the historic environment is uncertain.
	Yellow- The allocation of this site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment.
	Green - The development of the site is unlikely to result in harm to any designated heritage asset.

SA Objectives	SA Assumptions
	Sites that are rated red by Historic England could have a significant negative (?) effect.
	Sites that are rated yellow by Historic England could have a minor negative (-?) effect.
	Sites that are rated green by Historic England could have a negligible (0?) effect.
	Sites that are rated orange by Historic England would have an (?) uncertain effect.
	In all cases, potential effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	Housing sites that are within proximity of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, trampling etc. Conversely, there may be opportunities to promote habitat connectivity if housing developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists as the distance at which effects might occur is not the same for all types of habitats and species, and appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition to potential effects on nearby designated sites, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment (as site surveys are not undertaken). This would need to be determined once more specific proposals are developed and submitted as part of a planning application. Distances of 250m and 1km have been used as an indication of proximity, as there are no standard distance thresholds available and it is recognised that the distance over which effects may occur vary between habitats and species and the types of effect being considered. This level of detail is not possible to be determined as part of the SA, but the findings of the Habitats Regulations Assessment (HRA) will be taken into account during the next stage of the Local Plan preparation. • Sites that are within 250m of one or more designated biodiversity or geodiversity sites may have a significant negative (?) effect. • Sites that are between 250m and 1km of one or more designated sites biodiversity or geodiversity sites may have a negligible (0?) effect.
15. Reduce air, water and soil pollution.	The specific location of housing developments would not have a direct effect on levels of soil or water pollution, which would be influenced by factors such as whether there is capacity at the District's sewage treatment works to treat the additional wastewater generated by the overall scale of development proposed.
	Development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution

SA Objectives	SA Assumptions
	 as increased vehicle traffic from population growth in those areas could compound existing air quality problems. Sites that are within or directly adjacent to an AQMA are likely to have a significant negative () effect. Sites that are not within an AQMA will have a negligible (0) effect.
16. Prevent inappropriate new development in flood risk areas and ensure development does not	The development of new housing on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. National Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of flood zone 1 and 2 but would require an exception test in flood zone 3a, and is unsuitable in flood zone 3b.
contribute to increased flood risk for existing property and people.	While new development in any location may offer good opportunities to incorporate SuDS, and therefore have a positive effect on reducing flood risk, this would depend on the design of the proposed development and not on the location of the site.
property and people.	 Sites that are entirely or mainly on greenfield land that is within flood zones 3a and 3b are likely to have a significant negative () effect.
	 Sites that are either entirely or mainly on greenfield outside of flood zones 3a and 3b, or that are entirely or mainly on brownfield within flood zones 3a and 3b are likely to have a minor negative (-) effect.
	Sites that are on brownfield land outside of flood zones 3a and 3b are likely to have a negligible (0) effect.
17. Increase prevention, re-use, recovery and recycling of waste close to source.	All new housing development is likely to involve an increase in waste generation, but may also offer good opportunities for incorporating sustainable waste management practices (e.g. through sustainable construction practices but also design of new developments to incorporate space for storage and collection of recyclables), regardless of the <u>location</u> of the potential residential sites. Kirklees has District-wide kerbside recycling; therefore proximity to household recycling centres is not a key indicator of the effects of development on recycling rates.
	Where housing development is proposed on brownfield land, there may be good opportunities for using existing buildings and materials although this is uncertain depending on the previous use of the site.
	 Sites on greenfield land are likely to have a minor negative (-) effect on this objective.
	 Sites on brownfield land may have a minor positive (+?) effect on this objective.

SA Objectives	SA Assumptions
18. Increase efficiency in water, energy and raw material use.	While all new residential development is likely to involve an increase in energy and water consumption this will not be influenced by the <u>location</u> of residential sites. In addition, new development may offer good opportunities for incorporating renewable energy generation and water efficiency measures and it is assumed that new houses will be built to high standards of efficiency.
	Similarly, all housing development will result in the increased consumption of minerals for construction but this will not be influenced by the location of residential sites. The location of development sites can influence the efficient use of minerals by the proximity of the development to Minerals Safeguarding Areas as development in those areas may sterilise mineral resources and restrict the availability of resources in the District. However, because of the extent of minerals resources within Kirklees, all sites would have the same effect. In addition, not all of the resources would necessarily be economically viable and it may be possible to achieve prior extraction to avoid sterilisation. Therefore, all sites will have a negligible (0) effect on this SA objective.
19. Reduce the contribution that the District makes to climate change.	The <u>location</u> of residential development will not affect the contribution that the buildings make to climate change, which will be influenced by other factors such as how energy efficient the building is. However, where residential sites are well-connected by sustainable transport links to employment nodes, services and facilities, levels of car use and the associated greenhouse gas emissions are likely to be lower. Therefore, as for SA objective 10 above, the scores for this objective are based on the heat mapping work that has been carried out for Kirklees Council and takes into account how well connected each site is to the eight features assessed.
	 Sites that are mapped as green for at least four of the eight features are likely to have a significant positive (++) effect.
	Sites that are mapped as green for between one and three of the eight features are likely to have a minor positive (+) effect.
	Sites that are mapped as green for none of the eight features are likely to have a significant negative () effect.

Table A4.2: Assumptions for SA of employment site options

SA Objectives	SA Assumptions
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	The provision of new employment sites in any location is likely to have a positive effect on this objective by ensuring that new job opportunities are provided to match the population growth that is being planned for within the Local Plan. Effects will be particularly positive where sites are large in size as they will result in more job creation. • Large sites (over 5ha) are likely to have a significant positive (++) effect.
	 Small sites (up to 5ha) are likely to have a minor positive (+) effect. Issues to do with the relative accessibility of the employment sites are considered under SA objectives 10 and 19.
Achieve an economy better capable of growth	The provision of new employment sites in any location is likely to have a positive effect on this objective by encouraging economic growth. Effects will be particularly positive where sites are large in size.
through increasing investment, innovation and Entrepreneurship.	 Large sites (over 5ha) are likely to have a significant positive (++) effect. Small sites (up to 5ha) are likely to have a minor positive (+) effect.
3. Ensure education facilities are available to all.	The location of employment sites will not have a direct effect on this SA objective; therefore all sites will have a negligible (0) effect.
4. Improve the health of local people and ensure that they can access the health and social care they need.	The location of employment sites will not have a direct effect on this SA objective; therefore all sites will have a negligible (0) effect.
5. Protect local amenity including avoiding noise and light pollution.	Where employment development is proposed within close proximity of sensitive receptors there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase but also potentially during the operational phase depending on the nature of businesses that locate at the site.
	 Sites that are surrounded by existing residential development or other sensitive receptors may have a significant negative effect although this is uncertain (?).
	 Sites that are not surrounded by existing residential development or other sensitive receptors but which have such receptors within 100m may have a minor negative effect although this is uncertain (-?).
	Sites that are not within 100m of residential development or other sensitive receptors would have a negligible (0)

SA Objectives	SA Assumptions
	effect.
6. Retain and enhance access to local services and facilities.	The location of employment sites is not expected to have a significant effect on this objective, with effects being determined more by the location of residential sites (which have been appraised separately). Therefore, all of the employment site options are considered likely to have a negligible (0) effect on retaining and enhancing access to local services and facilities.
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	It is possible that the provision of new job opportunities resulting from the allocation of new employment sites could help to improve overall levels of prosperity in the District; therefore reducing the levels of crime, although this is an indirect effect and cannot be assumed. The effects of new employment developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within the employment sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night when employment sites are likely to be quiet. However, such issues will not be influenced by the location of employment sites (rather they will be determined through the detailed proposals for each site) and so the effects of all of the potential employment sites on this SA objective will be negligible (0).
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	The effects of the potential employment sites on this SA objective will partly depend on the proximity of open space and green infrastructure which can be used by employees during breaks, and also relate to whether any recreation facilities/areas of open space/green infrastructure would be lost due to development of the site for employment.
	 Sites that are within 600m of two or more areas of open space or playing fields/sports facilities are likely to have a minor positive (+) effect on encouraging their usage.
cheodrage their usage.	 Sites that are within 600m of fewer than two areas of open space or playing fields/sports facilities are likely to have a minor negative (-) effect on encouraging their usage.
	In addition, which may result in mixed effects overall:
	• Sites that include any of the following: existing open space, recreation facilities, Public Rights of Way are likely to have a significant negative () effect. However, this effect would be uncertain (?), as it cannot be known whether the recreation asset would be lost due to the development.
9. Ensure all people are able to live in a decent home which meets their needs.	The location of employment sites is not considered likely to affect this objective; therefore the score for all sites will be negligible (0).
10. Secure an effective and safe transport	Accessibility 'heatmapping' work that has been undertaken on behalf of Kirklees Council has been analysed by the Council to identify the number of working age people (those aged 16-64) that live within 20 minutes travel time of each employment site

SA Objectives	SA Assumptions
network which encourages people to make use of sustainable and active modes of transport.	option, taking into account non-car based modes of transport. The potential employment sites have all been shown to have a number of working age people living within 20 minutes travel time using non-car based modes of transport, however, the number of working age people within 20 minutes ranges from between 941 to 54,845.
	Where more working age people are able to access employment sites via sustainable transport it is assumed to be more likely that people will use non-car based modes of transport to commute.
	 Sites that could be accessed via sustainable transport within 20 minutes by more than 25,000 people are likely to have a significant positive (++) effect.
	• Sites that could be accessed via sustainable transport within 20 minutes by between 5,000 and 25,000 people are likely to have a minor positive (+) effect.
	Sites that could be accessed via sustainable transport within 20 minutes by fewer than 5,000 people are likely to have a negligible (0) effect.
11. Secure the efficient and prudent use of land.	Where development takes place on greenfield land or areas of high quality agricultural land it is a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land.
	• Large sites (over 5ha) entirely or mainly on greenfield land are likely to have a significant negative () effect.
	Small sites (less than 5ha) entirely or mainly on greenfield land are likely to have a minor negative (-) effect.
	Small sites (less than 5ha) entirely or mainly on brownfield land are likely to have a minor positive (+) effect.
	• Large sites (over 5ha) entirely or mainly on brownfield land are likely to have a significant positive (++) effect.
	In addition, which may lead to mixed effects with the above:
	 Sites that are mainly or entirely on greenfield land which is classed as being of Grade 1 agricultural quality would have a significant negative () effect.
	 Sites that are mainly or entirely on greenfield land which is classed as being of Grade 2 or 3 agricultural quality would have a minor negative (-) effect.
12. Protect and enhance the character of Kirklees and the quality of the	A small area in the south of Kirklees lies within the Peak District National Park. Development within that part of the District could have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known.
landscape and townscape.	Sites that are within 500m of the National Park could have a significant negative effect (?) on the landscape.
	Outside of designated landscape areas, where development will take place on greenfield land, the character of the local environment is more likely to be affected and larger sites are more likely to have a more prominent impact than smaller sites.

SA Objectives	SA Assumptions
	However, effects are uncertain depending on the design of new development and the quality of the landscape. Where a brownfield site is redeveloped it is likely that the overall character and appearance of the site will be improved as a result of new development, which is assumed to be of high quality, and this may benefit the appearance of the landscape/townscape. However, this is uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously.
	 Large sites (over 5ha) entirely or mainly on greenfield land may have a significant negative (?) effect on this objective.
	• Small sites (less than 5ha) entirely or mainly on greenfield land may have a minor negative (-?) effect on this objective.
	 Sites of any size on brownfield land could have a minor positive (+?) effect on this objective.
	Information from the emerging Kirklees Landscape Character Assessment will also be taken into account as appropriate.
13. Conserve and enhance the historic environment, heritage	Historic England (formerly English Heritage) has been consulted on the list of employment site options being considered for allocation in the Kirklees Local Plan and has rated each site as either red, orange, yellow or green based on the likely effects on the historic environment of developing the site in question:
assets and their settings.	Red - The development of the site is likely to result in substantial harm to a designated heritage asset.
	Orange - The impact of the development of these sites on the historic environment is uncertain.
	Yellow- The allocation of this site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment.
	Green - The development of the site is unlikely to result in harm to any designated heritage asset.
	Sites that are rated red by Historic England could have a significant negative (?) effect.
	Sites that are rated yellow by Historic England could have a minor negative (-?) effect.
	Sites that are rated green by Historic England could have a negligible (0?) effect.
	Sites that are rated orange by Historic England would have an (?) uncertain effect.
	In all cases, potential effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).
14. Maximise opportunities to protect	Employment sites that are within 250m of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution,

SA Objectives	SA Assumptions
and enhance biodiversity and geodiversity.	trampling etc. Conversely, there may be opportunities to promote habitat connectivity if housing developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.
	 Sites that are within 250m of one or more designated biodiversity or geodiversity sites may have a significant negative (?) effect.
	 Sites that are between 250m and 1km of one or more designated sites biodiversity or geodiversity sites may have a minor negative (-?) effect.
	Sites that are more than 1km from any designated biodiversity or geodiversity sites may have a negligible (0?) effect.
15. Reduce air, water and soil pollution.	The specific location of employment developments would not have a direct effect on levels of soil or water pollution, which would be influenced by factors such as whether there is capacity at the District's sewage treatment works to treat the additional wastewater generated by the overall scale of development proposed.
	Development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic associated with employment development in those areas could compound existing air quality problems, particularly if the businesses located there involve significant numbers of vehicle movements.
	Sites that are within or directly adjacent to an AQMA are likely to have a significant negative () effect.
	Sites that are not within an AQMA will have a negligible (0) effect.
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	While it is recognised that new development in any location may offer good opportunities to incorporate SuDS, employment development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. National Planning Practice Guidance identifies offices and general industry as a 'less vulnerable use', which is suitable in areas of flood zone 1, 2 and 3a but is unsuitable in flood zone 3b.
	 Sites that are entirely or mainly on greenfield land that is within flood zone 3b are likely to have a significant negative () effect.
	 Sites that are either entirely or mainly on greenfield outside of flood zone 3b, or that are entirely or mainly on brownfield within flood zone 3b are likely to have a minor negative (-) effect.
	 Sites that are on brownfield land outside of flood zone 3b are likely to have a negligible (0) effect.
17. Increase prevention,	All new employment development will inevitably involve an increase in waste generation, but may also offer good opportunities

SA Objectives	SA Assumptions
re-use, recovery and recycling of waste close to source.	for incorporating sustainable waste management practices, regardless of the location. Where development is proposed on brownfield land, there may be good opportunities for using existing buildings and materials although this is uncertain depending on the previous use of the site. • Sites on greenfield land are likely to have a minor negative (-) effect on this objective. • Sites on brownfield land may have a minor positive (+?) effect on this objective.
18. Increase efficiency in water, energy and raw material use.	While all new employment development is likely to involve an increase in energy and water consumption this will not be influenced by the <u>location</u> of employment sites. In addition, new development may offer good opportunities for incorporating renewable energy generation and water efficiency measures and it is assumed that new development will be built to high standards of efficiency.
	Similarly, all employment development will result in the increased consumption of minerals for construction but this will not be influenced by the location of employment sites. The location of development sites can influence the efficient use of minerals by the proximity of the development to Minerals Safeguarding Areas as development in those areas may sterilise mineral resources and restrict the availability of resources in the District. However, because of the extent of minerals resources within Kirklees, all sites would have the same effect. In addition, not all of the resources would necessarily be economically viable and it may be possible to achieve prior extraction to avoid sterilisation. Therefore, all sites will have a negligible (0) effect on this SA objective.
19. Reduce the contribution that the District makes to climate change.	The <u>location</u> of employment development will not affect the contribution that the buildings make to climate change, which will be influenced by other factors such as how energy efficient the building is and the nature of commercial activities at the site. However, where employment sites are well-connected by sustainable transport links to residential areas, levels of car use and the associated greenhouse gas emissions are likely to be lower. Therefore, as for SA objective 10 above, the scores for this objective are based on the Council's analysis of the heat mapping work that has been carried out for Kirklees Council and takes into account how many working age people would be able to access the site within 20 minutes via sustainable modes of transport. • Sites that could be accessed via sustainable transport within 20 minutes by more than 25,000 people are likely to have
	 a significant positive (++) effect. Sites that could be accessed via sustainable transport within 20 minutes by between 5,000 and 25,000 people are likely to have a minor positive (+) effect.
	Sites that could be accessed via sustainable transport within 20 minutes by fewer than 5,000 people are likely to have a negligible (0) effect.

Table A4.3: Assumptions for SA of mixed-use site options

SA Objectives	SA Assumptions
1: Increase the number and range of employment opportunities available for local people, and	The provision of new employment development within a mixed use site in any location is likely to have a positive effect on this objective by ensuring that new job opportunities are provided to match the population growth that is being planned for within the Local Plan. Co-locating employment and residential development as part of a mixed use site will have particularly positive effects as this approach will help to ensure that job opportunities are easily accessible.
ensure that they are accessible.	 Mixed use sites that incorporate both employment and residential development are likely to have a significant positive (++) effect.
doossisio	 Mixed use sites that incorporate employment development but not residential development are likely to have a minor positive (+) effect.
	Mixed use sites that do not incorporate employment development would have a negligible (0) effect.
2. Achieve an economy better capable of	The provision of new employment development within a mixed use site in any location is likely to have a positive effect on this objective by encouraging economic growth.
growth through increasing investment,	 Mixed use sites that incorporate employment provision are likely to have a minor positive (+) effect.
innovation and Entrepreneurship.	 Mixed use sites that do not incorporate employment provision are likely to have a negligible (0) effect.
3. Ensure education facilities are available to all.	The effects of mixed use development (where it incorporates housing) on this objective will depend to some extent on the availability of school and college places to serve the growing population - this will depend in part on whether new places are provided as part of the new development, which is unknown at this stage.
	Effects will also depend on how accessible existing schools and colleges are from site options, although there are uncertainties as the effects will depend on there being capacity at those schools and colleges to accommodate new pupils.
	 Mixed use sites (incorporating housing) that are within 0-15 minutes journey time (via non-car based modes of transport) of a primary school AND within 0-20 minutes of a secondary school are likely to have a significant positive (++?) effect. In addition, if a site is within 0-30 minutes of a further education facility this would also contribute to the significant positive effect.
	 Mixed use sites (incorporating housing) that are within 0-15 minutes journey time (via non-car based modes of transport) of a primary school OR within 0-20 minutes of a secondary school are likely to have a minor positive (+?) effect.
	Mixed use sites (incorporating housing) that are within 15-30 minutes of a primary school AND within 20-40 minutes of

SA Objectives	SA Assumptions
	a secondary school are likely to have a negligible (0?) effect.
	 Mixed use sites (incorporating housing) that are more than 30 minutes from a primary school OR more than 40 minutes from a secondary school are likely to have a minor negative (-?) effect.
	 Mixed use sites (incorporating housing) that are more than 30 minutes from a primary school AND more than 40 minutes from a secondary school are likely to have a significant negative (?) effect.
	Mixed use sites that do not incorporate residential development will have a negligible (0) effect on this SA objective.
4. Improve the health of local people and ensure that they can	The location of mixed use sites (where it incorporate housing) will not affect the number or location of healthcare facilities; however where healthcare facilities are easily accessible from residential development there will be positive effects on residents' health.
access the health and social care they need.	 Mixed use sites (incorporating housing) that are within 0-15 minutes journey time (via non-car based modes of transport) of a GP AND within 0-30 minutes of a hospital are likely to have a significant positive (++) effect.
	 Mixed use sites (incorporating housing) that are within 0-15 minutes journey time (via non-car based modes of transport) of a GP OR within 0-30 minutes of a hospital are likely to have a minor positive (+) effect.
	 Mixed use sites (incorporating housing) that are within 15-30 minutes of a GP AND within 30-60 minutes of a hospital are likely to have a negligible (0) effect.
	 Mixed use sites (incorporating housing) that are more than 30 minutes from a GP OR more than 60 minutes from a hospital are likely to have a minor negative (-) effect.
	 Mixed use sites (incorporating housing) that are more than 30 minutes from a GP AND more than 60 minutes from a hospital are likely to have a significant negative () effect.
	Sites that are within or adjacent to either of the two Air Quality Management Areas that have been declared in Kirklees could negatively affect the health of residents and employees at the site as result of exposure to poor air quality. Therefore, in addition to the above (which may result in mixed effects overall where a site is within or adjacent to an AQMA):
	 Sites that are within or adjacent to an AQMA would have a minor negative effect (-).
	Where a site is not within or adjacent to an AQMA, no score is given for this part of the SA objective and the score is based only on the accessibility of healthcare facilities.
	Mixed use sites that do not incorporate residential development will have a negligible (0) effect on this SA objective (unless they are within or adjacent to an AQMA).
5. Protect local amenity	Where new development is proposed within close proximity of sensitive receptors (e.g. existing houses, schools, hospitals etc.)

SA Objectives	SA Assumptions
including avoiding noise and light pollution.	there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase. Mixed use development (incorporating residential development) within close proximity of major roads or railways or industrial areas (as indicated on the basemap ⁶⁰) may result in noise pollution affecting residents in the longer term.
	 Mixed use sites that are surrounded by existing residential development or other sensitive receptors may have a significant negative () effect during the construction phase, and sites that incorporate residential development and are directly adjacent to an 'A' road, motorway or railway line, or industrial area would have a significant negative () effect in the longer-term.
	 Mixed use sites that are not surrounded by existing residential development or other sensitive receptors but which have such receptors within 100m may have a minor negative (-) effect during the construction phase.
	 Mixed use sites that are not within 100m of existing residential development or other sensitive receptors would have a negligible (0) effect during the construction phase.
6. Retain and enhance	Where mixed use sites would result in the provision of new services and facilities, a significant positive (++) effect is likely.
access to local services and facilities.	Where new services and facilities are not proposed as part of a mixed use development site option, and where the development will incorporate residential provision, the location of the site could affect this objective by influencing people's ability to access existing services and facilities.
	 Mixed use sites (incorporating residential development) that are within 0-5 minutes journey time (via non-car based modes of transport) of a local centre AND within 0-15 minutes of a town/District centre are likely to have a significant positive (++) effect.
	 Mixed use sites (incorporating residential development) that are within 0-5 minutes journey time (via non-car based modes of transport) of a local centre OR within 0-15 minutes of a town/District centre are likely to have a minor positive (+) effect.
	 Mixed use sites (incorporating residential development) that are within 5-15 minutes of a local centre AND within 30 minutes of a town/District centre are likely to have a negligible (0) effect.
	 Mixed use sites (incorporating residential development) that are within 5-15 minutes of a local centre OR within 30 minutes of a town/District centre are likely to have a minor negative (-) effect.
	 Mixed use sites (incorporating residential development) that are more than 15 minutes from a local centre AND more than 30 minutes from a town/District centre are likely to have a significant negative () effect.

⁶⁰ It is recognised that this will be an indication only as there may be uncertainty relating to the nature of the industrial activities taking place within an industrial area indicated on a basemap, or for example, areas shown as Mills within the District may no longer be operational.

SA Objectives	SA Assumptions
	Where mixed use sites do not incorporate residential development or new services and facilities, a negligible (0) effect is likely.
7. Make our communities safer by reducing crime, antisocial behaviour and the fear of crime.	The effects of new mixed use developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the <u>location</u> of development (rather they will be determined through the detailed proposals for each site) and so the effects of all of the potential mixed use sites on this SA objective will be negligible (0).
8. Protect and enhance existing and support the provision of new	Where mixed use sites would result in the provision of new open space or sports/recreation facilities, a significant positive (++) effect is likely.
recreation facilities and areas of open space and encourage their usage.	Where new recreation facilities or open space are not proposed as part of a mixed use development site option, and where the development will incorporate residential provision, the proximity of the site to existing recreational facilities and areas of open space will influence effects, particularly if facilities and open space are within walking distance (600m).
	 Mixed use sites (incorporating residential development) that are within 600m of three or more areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways are likely to have a significant positive (++) effect.
	Mixed use sites (incorporating residential development) that are within 600m of one or two areas of open space, playing

SA Objectives	SA Assumptions
	fields/sports facilities, cycle paths, footpaths or bridleways are likely to have a minor positive (+) effect.
	 Mixed use sites (incorporating residential development) that are more than 600m from any areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways are likely to have a minor negative (-) effect.
	Where a site option would not involve the provision of new open space or residential development, but would involve employment development:
	 Sites that are within 600m of two or more areas of open space or playing fields/sports facilities are likely to have a minor positive (+) effect on encouraging their usage.
	 Sites that are within 600m of fewer than two areas of open space or playing fields/sports facilities are likely to have a minor negative (-) effect on encouraging their usage.
	In addition, which may result in mixed effects overall:
	• Sites that include any of the following: existing open space, recreation facilities, Public Rights of Way are likely to have a significant negative effect, although this effect would be uncertain (?), as it cannot be known whether the recreation asset would be lost due to the mixed use development.
9. Ensure all people are able to live in a decent home which meets their needs.	All of the potential mixed use sites that would incorporate residential development are expected to have positive effects on this objective, due to the nature of the development proposed, and it is assumed that developments will include an appropriate proportion of affordable housing. Larger sites will provide opportunities for developing greater numbers of new homes, and therefore are assumed to have a significant positive effect, although this is uncertain depending on how much of the mixed use development is residential as opposed to employment development. Based on the range of sizes of the potential sites for mixed use development being considered by Kirklees Council, larger sites are taken to be those over 5ha.
	 Large sites (over 5ha) could have a significant positive (++?) effect.
	Smaller sites (up to 5ha) could have a minor positive (+?) effect.
10. Secure an effective and safe transport network which encourages people to	How well connected mixed use sites (those that incorporate residential development) are to services, facilities and employment opportunities by sustainable modes of transport will affect the extent to which residents within the site are able to make use of non car-based modes of transport day to day. It is possible that new transport links such as bus routes or cycle paths may be provided as part of large-scale developments but this cannot be assumed.
make use of sustainable and active	The heat mapping work that has been carried out for Kirklees Council assessed the accessibility of eight different features ⁶¹ from each site option on the basis of sustainable modes of transport, and maps the sites on a scale of green to red. Sites are

⁶¹ The eight features considered are: primary schools, secondary schools, further education, GPs, hospitals, employment nodes, local centres and town/districtDistrict centres.

SA Objectives	SA Assumptions
modes of transport.	mapped as green (and therefore considered as having good access) for the feature in question when they are within the journey time standards set out by the Department for Transport ⁶² , which vary for each of the eight features.
	For sites that incorporate employment provision, the extent to which people are able to access the site via sustainable modes of transport will influence how likely they are to commute by means other than cars. This has also been considered through heatmapping work carried out by the Council.
	Therefore, for sites that incorporate residential development:
	Sites that are mapped as green for at least four of the eight features are likely to have a significant positive (++) effect.
	 Sites that are mapped as green for between one and three of the eight features are likely to have a minor positive (+) effect.
	Sites that are mapped as green for none of the eight features are likely to have a significant negative () effect.
	In addition, which may lead to mixed effects with the above, where sites incorporate employment development:
	 Sites that could be accessed via sustainable transport within 20 minutes by more than 25,000 people are likely to have a significant positive (++) effect.
	 Sites that could be accessed via sustainable transport within 20 minutes by between 5,000 and 25,000 people are likely to have a minor positive (+) effect.
	• Sites that could be accessed via sustainable transport within 20 minutes by fewer than 5,000 people are likely to have a negligible (0) effect.
11. Secure the efficient and prudent use of	Where development takes place on greenfield land or areas of high quality agricultural land it is a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land.
land.	• Large sites (over 5ha) entirely or mainly on greenfield land are likely to have a significant negative () effect.
	Small sites (less than 5ha) entirely or mainly on greenfield land are likely to have a minor negative (-) effect.
	Small sites (less than 5ha) entirely or mainly on brownfield land are likely to have a minor positive (+) effect.
	• Large sites (over 5ha) entirely or mainly on brownfield land are likely to have a significant positive (++) effect.
	In addition, which may lead to mixed effects with the above:
	Sites that are mainly or entirely on greenfield land which is classed as being of Grade 1 agricultural quality would have a

 $^{^{62}\} Guidance\ on\ DfT\ Accessibility\ Standards:\ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/372139/accessibility-statistics-guidance.pdf$

SA Objectives	SA Assumptions
	significant negative () effect.
	 Sites that are mainly or entirely on greenfield land which is classed as being of Grade 2 or 3 agricultural quality would have a minor negative (-) effect.
	Where a site is entirely or mainly on brownfield land the grade of the agricultural land does not affect the SA score, which is based entirely on the size of the site and whether the land has been previously developed or not.
12. Protect and enhance the character of Kirklees and the	A small area in the south of Kirklees lies within the Peak District National Park. Development within that part of the District could have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known.
quality of the landscape and	Sites that are within 500m of the National Park could have a significant negative effect (?) on the landscape.
townscape.	Outside of designated landscape areas, where development will take place on greenfield land, the character of the local environment is more likely to be affected and larger sites are more likely to have a more prominent impact than smaller sites. However, effects are uncertain depending on the design of new development and the quality of the landscape. Where a brownfield site is redeveloped it is likely that the overall character and appearance of the site will be improved as a result of new development, which is assumed to be of high quality, and this may benefit the appearance of the landscape/townscape. However, this is uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously.
	 Large sites (over 5ha) entirely or mainly on greenfield land may have a significant negative (?) effect on this objective.
	• Small sites (less than 5ha) entirely or mainly on greenfield land may have a minor negative (-?) effect on this objective.
	Sites of any size on brownfield land could have a minor positive (+?) effect on this objective.
	Information from the emerging Kirklees Landscape Character Assessment will also be taken into account as appropriate.
13. Conserve and enhance the historic environment, heritage assets and their	Historic England (formerly English Heritage) has been consulted on the list of mixed use site options being considered for allocation in the Kirklees Local Plan and has rated each site as either red, orange, yellow or green based on the likely effects on the historic environment of developing the site in question:
settings.	Red - The development of the site is likely to result in substantial harm to a designated heritage asset.
	Orange - The impact of the development of these sites on the historic environment is uncertain.
	Yellow- The allocation of this site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic

SA Objectives	SA Assumptions
	environment.
	Green - The development of the site is unlikely to result in harm to any designated heritage asset.
	Sites that are rated red by Historic England could have a significant negative (?) effect.
	Sites that are rated yellow by Historic England could have a minor negative (-?) effect.
	Sites that are rated green by Historic England could have a negligible (0?) effect.
	Sites that are rated orange by Historic England would have an (?) uncertain effect.
	In all cases, potential effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	Mixed use sites that are within proximity of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, trampling etc. Conversely, there may be opportunities to promote habitat connectivity if housing developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists as the distance at which effects might occur is not the same for all types of habitats and species, and appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition to potential effects on nearby designated sites, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment (as site surveys are not undertaken). This would need to be determined once more specific proposals are developed and submitted as part of a planning application. Distances of 250m and 1km have been used as an indication of proximity, as there are no standard distance thresholds available and it is recognised that the distance over which effects may occur vary between habitats and species and the types of effect being considered. This level of detail is not possible to be determined as part of the SA, but the findings of the Habitats Regulations Assessment (HRA) will be taken into account during the next stage of the Local Plan preparation.
	 Sites that are within 250m of one or more designated biodiversity or geodiversity sites may have a significant negative (?) effect.
	 Sites that are between 250m and 1km of one or more designated sites biodiversity or geodiversity sites may have a minor negative (-?) effect.
	Sites that are more than 1km from any designated biodiversity or geodiversity sites may have a negligible (0?) effect.
15. Reduce air, water	The specific location of mixed use developments would not have a direct effect on levels of soil or water pollution, which would be influenced by factors such as whether there is capacity at the District's sewage treatment works to treat the additional

SA Objectives	SA Assumptions
and soil pollution.	wastewater generated by the overall scale of development proposed.
	Development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic from population growth and increased economic activity in those areas could compound existing air quality problems.
	Sites that are within or directly adjacent to an AQMA are likely to have a significant negative () effect.
	Sites that are not within an AQMA will have a negligible (0) effect.
16. Prevent inappropriate new development in flood risk areas and ensure	Mixed use development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. While new development in any location may offer good opportunities to incorporate SuDS, and therefore have a positive effect on reducing flood risk, this would depend on the design of the proposed development and not on the location of the site.
development does not contribute to increased flood risk for existing property and people.	National Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of flood zone 1 and 2 but would require an exception test in flood zone 3a, and is unsuitable in flood zone 3b. Offices and general industry are identified as a 'less vulnerable use', which is suitable in areas of flood zone 1, 2 and 3a but is unsuitable in flood zone 3b.
	Therefore, for mixed use sites that incorporate residential development:
	 Sites that are entirely or mainly on greenfield land that is within flood zones 3a and 3b are likely to have a significant negative () effect.
	 Sites that are either entirely or mainly on greenfield outside of flood zones 3a and 3b, or that are entirely or mainly on brownfield within flood zones 3a and 3b are likely to have a minor negative (-) effect.
	Sites that are on brownfield land outside of flood zones 3a and 3b are likely to have a negligible (0) effect.
	For mixed use sites that do not incorporate residential development but do incorporate employment development:
	 Sites that are entirely or mainly on greenfield land that is within flood zone 3b are likely to have a significant negative () effect.
	 Sites that are either entirely or mainly on greenfield outside of flood zone 3b, or that are entirely or mainly on brownfield within flood zone 3b are likely to have a minor negative (-) effect.
	 Sites that are on brownfield land outside of flood zone 3b are likely to have a negligible (0) effect.
17. Increase prevention, re-use,	All new mixed use development is likely to involve an increase in waste generation, but may also offer good opportunities for incorporating sustainable waste management practices (e.g. through sustainable construction practices but also design of new

SA Objectives	SA Assumptions
recovery and recycling of waste close to source.	developments to incorporate space for storage and collection of recyclables), regardless of the <u>location</u> of the potential development sites. Kirklees has District-wide kerbside recycling; therefore proximity to household recycling centres is not a key indicator of the effects of development on recycling rates.
	Where mixed use development is proposed on brownfield land, there may be good opportunities for using existing buildings and materials although this is uncertain depending on the previous use of the site.
	 Sites on greenfield land are likely to have a minor negative (-) effect on this objective.
	Sites on brownfield land may have a minor positive (+?) effect on this objective.

SA Objectives	SA Assumptions
18. Increase efficiency in water, energy and raw material use.	While all new development is likely to involve an increase in energy and water consumption this will not be influenced by the <u>location</u> of mixed use sites. In addition, new development may offer good opportunities for incorporating renewable energy generation and water efficiency measures and it is assumed that new development will be built to high standards of efficiency.
	Similarly, all development will result in the increased consumption of minerals for construction but this will not be influenced by the location of mixed use sites. The location of development sites can influence the efficient use of minerals by the proximity of the development to Minerals Safeguarding Areas as development in those areas may sterilise mineral resources and restrict the availability of resources in the District. However, because of the extent of minerals resources within Kirklees, all sites would have the same effect. In addition, not all of the resources would necessarily be economically viable and it may be possible to achieve prior extraction to avoid sterilisation. Therefore, all sites will have a negligible (0) effect on this SA objective.
19. Reduce the contribution that the District makes to climate change.	The <u>location</u> of mixed use development will not affect the contribution that the buildings make to climate change, which will be influenced by other factors such as how energy efficient the building is. However, where sites that incorporate residential development are well-connected by sustainable transport links to employment nodes, services and facilities, levels of car use and the associated greenhouse gas emissions are likely to be lower. Therefore, as for SA objective 10 above, where sites incorporate residential development, the scores for this objective are based on the heat mapping work that has been carried out for Kirklees Council and takes into account how well connected each site is to the eight features assessed.
	For sites that incorporate employment provision, the extent to which people are able to access the site via sustainable modes of transport will influence how likely they are to commute by means other than cars and therefore the likely extent of transport-related greenhouse gas emissions. This has also been considered through heatmapping work carried out by the Council.
	Therefore, for sites that incorporate residential development:
	Sites that are mapped as green for at least four of the eight features are likely to have a significant positive (++) effect.
	 Sites that are mapped as green for between one and three of the eight features are likely to have a minor positive (+) effect.
	Sites that are mapped as green for none of the eight features are likely to have a significant negative () effect.
	In addition, which may lead to mixed effects with the above, where sites incorporate employment development:
	Sites that could be accessed via sustainable transport within 20 minutes by more than 25,000 people are likely to have a significant positive (++) effect.
	• Sites that could be accessed via sustainable transport within 20 minutes by between 5,000 and 25,000 people are likely to have a minor positive (+) effect.
	Sites that could be accessed via sustainable transport within 20 minutes by fewer than 5,000 people are likely to have a

SA Objectives	SA Assumptions
	negligible (0) effect.

Table A4.4: Assumptions for SA of open space site options

SA Objectives	SA Assumptions
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).
3. Ensure education facilities are available to all.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).
4. Improve the health of local people and ensure that they can access the health and social care they need.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0). The proximity of open space to residential areas, and therefore how easily people will be able to make use of sites for active outdoor recreation, is assessed under SA objective 8 below.
5. Protect local amenity including avoiding noise and light pollution.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).
6. Retain and enhance access to	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).

SA Objectives	SA Assumptions
local services and facilities.	
7. Make our communities safer by reducing crime, antisocial behaviour and the fear of crime.	The effects of new open space sites on levels of crime and fear of crime will depend on factors such as the design and the use of appropriate lighting, which could have an effect on perceptions of personal safety, particularly at night when open spaces are likely to be less well-used. However, such issues will not be influenced by the location of the open sites (rather they will be determined through the detailed proposals for each site) and so the effects of all of the potential open space sites on this SA objective will be negligible (0).
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	Open space sites that are within walking distance (600m) of residential and employment development will ensure that people have good access to areas that can be used for recreation. • Sites that are within 600m of residential or employment development will have a minor positive (+) effect. • Sites that are more than 600m from residential or employment development will have a minor negative (-) effect.
	Sites that are more than boom from residential of employment development will have a million negative () effect.
9. Ensure all people are able to live in a decent home which meets their needs.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).
11. Secure the efficient and prudent use of land.	Where sites are located on high quality (grade 1, 2 or 3) agricultural land there will be a positive effect on preserving soil quality as development (e.g. housing or employment land) will be prevented from taking place on the site, which could otherwise have led to the loss of that high value land. However, this will depend on the nature of the open space use, and whether agricultural uses are to be retained.

SA Objectives	SA Assumptions
	Sites that are on grade 1 or 2 agricultural land are likely to have a significant positive (++) effect.
	 Sites that are on grade 3 agricultural land are likely to have a minor positive (+) effect.
	 Sites that are not on grade 1, 2 or 3 agricultural land are likely to have a negligible (0) effect.
12. Protect and enhance the	New open space sites will help to enhance the character and appearance of the surrounding area; regardless of location. However, larger sites may have particularly positive effects.
character of Kirklees and the quality of the	 Sites that are large (over 3ha) will have a significant positive (++) effect.
landscape and townscape.	Sites that are small (less than 3ha) will have a minor positive (+) effect.
13. Conserve and enhance the historic environment,	Open space sites that are within close proximity of designated heritage assets could have positive effects on those assets and their settings, including by preventing other development (which could otherwise have had negative effects) from taking place. However, detailed impacts on the setting of individual historic assets cannot be determined with certainty at this strategic level of assessment.
heritage assets and their settings.	• Sites that include one or more designated heritage assets within the boundary may have a significant positive (++?) effect.
then settings.	 Sites that are within 250m of one or more designated heritage assets may have a minor positive (+?) effect on those assets and their setting.
	 Sites that are more than 250m from one or more designated heritage assets would have a negligible (0) effect on those assets and their setting.
14. Maximise opportunities to	New areas of open space are likely to have a positive effect on biodiversity by securing areas of habitat and promoting habitat connectivity. Larger sites may have particularly positive effects.
protect and enhance biodiversity and	 Sites that are large (over 3ha) will have a significant positive (++) effect.
geodiversity.	Sites that are small (less than 3ha) will have a minor positive (+) effect.
15. Reduce air, water and soil pollution.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).
16. Prevent inappropriate new development in flood	Where open space is allocated it could have a positive effect on flood risk by ensuring that there are areas of permeable surfaces which should increase infiltration and reduce the risk of surface water flooding. This will be particularly beneficial where sites are large and are within areas of higher flood risk.
risk areas and ensure development does	• Large sites (over 3ha) within high flood risk areas (flood zones 2, 3a and 3b) are likely to have a significant positive (++)

SA Objectives	SA Assumptions
not contribute to increased flood risk for existing property and people.	 effect. Small sites (less than 3ha) within high flood risk areas (flood zones 2, 3a and 3b) or large sites outside of those areas are likely to have a minor positive (+) effect. Small sites (less than 3ha) outside of high flood risk areas are likely to have a negligible (0) effect.
17. Increase prevention, re-use, recovery and recycling of waste close to source.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).
18. Increase efficiency in water, energy and raw material use.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).
19. Reduce the contribution that the District makes to climate change.	The location of areas of open space would not affect this objective; therefore the score for all sites will be negligible (0).

Table A4.5: Assumptions for SA of Traveller site options

SA Objectives	SA Assumptions
1: Increase the number and range of	While the <u>location</u> of Traveller sites will not influence the number, location or type of employment opportunities available in Kirklees, the proximity of sites to employment nodes can affect people's ability to access jobs.
employment opportunities available for local people, and	 Traveller sites that are within 0-20 minutes journey time (via non-car based modes of transport) of an employment node will have a significant positive (++) effect.
ensure that they are accessible.	 Traveller sites that are within 20-30 minutes journey time (via non-car based modes of transport) of an employment node will have a minor positive (+) effect.
	 Traveller sites that are within 30-40 minutes journey time (via non-car based modes of transport) of an employment node will have a negligible (0) effect.
	 Traveller sites that are within 40-50 minutes journey time (via non-car based modes of transport) of an employment node will have a minor negative (-) effect.
	Traveller sites that are more than 50 minutes journey time (via non-car based modes of transport) from an employment node will have a significant negative () effect.
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	The location of Traveller sites will not affect the success of the local economy. While the development of new sites may result in job creation during the construction phase, this is likely to be on a small scale will not be influenced by the location of the development. The provision of new Traveller sites may also affect the size and location of the local workforce; however this is considered separately under SA objective 1 above. Therefore, the effects of all Traveller site options will be negligible (0).
3. Ensure education facilities are available to all.	The effects of Traveller sites on this objective will depend to some extent on the availability of school and college places to serve the growing population.
	Effects will also depend on how accessible existing schools and colleges are from Traveller site options, although there are uncertainties as the effects will depend on there being capacity at those schools and colleges to accommodate new pupils.
	 Traveller sites that are within 0-15 minutes journey time (via non-car based modes of transport) of a primary school AND within 0-20 minutes of a secondary school are likely to have a significant positive (++?) effect. In addition, if a site is within 0-30 minutes of a further education facility this would also contribute to the significant positive effect.
	Traveller sites that are within 0-15 minutes journey time (via non-car based modes of transport) of a primary school OR

SA Objectives	SA Assumptions
	within 0-20 minutes of a secondary school are likely to have a minor positive (+?) effect.
	 Traveller sites that are within 15-30 minutes of a primary school AND within 20-40 minutes of a secondary school are likely to have a negligible (0?) effect.
	Traveller sites that are more than 30 minutes from a primary school OR more than 40 minutes from a secondary school are likely to have a minor negative (-?) effect.
	• Traveller sites that are more than 30 minutes from a primary school AND more than 40 minutes from a secondary school are likely to have a significant negative (?) effect.
4. Improve the health of local people and	The location of Traveller sites will not affect the number or location of healthcare facilities; however where healthcare facilities are easily accessible from Traveller sites there will be positive effects on residents' health.
ensure that they can access the health and social care they need.	 Traveller sites that are within 0-15 minutes journey time (via non-car based modes of transport) of a GP AND within 0-30 minutes of a hospital are likely to have a significant positive (++) effect.
social care they need.	 Traveller sites that are within 0-15 minutes journey time (via non-car based modes of transport) of a GP OR within 0-30 minutes of a hospital are likely to have a minor positive (+) effect.
	 Traveller sites that are within 15-30 minutes of a GP AND within 30-60 minutes of a hospital are likely to have a negligible (0) effect.
	 Traveller sites that are more than 30 minutes from a GP OR more than 60 minutes from a hospital are likely to have a minor negative (-) effect.
	 Traveller sites that are more than 30 minutes from a GP AND more than 60 minutes from a hospital are likely to have a significant negative () effect.
	Traveller sites within or adjacent to either of the two Air Quality Management Areas that have been declared in Kirklees could negatively affect the health of residents as result of exposure to poor air quality. Therefore, in addition to the above (which may result in mixed effects overall where a site is within or adjacent to an AQMA):
	 Sites that are within or adjacent to an AQMA would have a minor negative effect (-).
	Where a site is not within or adjacent to an AQMA, no score is given for this part of the SA objective and the score is based only on the accessibility of healthcare facilities.
5. Protect local amenity including avoiding noise and	Where the development of Traveller sites is proposed within close proximity of sensitive receptors there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase. The development of Traveller sites within close proximity of major roads or railways may result in noise pollution affecting residents of the new site in the longer

SA Objectives	SA Assumptions
light pollution.	 Sites that are surrounded by existing residential development or other sensitive receptors may have a significant negative () effect during the construction phase, and sites that are directly adjacent to an 'A' road, motorway or railway line or industrial area would have a significant negative () effect in the longer term.
	 Sites that are not surrounded by existing residential development or other sensitive receptors but which have such receptors within 100m may have a minor negative (-) effect during the construction phase. Sites that are not within 100m of residential development or other sensitive receptors would have a negligible (0) effect during the construction phase.
6. Retain and enhance access to local	The <u>location</u> of Traveller sites will not directly affect the number or range of services in a particular location; however the location of sites could affect this objective by influencing people's ability to access existing services and facilities.
services and facilities.	 Traveller sites that are within 0-5 minutes journey time (via non-car based modes of transport) of a local centre AND within 0-15 minutes of a town/District centre are likely to have a significant positive (++) effect.
	 Traveller sites that are within 0-5 minutes journey time (via non-car based modes of transport) of a local centre OR within 0-15 minutes of a town/District centre are likely to have a minor positive (+) effect.
	 Traveller sites that are within 5-15 minutes of a local centre AND within 30 minutes of a town/District centre are likely to have a negligible (0) effect.
	 Traveller sites that are within 5-15 minutes of a local centre OR within 30 minutes of a town/District centre are likely to have a minor negative (-) effect.
	 Traveller sites that are more than 15 minutes from a local centre AND more than 30 minutes from a town/District centre are likely to have a significant negative () effect.
7. Make our communities safer by reducing crime, antisocial behaviour and the fear of crime.	The effects of new Traveller sites on levels of crime and fear of crime will depend on factors such as the incorporation of green space within the sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of Traveller sites (rather they will be determined through the detailed proposals for each site) and so the effects of all of the potential Traveller sites on this SA objective will be negligible (0).
8. Protect and enhance existing and support the provision	The effects of potential Traveller sites on this SA objective will depend in part on the provision of open space or green infrastructure within the new development, which is unknown at this stage. However, proximity to existing recreational facilities and areas of open space will also influence effects, particularly if facilities are within walking distance (600m).
of new recreation	Sites that are within 600m of three or more areas of open space, playing fields/sports facilities, cycle paths, footpaths or

SA Objectives	SA Assumptions
facilities and areas of open space and encourage their usage.	bridleways are likely to have a significant positive (++) effect.
	 Sites that are within 600m of one or two areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways are likely to have a minor positive (+) effect.
	 Sites that are more than 600m from any areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways are likely to have a minor negative (-) effect.
9. Ensure all people are able to live in a decent home which meets their needs.	All of the potential Traveller sites are expected to have positive effects on this objective, due to the nature of the proposed development which would help to meet local need. Therefore, all sites are considered to have a significant positive (++) effect.
10. Secure an effective and safe	How well connected Traveller sites are to services, facilities and employment opportunities by sustainable modes of transport will affect the extent to which residents are able to make use of non car-based modes of transport day to day.
transport network which encourages people to make use of sustainable and active	The heat mapping work that has been carried out for Kirklees Council assessed the accessibility of eight different features ⁶³ from each site option on the basis of sustainable modes of transport, and maps the sites on a scale of green to red. Sites are mapped as green (and therefore considered as having good access) for the feature in question when they are within the journey time standards set out by the Department for Transport ⁶⁴ , which vary for each of the eight features.
modes of transport.	Sites that are mapped as green for at least four of the eight features are likely to have a significant positive (++) effect.
	 Sites that are mapped as green for between one and three of the eight features are likely to have a minor positive (+) effect.
	Sites that are mapped as green for none of the eight features are likely to have a significant negative () effect.
11. Secure the efficient and prudent use of land.	Where development takes place on greenfield land or areas of high quality agricultural land it is a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land.
	Sites that are entirely or mainly on greenfield land are likely to have a minor negative (-) effect.
	Sites that are entirely or mainly on brownfield land are likely to have a minor positive (+) effect.
	In addition, which may lead to mixed effects with the above:
	Sites that are mainly or entirely on greenfield land which is classed as being of Grade 1 agricultural quality would have a

⁶³ The eight features considered are: primary schools, secondary schools, further education, GPs, hospitals, employment nodes, local centres and town/district centres.
64 Guidance on DfT Accessibility Standards: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/372139/accessibility-statistics-guidance.pdf

SA Objectives	SA Assumptions
	significant negative () effect.
	 Sites that are mainly or entirely on greenfield land which is classed as being of Grade 2 or 3 agricultural quality would have a minor negative (-) effect.
12. Protect and enhance the character	A small area in the south of Kirklees lies within the Peak District National Park. Development within that part of the District could have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known.
of Kirklees and the quality of the	Sites that are within 500m of the National Park could have a significant negative effect (?) on the landscape.
landscape and townscape.	Outside of designated landscape areas, where development will take place on greenfield land, the character of the local environment is more likely to be affected. However, effects are uncertain depending on the design of new development and the quality of the landscape. Where a brownfield site is redeveloped it is likely that the overall character and appearance of the site will be improved as a result of new development, which is assumed to be of high quality, and this may benefit the appearance of the landscape/townscape. However, this is uncertain as it depends largely on the appearance of the development in comparison to what was on the site previously.
	Sites that are entirely or mainly on greenfield land may have a minor negative (-?) effect on this objective.
	Sites that are on brownfield land could have a minor positive (+?) effect on this objective.
	Information from the emerging Kirklees Landscape Character Assessment will also be taken into account as appropriate.
13. Conserve and enhance the historic environment, heritage	Historic England (formerly English Heritage) has been consulted on the list of Traveller site options being considered for allocation in the Kirklees Local Plan and has rated each site as either red, orange, yellow or green based on the likely effects on the historic environment of developing the site in question:
assets and their settings.	Red - The development of the site is likely to result in substantial harm to a designated heritage asset.
J. S. S. S.	Orange - The impact of the development of these sites on the historic environment is uncertain.
	Yellow- The allocation of this site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment.
	Green - The development of the site is unlikely to result in harm to any designated heritage asset.
	Sites that are rated red by Historic England could have a significant negative (?) effect.
	Sites that are rated yellow by Historic England could have a minor negative (-?) effect.
	Sites that are rated green by Historic England could have a negligible (0?) effect.
	Sites that are rated orange by Historic England would have an (?) uncertain effect.

SA Objectives	SA Assumptions
	In all cases, potential effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	Traveller sites that are within 250m of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, trampling etc. Conversely, there may be opportunities to promote habitat connectivity if sites include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.
	 Sites that are within 250m of one or more designated biodiversity or geodiversity sites may have a significant negative (?) effect.
	 Sites that are between 250m and 1km of one or more designated sites biodiversity or geodiversity sites may have a minor negative (-?) effect.
	Sites that are more than 1km from any designated biodiversity or geodiversity sites may have a negligible (0?) effect.
15. Reduce air, water and soil pollution.	The specific location of Traveller sites would not have a direct effect on levels of soil or water pollution, which would be influenced by factors such as whether there is capacity at the District's sewage treatment works to treat the additional wastewater generated by the overall scale of development proposed.
	Development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic from population growth in those areas could compound existing air quality problems.
	Sites that are within or directly adjacent to an AQMA are likely to have a minor negative () effect.
	Sites that are not within an AQMA will have a negligible (0) effect.
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to	While it is recognised that new development in any location may offer good opportunities to incorporate SuDS, development of new Traveller sites on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. National Planning Practice Guidance identifies caravans, mobile homes and park homes intended for permanent residential use as a 'highly vulnerable use', which is suitable in areas of flood zone 1 but would require an exception test in flood zone 2 and is unsuitable in flood zones 3a and 3b.
increased flood risk	Sites that are entirely or mainly within flood zones 2 or 3 are likely to have a significant negative () effect.

SA Objectives	SA Assumptions
for existing property and people.	 Sites that are on greenfield land outside of flood zones 2 and 3, or sites that are on brownfield land within flood zones 2 and 3 are likely to have a minor negative (-) effect.
	Sites that are on brownfield land outside of flood zones 2 and 3 are likely to have a negligible (0) effect.
17. Increase prevention, re-use, recovery and recycling of waste close to	The development of new Traveller sites will inevitably involve an increase in waste generation, but new developments may offer good opportunities for incorporating sustainable waste management practices, regardless of the location. Where development is proposed on brownfield land, there may be good opportunities for using existing buildings and materials although this is uncertain depending on the previous use of the site.
source.	 Sites on greenfield land are likely to have a minor negative (-) effect on this objective.
	 Sites on brownfield land may have a minor positive (+?) effect on this objective.
18. Increase efficiency in water, energy and raw material use.	While all new development is likely to involve an increase in energy and water consumption this will not be influenced by the <u>location</u> of Traveller sites. In addition, new development may offer good opportunities for incorporating renewable energy generation and water efficiency measures and it is assumed that new development will be built to high standards of efficiency.
	Similarly, all development will result in the increased consumption of minerals for construction but this will not be influenced by the location of Traveller sites (it is also noted that any built development associated with a Traveller site would be minimal). The location of development sites can influence the efficient use of minerals by the proximity of the development to Minerals Safeguarding Areas as development in those areas may sterilise mineral resources and restrict the availability of resources in the District. However, because of the extent of minerals resources within Kirklees, all sites would have the same effect. In addition, not all of the resources would necessarily be economically viable and it may be possible to achieve prior extraction to avoid sterilisation. Therefore, all sites will have a negligible (0) effect on this SA objective.
19. Reduce the contribution that the District makes to climate change.	The <u>location</u> of Traveller sites will not affect the contribution that built development makes to climate change. However, where Traveller sites are well-connected by sustainable transport links to employment nodes, services and facilities, levels of vehicle use and the associated greenhouse gas emissions are likely to be lower. Therefore, as for SA objective 10 above, the scores for this objective are based on the heat mapping work that has been carried out for Kirklees Council and takes into account how well connected each site is to the eight features assessed.
	Sites that are mapped as green for at least four of the eight features are likely to have a significant positive (++) effect.
	 Sites that are mapped as green for between one and three of the eight features are likely to have a minor positive (+) effect.
	Sites that are mapped as green for none of the eight features are likely to have a significant negative () effect.

Table A4.6: Assumptions for SA of minerals site options

SA Objectives	SA Assumptions
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	Minerals sites would have positive effects on job creation during site preparation, operation and restoration. However, the total number of new employment opportunities likely to be provided within Kirklees is not considered to be significant and would not be influenced by the location of sites. Employees at mineral sites are unlikely to be able to use sustainable transport to travel to work due to the predominant rural location of most mineral sites.
	Therefore, all site options are likely to have a minor positive (+) effect on this SA objective.
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	Minerals-related development would have a positive effect on the local economy in relation to growth within the minerals industry. In addition, allocating minerals sites would help to secure the supply of aggregates required to support wider economic growth and development in the District and elsewhere. However, these factors would not be influenced by the specific location of minerals sites and all site options are likely to have a minor positive (+) effect.
3. Ensure education facilities are available to all.	The location of minerals sites would not have a direct effect on this SA objective and all sites would have a negligible effect (0).
4. Improve the health of local people and ensure that they can access the health and social care they need.	Minerals sites near to sensitive receptors such as residential areas could affect people's health or their perceptions of health. Dust from blasting/drilling and other sources within the site may cause concern to nearby residents and communities; however research undertaken in 1995 ⁶⁵ excluded any health effects of dust generated by surface mineral operations. Therefore, it is not considered likely that mineral extraction in Kirklees would have a significant negative effect on health, although minor negative effects may be experienced or perceived by some people living or working close to sites.
	National Planning Practice Guidance for Minerals ⁶⁶ states that the relationship of the activities within mineral workings to surrounding land uses, in regards to dust emissions, will vary from site to site. Since the nature of those land uses varies, so will their sensitivity to dust. Evidence included in the former Annex I: Dust of Minerals Policy Statement 2 and National Planning Practice Guidance for Minerals, states that residents can be affected by dust up to 1km from the source, and that additional measures to control PM ₁₀ might be necessary if the actual source of emission is within 1km of any residential property or other sensitive use. However, former Annex I of Minerals Policy Statement 2 also states that concerns about dust are most likely to be experienced near to dust sources, generally within 100m depending on site characteristics and in the

⁶⁵ Office of the Deputy Prime Minister (by Arup Environmental/Ove Arup and Partners). The Environmental Effects of Dust from Surface Minerals Workings, 1995.
66 Available at: http://planningguidance.planningportal.gov.uk/blog/guidance/minerals/assessing-environmental-impacts-from-minerals-extraction/dust-emissions/.

SA Objectives	SA Assumptions	
	absence of appropriate mitigation.	
	The NPPF is clear that minerals planning authorities should ensure that unavoidable dust emissions are controlled and mitigated or removed at source. Therefore it is assumed that mineral extraction at any of the potential sites will be well operated and that mitigation measures implemented should be sufficient to avoid any potential health effects.	
	 Minerals sites within 100m of sensitive receptors could have minor negative effects on health as a result of dust; however this is uncertain (-?) depending on factors such as topography, the nature of the landscape, the respective location of the site and the nearest residential property or other sensitive use in relation to the prevailing wind direction and visibility. 	
	Minerals sites that are more than 100m from sensitive receptors would have a negligible (0) effect on this objective.	
5. Protect local amenity including avoiding noise and light pollution.	Minerals sites could affect local amenity as a result of noise, vibration and light pollution during site preparation, operation and restoration as well as the transporting of minerals from the site. The extent of effects on local amenity will depend on the type of mineral extracted on the site, the scale of the operations and the type of activities undertaken within the site, as well as the proximity of sensitive receptors.	
	• Coal and sandstone sites which are within 500m of sensitive receptors could have a minor negative effect on amenity, although this is uncertain (-?) depending on the type of mineral site, the scale of the operations and the type of activities undertaken within the site and potential mitigation measures proposed.	
	• Sand and gravel, clay and shale sites which are within 250m of sensitive receptors could have a minor negative effect on amenity, although this is uncertain (-?) depending on the type of mineral site, the scale of the operations and the type of activities undertaken within the site and potential mitigation measures proposed.	
	Coal and sandstone sites that are more than 500m from sensitive receptors, and sand and gravel, clay and shale sites that are more than 250m from sensitive receptors would have a negligible (0) effect on amenity.	
6. Retain and enhance access to local services and facilities.	The location of minerals sites would not have a direct effect on this SA objective and all sites would have a negligible effect (0).	
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	The location of minerals sites would not have a direct effect on this SA objective and all sites would have a negligible effect (0).	
8. Protect and enhance existing and support the	The location of minerals sites could affect people's enjoyment of recreational facilities such as nearby open space, Public	

SA Objectives	SA Assumptions	
provision of new	Rights of Way (PRoW) and recreation facilities.	
recreation facilities and areas of open space and encourage their usage.	 Mineral sites which include a leisure or recreational facility or open space, including PRoW could have a significant negative () effect on the amenity of users of PRoW and other users of the countryside, as development of the sites would either mean removing part of a facility/open space, or removing or temporarily closing land which has potential for recreation/access to the countryside. 	
	 Mineral sites which are within 250m of a leisure or recreational facility or open space, including PRoW could have a minor negative (-) effect on the amenity of users of PRoW and other users of the countryside by making the facilities/countryside less attractive for users and impacting on amenity. 	
	 Mineral sites which are more than 250m from a leisure or recreational facility or open space, including PRoW would have a negligible (0) effect. 	
	In addition, which will result in mixed effects overall:	
	• The restoration of minerals sites is increasingly adopting innovative practice and this could have a minor positive (+?) effect on providing recreation opportunities for all sites irrespective of their location. However, this would be very dependent on the exact nature and proposed design of the restoration of the minerals site, which would not be known until the planning application stage. Therefore, the positive effect is uncertain.	
9. Ensure all people are able to live in a decent home which meets their needs.	Allocating minerals sites would help to secure the supply of aggregates required to support housing development in the District and elsewhere; however this would not be influenced by the location of minerals sites. Therefore, all sites would have a negligible (0) 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.	Employees at minerals sites are unlikely to be able to use sustainable transport to travel to work due to the predominant rural location of most mineral sites. Proximity to rail lines/depots/sidings, rivers/canals or wharves could provide opportunities to explore more sustainable modes of transporting aggregates although effects are uncertain depending on whether there are wharves or depots that could be used. • Minerals sites within 1km of a railway or canal could have a minor positive effect on this SA objective although this is	
	uncertain (+?).	
	Minerals sites that are more than 1km of a railway or canal would have a negligible (0) effect on this SA objective.	
11. Secure the efficient and prudent use of land.	Where minerals-related development takes place on high quality agricultural land it is a less efficient use of land than development on lower quality agricultural land. However, the NPPF states that local planning authorities should put in place policies to ensure that high quality restoration and aftercare of mineral sites takes place, including for agriculture (safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources). In some	

SA Objectives	SA Assumptions	
	instances, depending on the proposed restoration process agreed for sites, soils could be reused during restoration.	
	 Minerals sites on Grade 1, 2 or 3 agricultural land would have a significant negative () effect. 	
	 Minerals sites on Grade 4 or 5 agricultural land would have a minor negative (-) effect. 	
12. Protect and enhance the character of Kirklees and the quality of the	A small area in the south of Kirklees lies within the Peak District National Park. Minerals-related development within that part of the District could have a negative effect on the quality of the landscape although that is uncertain until the design of the development is known.	
landscape and townscape.	Sites that are within 500m of the National Park could have a significant negative effect (?) on the landscape.	
	Outside of designated areas, areas of high landscape quality and the setting of settlements may be affected by the development of minerals sites. In addition, areas with poor landscape character could be enhanced in the longer-term through the creation of high quality restored minerals sites. However, this will not be able to be determined until the planning application stage, and will depend upon factors such as: how prominent sites are in the landscape; the level of screening; and the character of the surrounding landscape.	
	Therefore, the potential for a negative effect on the landscape is identified for all minerals sites although this is currently uncertain (-?).	
13. Conserve and enhance the historic environment, heritage assets and their	Historic England (formerly English Heritage) has been consulted on all proposed new minerals site options being considered for allocation in the Kirklees Local Plan and has rated each site as either red, orange, yellow or green based on the likely effects on the historic environment of developing the site in question:	
settings.	Red - The development of the site is likely to result in substantial harm to a designated heritage asset.	
	Orange - The impact of the development of these sites on the historic environment is uncertain.	
	Yellow- The allocation of this site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment.	
	Green - The development of the site is unlikely to result in harm to any designated heritage asset.	
	Sites that are rated red by Historic England could have a significant negative (?) effect.	
	 Sites that are rated yellow by Historic England could have a minor negative (-?) effect. 	
	Sites that are rated green by Historic England could have a negligible (0?) effect.	
	Sites that are rated orange by Historic England would have an (?) uncertain effect.	
	In all cases, potential effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact	

SA Objectives	SA Assumptions	
	scale, design and layout of the new development.	
	For active mineral sites or those with extant planning permission, the impact on historic environment has been assessed as part of the planning permission for the development. The impact of allocating these sites on the historic environment has therefore already been previously accepted, and it is considered that allocating them in the Kirklees Local Plan would have a negligible(0) effect on the historic environment, though this would be uncertain (?) as it would depend on the final design of the restoration of the site.	
14. Maximise opportunities to protect and enhance biodiversity	Minerals sites that are within 250m of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution etc. However, the potential for negative effects is uncertain and will depend on the incorporation of mitigation.	
and geodiversity.	In addition, the design of and restoration of mineral sites is increasingly adopting innovative practice to contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. There may be opportunities for sites to contribute towards national and local biodiversity targets during the restoration stage of the site, supporting ecological networks surrounding the site and incorporating the use of native species and habitats to encourage biodiversity within the site. However, this would be very dependent on the exact nature and proposed design of the planned mineral site, which would not be known until the planning application stage.	
	 Sites that are within 250m of one or more designated biodiversity or geodiversity sites may have a significant negative (?) effect. 	
	 Sites that are between 250m and 1km of one or more designated sites biodiversity or geodiversity sites may have a minor negative (-?) effect. 	
	Sites that are more than 1km from any designated biodiversity or geodiversity sites may have a negligible (0?) effect.	
	In addition, there is the potential for all sites to deliver biodiversity benefits in the long term; therefore a potential minor positive (+?) effect is also identified in relation to all sites.	
15. Reduce air, water and soil pollution.	The location of minerals sites would not have a direct effect on soil quality (soil loss is addressed under SA objective 11 above).	
	Mineral sites that are in Source Protection Zone (SPZ) 1 or adjacent to a water body could potentially lead to loss of contaminants or accidental pollution incidents, and may affect water flows.	
	Minerals development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic (particularly HGV movements) in those areas could compound existing air quality problems.	
	Sites within SPZ1 and/or within/adjacent to a water body have the potential to have a minor negative effect.	

SA Objectives	SA Assumptions
	However, this effect would be uncertain (-?) as it would be very dependent on the exact nature, working and proposed design of the site. In addition: • Sites that are within or directly adjacent to an AQMA are likely to have a significant negative () effect.
	Sites that are not within an AQMA or SPZ1 will have a negligible (0) effect.
16. Prevent inappropriate new development in flood risk areas and ensure development does not	National Planning Practice Guidance identifies minerals working and processing (except sand & gravel working) as less vulnerable uses, which means that they are potentially compatible with all flood zones except for Flood Zone 3b, the functional floodplain. Sand and gravel workings are classed as water-compatible development and are potentially suitable for all flood zones including 3b, the functional floodplain.
contribute to increased flood risk for existing property and people.	Some sites, which may dewater, may hold the potential to store excess water in times of heavy rain, which would be seen as a positive in terms of preventing flood risk. However, this would not be known until the planning application stage.
property and people.	 Sites proposed for any uses apart from sand and gravel extraction that are entirely or mainly within flood zone 3b are likely to have a significant negative () effect.
	 Sites proposed for any minerals-related use that are entirely or mainly outside of flood zone 3b are likely to have a negligible (0) effect.
17. Increase prevention, re-use, recovery and recycling of waste close to source.	The location of minerals sites would not have a direct effect on this SA objective and all sites would have a negligible effect (0).
18. Increase efficiency in water, energy and raw	While all new development will inevitably involve an increase in energy and water consumption this will not be influenced by the location of minerals sites.
material use.	The effects of minerals sites on the efficient use of raw materials will depend on the nature of the minerals-related activities, i.e. if they involve processing recycled aggregates. However, this will again not be influenced by the location of sites and all sites will have a negligible (0) effect on this objective.
19. Reduce the contribution that the District makes to climate	The location of minerals sites will not have a direct effect on the District's contribution to climate change. Future employees of potential mineral sites are unlikely to be able to use sustainable transport to travel to work due to the predominant rural location of most mineral sites.
change.	Therefore, all minerals sites are likely to have a negligible (0) effect on this objective.

Table A4.7: Assumptions for SA of waste site options

SA Objectives	SA Assumptions	
1: Increase the number and range of	Waste sites in any location would have positive effects on job creation; however, the total numbers of new employment opportunities likely to be provided within the District is not considered to be significant.	
employment opportunities	Effects on the accessibility of the jobs created would depend on the proximity of sites to public transport links.	
available for local people, and ensure	 Waste sites that are within walking distance (600m) of at least one public transport link would have a minor positive (+) effect. 	
that they are accessible.	Waste sites that are not within walking distance (600m) of any public transport links would have a negligible (0) effect.	
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	Waste-related development would have a positive effect on the local economy in relation to growth within the waste industry, although this is not likely to be significant and would not be determined by the location of waste sites. Therefore, all waste site options would have a minor positive (+) effect on this objective.	
	Waste sites that would be used for landfill and then restored to water-related uses can increase bird-strike risk if they are planned near commercial or military aerodromes because where birds congregate in large numbers, they can provide a hazard to aircraft at locations close to aerodromes or low flying areas. Therefore, where sites are within an aerodrome safeguarding area there may also be a minor negative effect although this is uncertain (-?) depending on the restoration proposals for the site.	
3. Ensure education facilities are available to all.	While some waste facilities may include educational visitor centres, the location of waste sites would not have a direct effect on this SA objective and all sites would have a negligible effect (0).	
4. Improve the health of local people and ensure that they can access the health and social care they need.	Some types of waste facilities could have a negative effect on health due to the biospores or gaseous emissions that may be released from certain waste management technologies such as composting, anaerobic digestion or producing energy from waste. However, Government research conducted in 2004 ⁶⁷ , reviewed evidence from a large range of studies, and concluded that modern waste management practices have at most a minor effect on human health. The minor effects related only to possible effects on residents living close to two types of waste management facility: landfills or commercial composting facilities.	
	Sites which are more than 250m from sensitive receptors would have a negligible (0) effect on health.	
	Sites which are within 250m of sensitive receptors may have a minor negative effect on health although this is uncertain (-	

⁶⁷ Review of Environmental and Health Effects of Waste Management: Municipal Solid Waste and Similar Wastes. Prepared for Defra by Enviros and University of Birmingham, May 2004.

SA Objectives	SA Assumptions	
	?) depending on the nature of the sites e.g. whether they are used for landfill or commercial composting.	
5. Protect local amenity including avoiding noise and light pollution.	Waste facilities could have a negative effect on amenity as a result of noise, traffic, and light pollution during construction and potentially during operation as well. • Sites which are more than 250m from sensitive receptors would have a negligible (0) effect on amenity. • Sites which are within 250m of sensitive receptors may have a minor negative (-) effect on amenity.	
6. Retain and enhance access to local services and facilities.	The location of waste sites would not have a direct effect on this SA objective and all sites would have a negligible effect (0).	
7. Make our communities safer by reducing crime, antisocial behaviour and the fear of crime.	The location of waste sites would not have a direct effect on this SA objective and all sites would have a negligible effect (0).	
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	The location of waste facilities could affect people's enjoyment of recreational facilities such as nearby open space, Public Rights of Way (PRoW) and recreation facilities.	
	 Waste sites which include a leisure or recreational facility or open space, including PRoW could have a significant negative () effect on the amenity of users of PRoW and other users of the countryside, as development of the sites would either mean removing part of a facility/open space, or removing or temporarily closing land which has potential for recreation/access to the countryside. 	
	 Waste sites which are within 250m of a leisure or recreational facility or open space, including PRoW could have a minor negative (-) effect on the amenity of users of PRoW and other users of the countryside by making the facilities/countryside less attractive for users and impacting on amenity. 	
	 Waste sites which are more than 250m from a leisure or recreational facility or open space, including PRoW would have a negligible (0) effect. 	
	The restoration of landfill sites could have a minor positive effect on providing recreation opportunities for all sites irrespective of their location. However, this would be very dependent on the exact nature and proposed design of the restoration of the landfill site, which would not be known until the planning application stage. Therefore, the minor positive effect is uncertain (+?).	

SA Objectives	SA Assumptions	
9. Ensure all people are able to live in a decent home which meets their needs.	The location of waste sites would not have a direct effect on this SA objective and all sites would have a negligible effect (0).	
10. Secure an effective and safe transport network which encourages	The effects of waste sites on this SA objective will depend in part on whether employees are able to make use of sustainable modes of transport to get to work, and in part on the proximity of sites to sustainable transport links that may be able to be used for the transportation of waste. • Waste sites within 1km of a railway or canal could have a minor positive effect on this SA objective although this is	
people to make use of sustainable and	uncertain (+?) depending on whether there are wharves or depots that could be used for the transportation of waste.	
active modes of transport.	 Waste sites that are more than 1km of a railway or canal would have a negligible (0) effect in relation to the sustainable transport of waste. 	
	In addition, which could lead to mixed effects overall:	
	Waste sites that are within walking distance (600m) of public transport nodes would have a minor positive (+) effect.	
	Waste sites that are not within walking distance (600m) of public transport nodes would have a minor negative (-) effect.	
11. Secure the efficient and prudent	Where waste-related development takes place on high quality agricultural land it is a less efficient use of land than development on lower quality agricultural land.	
use of land.	 Waste sites on greenfield land which is classed as being of Grade 1, 2 or 3 agricultural quality would have a significant negative () effect. 	
	 Waste sites on greenfield land which is classed as being of Grade 4 or 5 agricultural quality would have a minor negative (-) effect. 	
	Waste sites on brownfield land would have a minor positive (+) effect.	
12. Protect and enhance the character of Kirklees and the quality of the landscape and	The design of modern waste management facilities is increasingly adopting innovative practice and this could have positive effects on this SA objective. However, this would be very dependent on the exact nature and proposed design of the planned waste facility type, which would not be known until the planning application stage.	
	Where sites are proposed for landfill, there may be a minor negative effect (-?) on the landscape.	
townscape.	For enclosed waste facilities:	
	Sites on greenfield land are likely to have a minor negative (-) effect on this objective.	

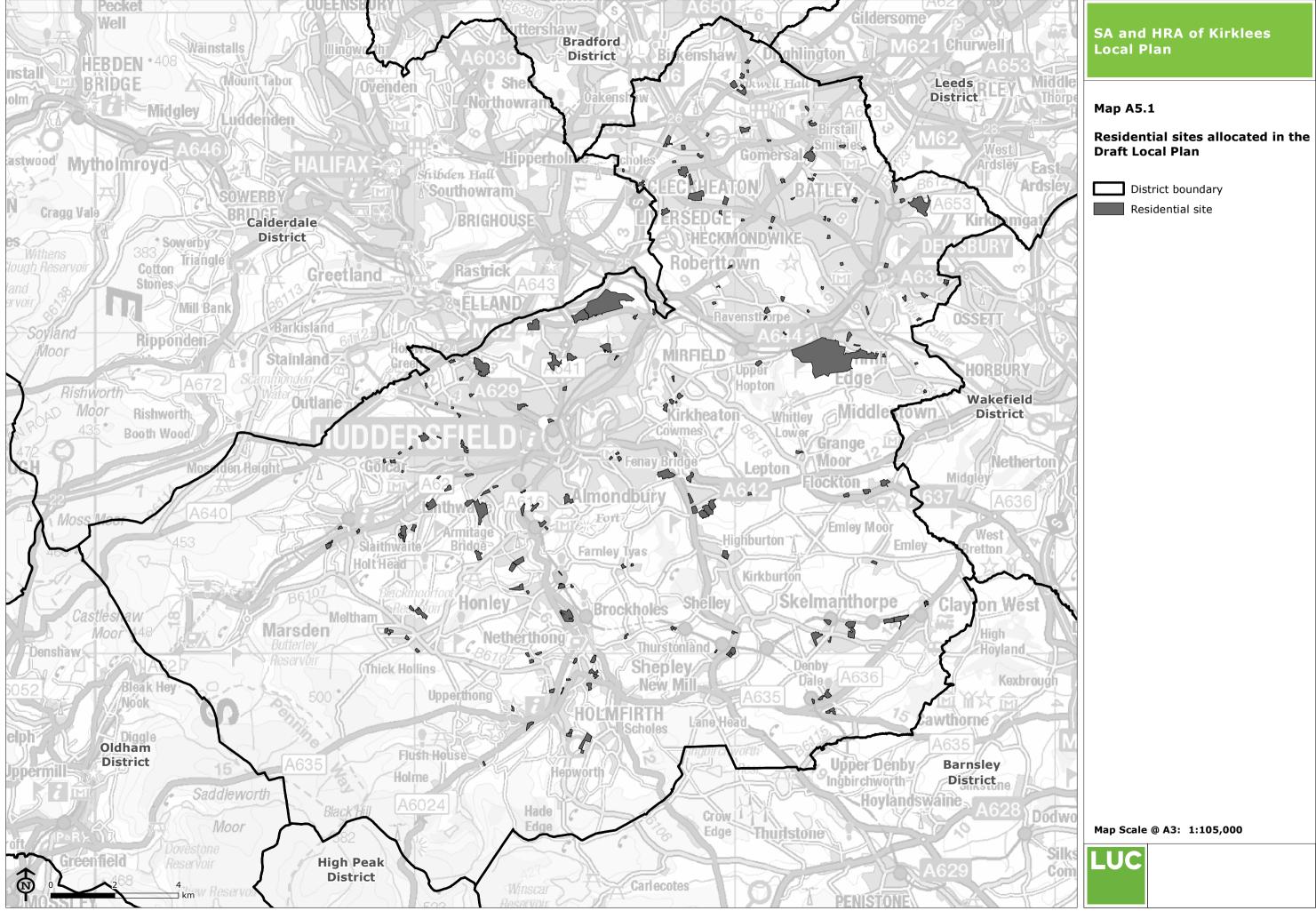
SA Objectives	SA Assumptions	
	 Sites on brownfield land may have a minor positive (+?) effect on this objective (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect). 	
13. Conserve and enhance the historic environment,	Historic England (formerly English Heritage) has been consulted on the list of waste site options being considered for allocation in the Kirklees Local Plan and has rated each site as either red, orange, yellow or green based on the likely effects on the historic environment of developing the site in question:	
heritage assets and their settings.	Red - The development of the site is likely to result in substantial harm to a designated heritage asset.	
	Orange - The impact of the development of these sites on the historic environment is uncertain.	
	Yellow- The allocation of this site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment.	
	Green - The development of the site is unlikely to result in harm to any designated heritage asset.	
	Sites that are rated red by Historic England could have a significant negative (?) effect.	
	Sites that are rated yellow by Historic England could have a minor negative (-?) effect.	
	Sites that are rated green by Historic England could have a negligible (0?) effect.	
	Sites that are rated orange by Historic England would have an (?) uncertain effect.	
	In all cases, potential effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development.	
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	Waste sites that are within 250m of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution etc. However, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.	
	• Sites that are within 250m of one or more designated biodiversity or geodiversity sites may have a significant negative (?) effect.	
	 Sites that are between 250m and 1km of one or more designated sites biodiversity or geodiversity sites may have a minor negative (-?) effect. 	
	Sites that are more than 1km from any designated biodiversity or geodiversity sites may have a negligible (0?) effect.	

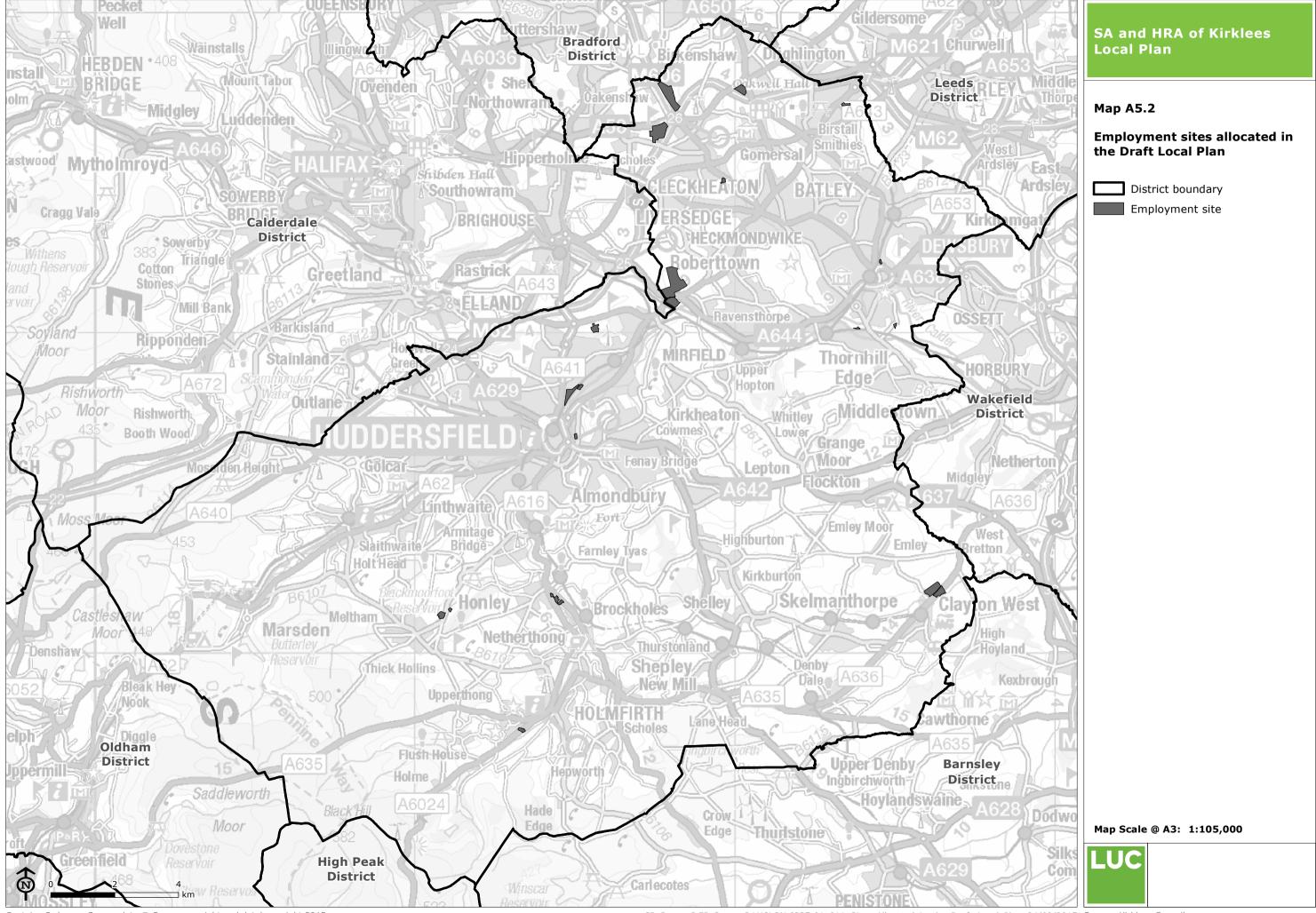
SA Objectives	SA Assumptions	
15. Reduce air, water and soil pollution.	The extent to which a waste management facility will affect ground and surface water on a potential site depends on the type of waste facility. Open air facilities such as open windrow composting and landfills could potentially lead to loss of contaminants or accidental pollution incidents to surface or ground water.	
	 Sites that are located on Groundwater Source Protection Zone 4 (SPZ4 'Zone of Special Interest') and/or would be used for enclosed waste facilities (such as Transfer Stations, Minerals Recycling Facilities, Mechanical Biological Treatment, Anaerobic digestion or 'in vessel' composting) are likely to have a negligible (0) effect on ground and surface water quality. 	
	 Sites that are located in Groundwater Source Protection Zones 2 or 3 (SPZS 2 'Outer Protection Zone' or SPZ3 'Source Catchment Protection Zone') and/or would be used for inert waste landfill or open air composting and/or are located adjacent to waterbodies are likely to have a minor negative (-) effect on groundwater quality. 	
	 Sites that are located in Groundwater Source Protection Zone 1 (SPZ1 'Inner Protection Zone') and/or would be used for non-inert landfill and/or are located adjacent to waterbodies are likely to have a significant negative () effect on water quality. 	
	Proposals for all types of waste management facilities are likely to lead to air pollution with regards to waste transportation by road, and some open air waste management processes could also result in increased air pollution (for example when bio-aerosols such as spores or microbes on fine dust can arise from open air composting facilities). Increased levels of dust also arise from other outdoor operations. The use of open air processing facilities (such as composting, aggregate recycling and processing and landfill) or enclosed facilities such as enclosed thermal treatment processes (which release gases) on the site when developed could have negative effects on avoiding air pollution. Waste-related development within one of the two AQMAs that have been declared in Kirklees is likely to have a negative effect on air pollution as increased vehicle traffic (particularly HGV movements) in those areas could compound existing air quality problems.	
	Sites that are within or directly adjacent to an AQMA are likely to have a significant negative () effect on reducing air pollution. Sites that are not within an AQMA will have a minor pogative () effect on reducing air pollution.	
	Sites that are not within an AQMA will have a minor negative (-) effect on reducing air pollution.	
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	National Planning Practice Guidance identifies landfill sites and sites used for the management of hazardous waste as more vulnerable uses, which means that they are suitable in flood zones 1 and 2, but unsuitable in flood zone 3b and an exception test is required in flood zone 3a. Other waste treatment facilities are classed as less vulnerable, which means that they are potentially compatible with all flood zones except for Flood Zone 3b, the functional floodplain. Therefore, effects on this SA objective depend largely on the nature of the waste management facilities that may be developed on each site.	
	 Sites proposed for landfill or hazardous waste that are entirely or mainly within flood zone 3b or 3a, or sites proposed for other waste management activities that are entirely or mainly within flood zone 3b, are likely to have a significant negative () effect. 	

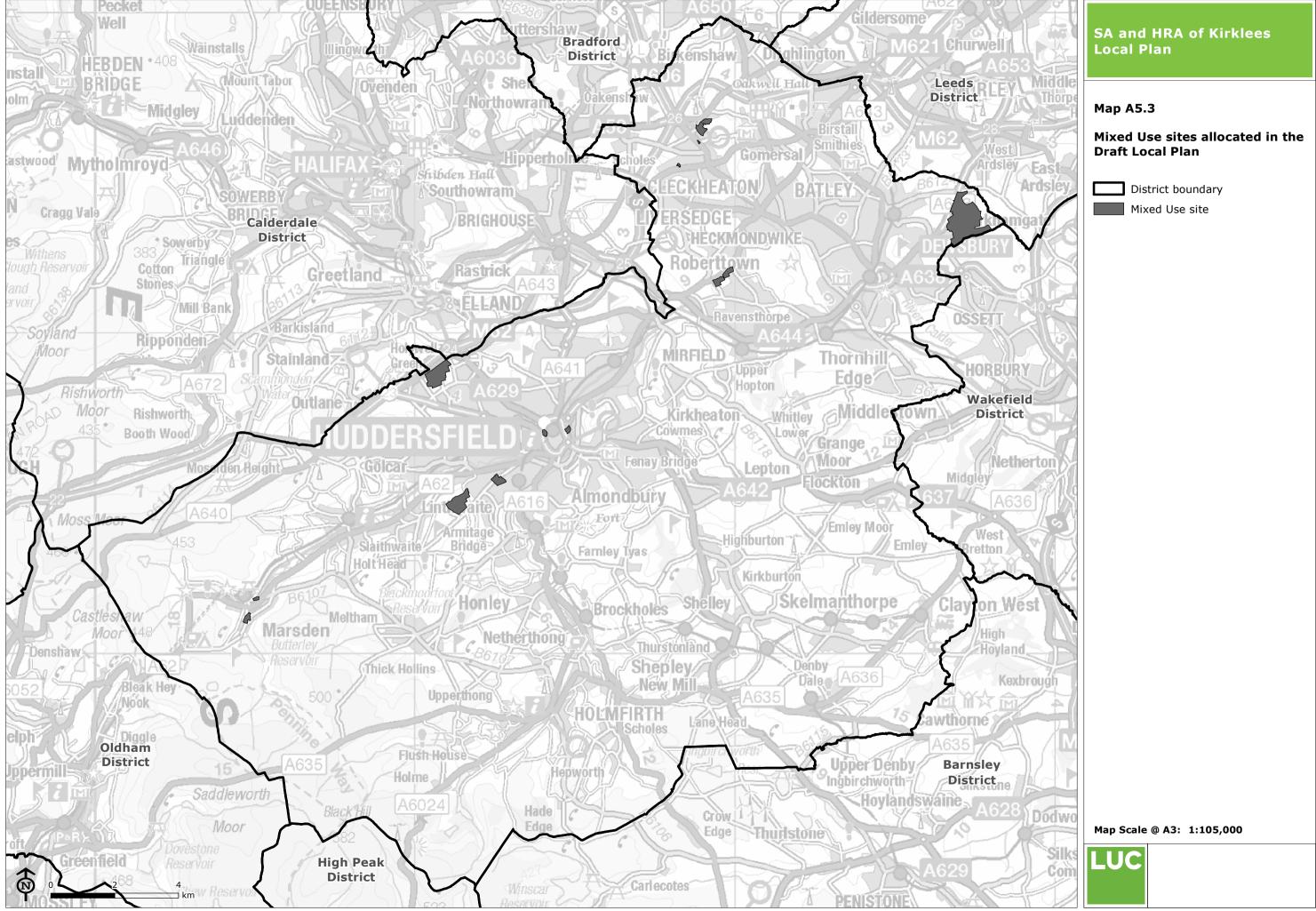
SA Objectives	SA Assumptions	
	 Sites proposed for landfill or hazardous waste that are entirely or mainly outside of flood zones 3a or 3b, or sites proposed for other waste management activities that are entirely or mainly outside of flood zone 3b, are likely to have a negligible (0) effect. 	
17. Increase prevention, re-use, recovery and recycling of waste close to source.	The effects of waste site options on this SA objective will depend on the nature of the waste management activities that take place there, rather than on their spatial location. Therefore, all sites would have a negligible (0) effect on this SA objective.	
18. Increase efficiency in water, energy and raw	While all new development is likely to involve an increase in energy and water consumption this will not be influenced by the <u>location</u> of waste sites. In addition, new development may offer good opportunities for incorporating renewable energy generation and water efficiency measures and it is assumed that new development will be built to high standards of efficiency.	
material use.	Similarly, all development will result in the increased consumption of minerals for construction but this will not be influenced by the location of waste sites. The location of development sites can influence the efficient use of minerals by the proximity of the development to Minerals Safeguarding Areas as development in those areas may sterilise mineral resources and restrict the availability of resources in the District. However, because of the extent of minerals resources within Kirklees, all sites would have the same effect. In addition, not all of the resources would necessarily be economically viable and it may be possible to achieve prior extraction to avoid sterilisation. Therefore, all sites will have a negligible (0) effect on this SA objective.	
19. Reduce the contribution that the District makes to climate change.	The effects of waste site options on this SA objective will depend largely on the type of waste management facilities proposed for each site as certain types of waste management could contribute to energy generation.	
	 Sites that are proposed for Energy from Waste (EfW) facilities could have a positive (+) effect on this objective. Sites proposed for other uses would have a negligible (0) effect. 	

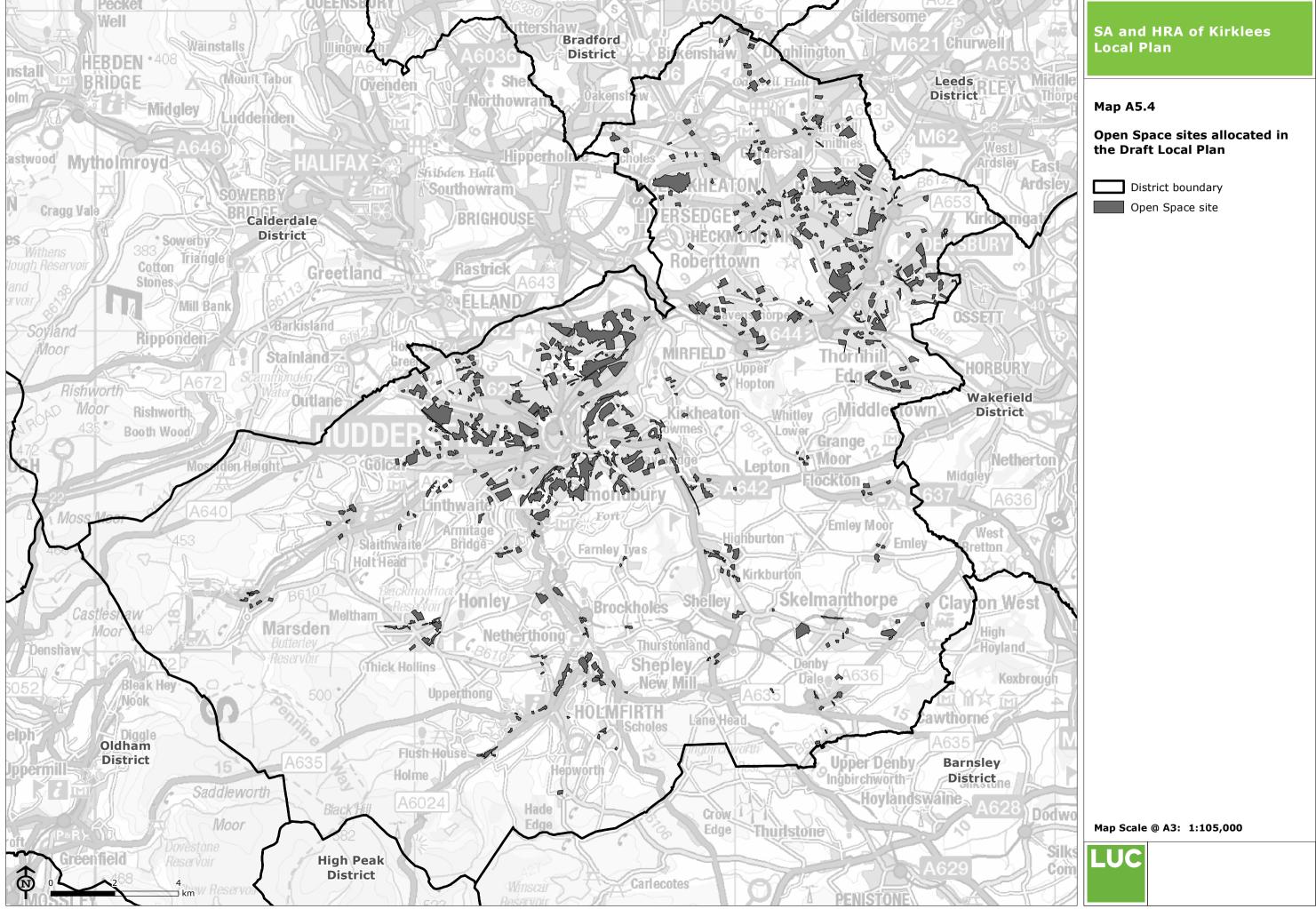
Appendix 5

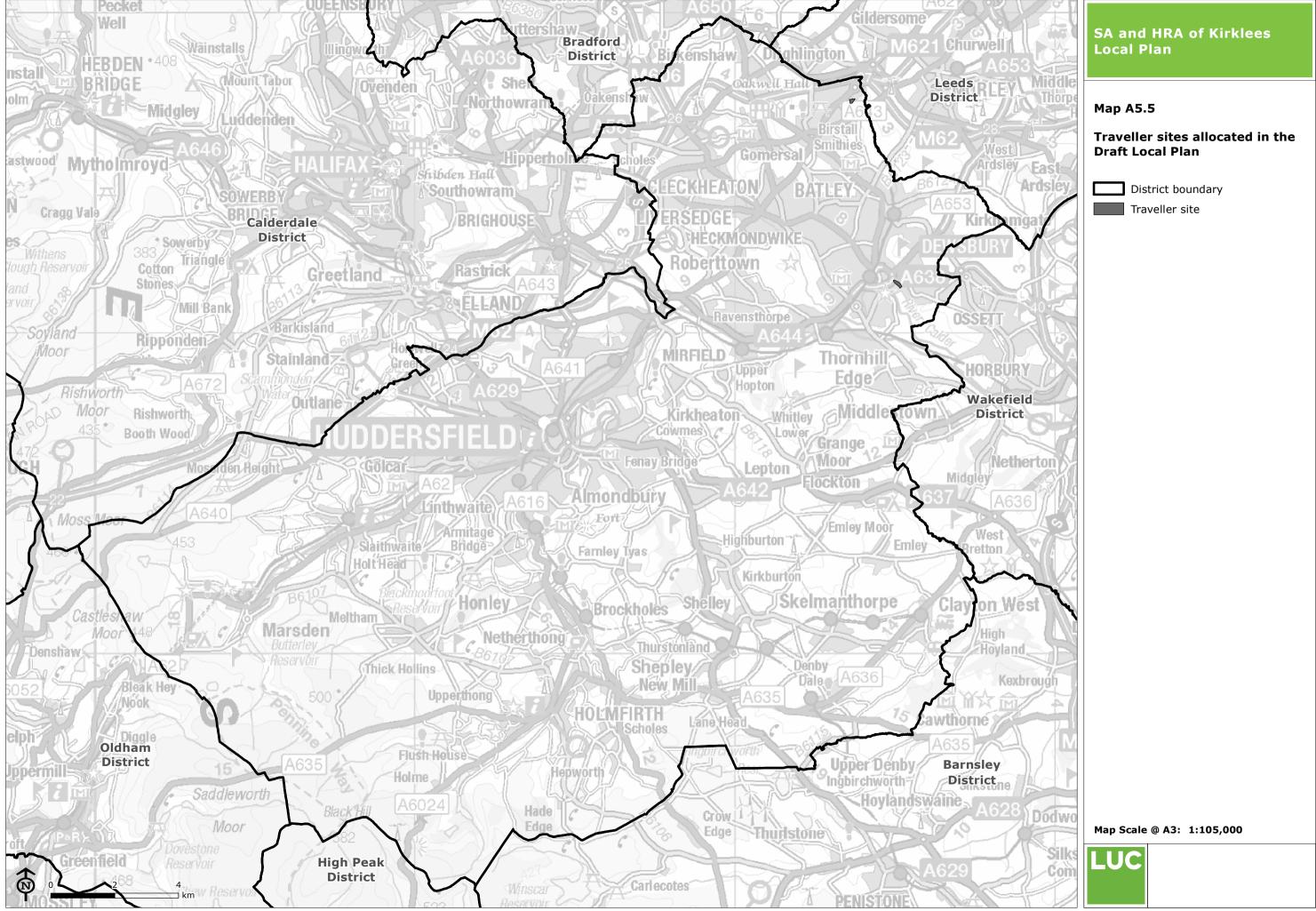
Maps showing the Allocated Sites

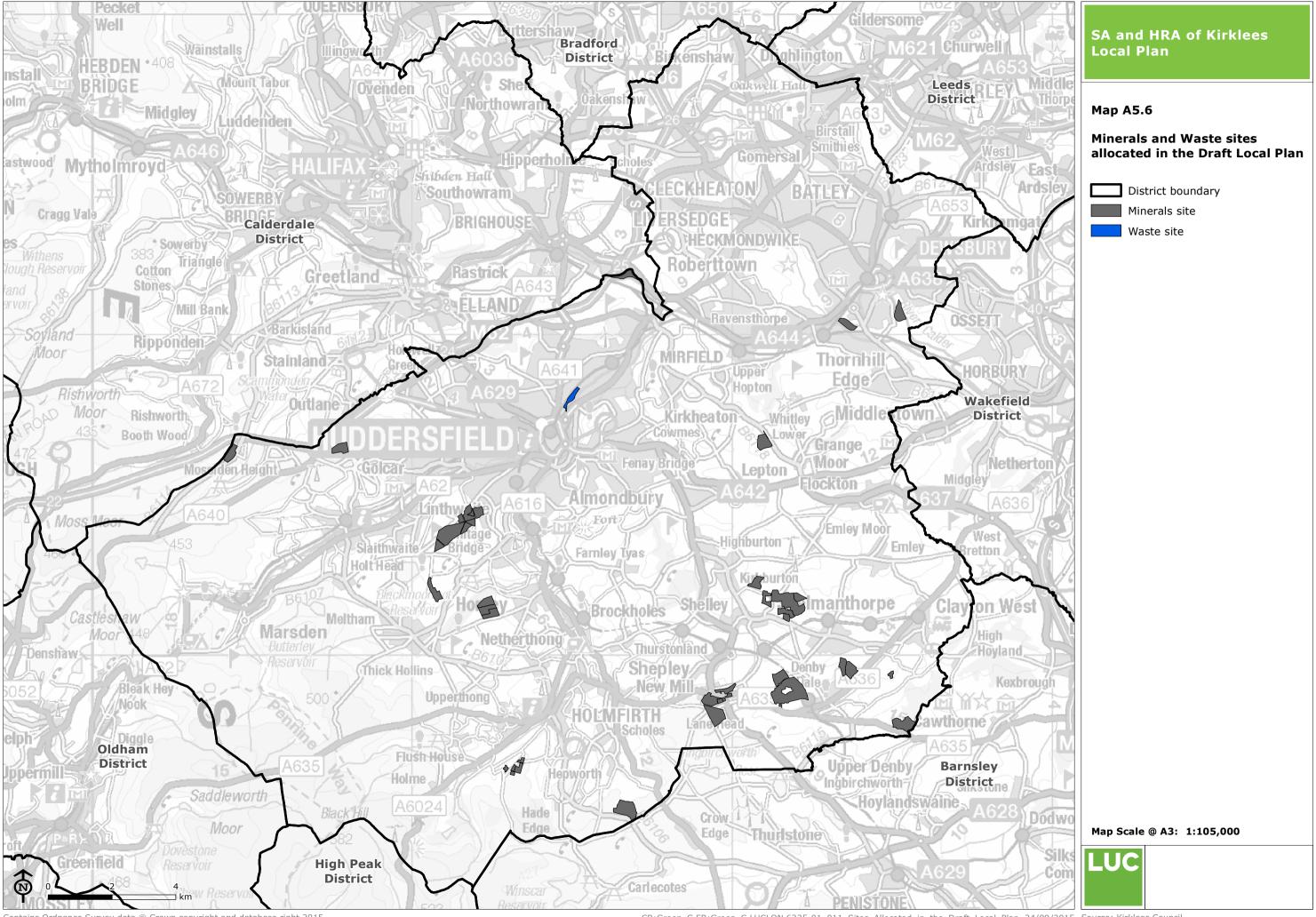












Appendix 6

Equalities Impact Assessment

Kirklees Local Plan: Equalities Impact Assessment

- 1. This appendix presents the findings of an assessment of the likely effects of the Draft Kirklees Local Plan on equality issues. The findings of this Equalities Impact Assessment (EqIA) will feed into the development of the next version of the Local Plan, along with the outcomes of the consultation on the Draft Local Plan and the findings of the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).
- 2. The requirement to undertake formal Equalities Impact Assessment (EqIA) of plans was introduced in the Equality Act 2010, but was abolished in 2012 as part of a Government bid to reduce bureaucracy. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions. In fulfilling this duty, many authorities still find it useful to produce a written record of equalities issues having been specifically considered. That is the purpose of this appendix.
- 3. The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination on the basis of these characteristics. They are:
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation
- 4. There are three main duties set out in the Equality Act 2010, which public authorities including Kirklees Council must meet in exercising their functions:
 - To eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act.
 - To advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it.
 - To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Kirklees Local Plan

- 5. As described in the main body of this SA report, the latest version of the Kirklees Local Plan, the Draft version (November 2015), sets out a vision, 10 strategic objectives and 65 draft policies in one document ('Strategy and Policies') and in a second document ('Allocations and Designations'), specific sites are allocated for housing, employment and mixed use development, Traveller sites, open space and minerals and waste sites.
- 6. The purpose of the Local Plan is to guide development in the District up to 2031. Strategic planning is only one of the functions of Kirklees Council, so it is not expected that the Local Plan alone would address all of the duties of the Equalities Act.

Baseline Information

7. The Draft version of the Local Plan (November 2015) and Appendix 3 in the main body of this SA Report set out baseline information about Kirklees, including some information relevant to the

protected characteristics covered by the Equalities Act. The most relevant information is summarised below.

- In 2011 the mean age of the Kirklees population was 38.4 years. This compared to an England and Wales average of 39.3 years. In 2011, 15.8% of the resident population in Kirklees were of retirement age (65 and over for males or 60 and over for females) compared with 19.3% in England and Wales.
- In the 2011 census results 79.1% of the Kirklees population was classed as white, with black and minority ethnic communities accounting for approximately 20.9% of the population.
- The health of people in Kirklees is varied compared with the England average. Deprivation is higher than average and about 20% (17,000) children live in poverty. Life expectancy for both men and women is lower than the England average.
- 8. There is little baseline information available that is directly relevant to other protected characteristics including gender reassignment, marriage and civil partnership, pregnancy and maternity, sex or sexual orientation.

Method

- 9. The Draft Local Plan has been reviewed to consider the likely impacts of the policies on each of the nine protected characteristics from the Equality Act 2010 listed above. For each protected characteristic, consideration has been given to whether the Local Plan is compatible or incompatible with the three main duties set out in the Equality Act 2010.
- 10. A colour coded scoring system has been used to show the effects that the Draft Local Plan is likely to have on each protected characteristics, as shown below.

Score	Likely Effect
+	Positive
0	Neutral
-	Negative

Findings

- 11. The findings of the equalities assessment are presented in **Table A6.1** overleaf. Although it does not directly affect a number of the protected characteristics, the Draft Local Plan has either a positive or neutral relationship with all of the protected characteristics considered in this assessment, and is therefore generally compatible with the three main duties of the Equality Act 2010.
- 12. The Draft Local Plan does not include any direct or indirect references to gender reassignment, marriage and civil partnership, sex and sexual orientation and does not include policies or proposals that are considered to have a direct effect on these four protected characteristics. For the other five protected characteristics, the Draft Local Plan is likely to have some positive effects as follows.
- 13. The Plan includes a number of policies specifically aiming to meet the housing needs of **older** and disabled people within Kirklees such as Policy DLP11: Housing Mix and Affordable Housing and Policy DLP25: Design. Other Local Plan policies refer to meeting the needs of disabled people in relation to transport and access, including DLP21: Highways and Access and DLP22: Parking. It is considered that the age and disability protected characteristics are addressed well through these policies in the Draft Local Plan.
- 14. The fact that the policies within the Plan provide protection for community facilities such as village halls (e.g. DLP49: Community Facilities and Services) should have a positive effect on the **pregnancy and maternity** protected characteristic in particular, as these locations can host meetings, classes and activities to provide support and reduce isolation for parents, especially outside of the main urban centres. Further positive effects are also possible in relation to

- **religion or belief** as the supporting text to the policy indicates that places of worship are included within community services.
- 15. The Draft Local Plan makes provision for meeting local needs for Traveller accommodation, through policy DLP12: Accommodation for Travellers and through the allocation of two Traveller sites in the District. The Local Plan is therefore considered to have a positive effect on **race**.
- 16. There are a large number of other policies in the Local Plan which, while they do not specifically refer to the protected characteristics of the Equality Act, will benefit all people including those covered by those characteristics. This includes, for example, environmental policies and policies relating to public transport provision, education and economic development.

Consultation on the Local Plan

17. As well as the content of the Local Plan, it is important that the protected characteristics of the Equalities Act are taken into consideration when preparing and consulting on the Plan, in particular ensuring that all groups of people have the opportunity to access and participate in consultations.

Table A6.1: Likely effects of the Draft Local Plan on the nine protected characteristics under the Equality Act 2010

Protected Characteristics	Likely Effect	Justification
Age	+	There are a number of policies in the Draft Local Plan which seek to ensure that the needs of older people are met, including:
		Policy DLP11: Housing Mix and Affordable Housing which requires all proposals for housing development to provide a mix of housing types. For schemes of more than 10 dwellings or those of 0.4ha or greater in size, the housing mix should include design elements that ensure buildings are suitable to meet the needs of people into later life.
		 Policy DLP25: Design which requires development proposals to ensure that the needs of a range of different users are met, including older people, to create accessible and inclusive places.
		 Policies DLP17: Huddersfield Town Centre and DLP18: Dewsbury Town Centre which both require proposals for town centre developments to provide a safe, welcoming, inclusive destination for the district's residents of all ages.
		Therefore, the Local Plan is considered to have an overall positive effect on 'age'.
Disability	+	The Draft Local Plan includes a number of policies specifically referring to the needs of disabled people and those requiring care, including:
		 Policy DLP11: Housing Mix and Affordable Housing which requires all proposals for housing development to consider provision for those with specialist needs. For schemes of more than 10 dwellings or those of 0.4ha or greater in size, the housing mix should include design elements that ensure buildings are suitable for those with a specialist need for accommodation.
		 Policy DLP21: Highways and Access which requires development proposals to ensure safe access from the highway network to the development site for disabled people.
		 Policy DLP22: Parking which states that provision will be made to accommodate the needs of disabled people for the parking of vehicles.
		 Policy DLP27: Design which requires development proposals to ensure that the needs of a range of different users are met, including disabled people.
		Therefore, the Local Plan is considered to have an overall positive effect on 'disability'.

Protected Characteristics	Likely Effect	Justification	
Gender reassignment	0	The Draft Local Plan does not include any direct or indirect references to gender reassignment and does not include policies or proposals that are considered to have a direct effect on this protected characteristic.	
Marriage and civil partnership	0	The Draft Local Plan does not include any direct or indirect references to marriage and civil partnership and does not include policies or proposals that are considered to have a direct effect on this protected characteristic.	
Pregnancy and maternity	+	There are policies in the Draft Local Plan that seek to provide and maintain community services and facilities within Kirklees. This could have a positive effect on the provision of services relevant to pregnancy and maternity, for example by retaining premises such as community halls that can be used for meetings, classes and activities, thereby providing support and reducing isolation for parents, particularly outside of the main urban areas. In particular:	
		 Policy DLP49: Community Facilities and Services requires community facilities to be provided in accessible locations and only permits proposals which would invo- the loss of valued community facilities provided that certain criteria are met (i.e. t facility is no longer required or it can be provided elsewhere). 	
		Therefore, the Local Plan is considered to have an overall positive effect on 'pregnancy and maternity'.	
Race	+	Policy DLP 12: Accommodation for Travellers states that the Local Plan will seek to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople by allocating land specifically for these purposes in the Local Plan and by permitting the development of sites in accordance with other Local Plan policies, in line with the specified criteria.	
		The Draft Local Plan (Allocations and Designations document) allocates two Traveller sites to meet the identified local need for Traveller accommodation.	
		Therefore, the Local Plan is considered to have an overall positive effect on 'race'.	
Religion or belief	+	Policies in the Draft Local Plan seek to provide and maintain community services and facilities within Kirklees, which includes places of worship. In particular:	
		Policy DLP49: Community Facilities and Services requires community facilities to be provided in accessible locations and only permits proposals which would involve the loss of valued community facilities provided that certain criteria are met (i.e. the	

Protected Characteristics	Likely Effect	Justification
		facility is no longer required or it can be provided elsewhere). The supporting text to the policy indicates that the services and facilities covered by the policy include places of worship.
		Therefore, an overall positive effect on 'religion or belief' is expected from the Local Plan.
Sex	0	The Draft Local Plan does not include any direct or indirect references to gender and does not include policies or proposals that are considered to have a direct effect on this protected characteristic.
Sexual orientation	0	The Draft Local Plan does not include any direct or indirect references to sexual orientation and does not include policies or proposals that are considered to have a direct effect on this protected characteristic.

Appendix 7

Health Impact Assessment

Kirklees Local Plan: Health Impact Assessment

- 1. This appendix presents the findings of an assessment of the likely effects of the Draft Kirklees Local Plan on health.
- 2. HIA seeks to measure the potential health impacts of a policy, programme or project on the wider population. The rationale of the assessment is to assess impacts on health and health inequalities in a systematic and transparent way. Ultimately the aims of the HIA are to reduce health inequalities, contribute to improved health and contribute to better decision making.
- 3. The HIA for the Draft Local Plan is being carried out in conjunction with the SA. The Local Plan as a whole is being subject to HIA rather than the policies being assessed on an individual basis. However, the HIA framework recognises that it is the individual policies that may need to be amended in order to help the Local Plan contribute towards reducing health inequalities.

Links to the Sustainability Appraisal

4. The SA assesses the impacts of the Local Plan through the use of 19 SA objectives that appraise social, environmental and economic impacts. Almost all of the SA objectives have links to the social determinants of health. As such the SA incorporates many aspects of the HIA. However, the Local Plan is being subject to a separate HIA so that specific health impacts can be identified.

Method

5. The approach that is being taken to the HIA of the Local Plan is consistent with the HIA work that was undertaken in relation to the now-withdrawn Kirklees Core Strategy. The same 'HIA framework' has been used with minor amendments made following the SA Scoping consultation and to remove out of date references to primary care trusts (see **Table A7.1** overleaf). Consideration has been given to whether the Draft Local Plan addresses the various decision-making questions and specific policies referred to as relevant.

Findings

6. As shown in **Table A7.1** overleaf, the Draft Local Plan addresses most of the decision-making questions in the HIA framework. While a small number are not addressed by the Local Plan, these are specific points which would not necessarily be expected to be addressed directly in Local Plan policies.

Table A7.1: Health Impact Assessment of the Draft Kirklees Local Plan

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
1. Housing	Overcrowding and sanitation Lack of affordable housing – low income residents spend high proportion of income on housing to detriment of lifestyle. Poor choice of location and bad design/ orientation can lead to physical and mental health conditions. Poor construction methods can have impacts on wellbeing. Poor match between housing stock and household needs.	 Code for Sustainable Homes Accessibility Adaptable / lifetime homes Good design and orientation including internal layout 	Promote adaptable/ lifetime homes?	In part. Policy DLP11: Housing Mix and Affordable Housing seeks to provide a mix of types, sizes and tenures of housing, including housing for older people; however there is no specific reference to adaptable/lifetime homes.
		 Housing mix (the type and tenure) Energy efficiency Affordable homes	Promote high quality / sustainable design of residential accommodation?	Yes. Policy DLP25: Design sets out detailed criteria for new development, including residential properties. It includes specific criteria seeking to ensure the sustainability of developments.
	Some houses may lack basic facilities to enable to preparation of healthy foods.	offices, shops and health facilities • The provision of land in the right places to fulfil housing need	Ensure residential developments are located close to basic services?	In part. Policy DLP2: Location of New Development states that most new development, including most housing development, will take place within the urban areas taking advantage of existing services and high levels of accessibility. Policy DLP49: Community Facilities and Services requires community facilities to be provided in accessible locations. The options for residential site allocations have been subject to SA which has included an assessment of their access to services and facilities, and in general the allocated residential sites are located close to basic services.
			Seek to provide a mix of types and tenures of housing?	Yes. Policy DLP11: Housing Mix and Affordable Housing seeks to provide a mix of types, sizes and tenures of housing. For schemes of more than 10 dwellings or those of

Influence	Impacts	Positive Effects of Planning	Decision Making Questions Does the plan	Assessment of the Draft Kirklees Local Plan
			Seek to provide sufficient affordable housing?	O.4ha or greater in size, the housing mix should specifically reflect the proportions of households that require housing and achieve a mix of house size, tenure and price. This should include design elements that ensure buildings are suitable for those with a specialist need for accommodation at present and to meet the needs of people into later life. Yes. Policy DLP11: Housing Mix and Affordable Housing requires affordable homes to be provided in developments of 10 or more units. The proportion of affordable homes should be at least 20% of the total units on market housing sites and a higher proportion will be encouraged.
2. Access to Public Services such as health centres, libraries and information centres and education facilities.	 Access to public services required to develop strong communities, can lead to greater community cohesion. Use of primary/ preventative healthcare dependent on accessibility. Services located far away can cause significant problems for the less mobile, including elderly, particularly lack of social interaction – potentially leading to isolation and depression. Access to effective and affordable Early Years Development Provision 	Take account of public service needs, location and accessibility Reconfiguration of health and social service provision Co-location of public services	Consider the needs, location and accessibility of public services?	Yes. Policy DLP50: Educational and Healthcare Needs requires new educational and healthcare facilities to be provided to meet the demand from new developments. Policy DLP49: Community Facilities and Services requires community facilities to be provided in accessible locations. Policy DLP2: Location of New Development directs most new development, including most housing, employment, retail and mixed use development, to the urban areas taking advantage of existing services and high levels of accessibility.

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
	is critical in reducing inequalities not just in educational attainment, but also in health.		Seek to facilitate multiple building uses for different public services?	No. This could be an inappropriate level of detail for the Local Plan.
			Seek to provide community facilities in conjunction with development?	In part. Policy DLP49: Community Facilities and Services requires community facilities to be provided in accessible locations and Policy DLP50: Educational and Healthcare Needs requires new educational and healthcare facilities to be provided to meet the demand from new developments.
3. Opportunities for Physical Activity	Low levels of physical activity are a main cause of obesity and a range of other significant health issues Green space facilitates opportunities for exercise Green spaces can help reduce depression for those in urban areas Physical activity in childhood perceived to be a significant determinant in adult behaviour – access to sport and play facilities important Isolated developments can lead to sedentary lifestyles and mental ill health Badly located facilities can lead to excessive use of cars and lack of physical activity	Facilitating walking and cycling Recreation opportunities distributed equally across communities Protecting / enhancing green space Locating housing and employment close to services / facilities Planning for extended schools	Make provision for a walking and cycling network and seek to prioritise walking and cycling?	Yes. Policy DLP24: Core Walking and Cycling Network seeks to safeguard the network of footpaths and cycle paths in order to provide opportunities to reduce the number of car journeys and to link settlements, employment sites and transport hubs. A number of policies in the Draft Local Plan refer to encouraging walking and cycling including DLP4: Masterplanning Sites which requires masterplans to reduce the need for car use and encourage sustainable modes of travel, including provision for cycle routes, footpaths and bridleways; DLP15: Residential in Town Centres Policy which encourages residential developments in town centres to incorporate cycle storage; and DLP19: Strategic

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
	Moderate physical activity can help against cognitive decline in older people			Transport Infrastructure which does not permit development proposals that would prejudice the development of walking and cycling infrastructure.
			Seek to enhance recreation and leisure facilities?	Yes. Policy DLP48: Healthy, Active and Safe Lifestyles seeks to facilitate access to a range of high quality, well maintained and accessible open spaces and play, sports, leisure and cultural facilities. DLP54: Sport and Physical Activity will protect, enhance and support new outdoor and indoor sport and leisure facilities and only permits their loss if certain criteria are met, i.e. the facility is no longer required.
			Protect and enhance existing green spaces and seek to create new ones?	Yes. Policies DLP63: Urban Green Space, DLP64: Local Green Space and DLP65: New Green Space provide for new open and green spaces in Kirklees and the protection of existing green spaces. The Allocations and Designations document allocates sites for urban green space and local green space.
			Ensure residential developments are located close to basic services?	Yes. Policy DLP2: Location of New Development states that most new development, including most housing development, will take place within the urban areas taking advantage of existing services and high levels of accessibility. Policy DLP49: Community Facilities and Services requires community facilities to be provided in accessible locations. The options for residential site allocations

Influence	Impacts	Positive Effects of Planning	Decision Making Questions Does the plan	Assessment of the Draft Kirklees Local Plan
				have been subject to SA which has included an assessment of their access to services and facilities.
			Seek to enhance the quantity and quality of open space provision?	Yes. Policies DLP63: Urban Green Space, DLP64: Local Green Space and DLP65: New Green Space provide for new open and green spaces in Kirklees and the protection of existing green spaces. The Allocations and Designations document allocates sites for urban green space and local green space.
4. Air quality, Noise, Neighbourhood Amenity and Natural Environment	Poor air quality can lead to increased incidence of lung and heart conditions and potentially asthma amongst children Living in proximity to busy roads is linked to negative health outcomes Absence of a good neighbour policy can mean residents and workers are subject to excessive noise and fumes Visually arid environments can undermine wellbeing and not facilitate physical activity The quality of the natural environment in general can contribute to well being in the same way as green spaces and amenity spaces.	Segregation of 'bad neighbour' uses Enhanced green space and green infrastructure Good quality amenity space incorporated into development Deter car use and restrict lorries to specific routes	Seek to minimise air and noise pollution?	Yes. Policy DLP51: Protection and Improvement of Local Air Quality specifically addresses this issue, requiring proposals that have the potential to increase local air pollution to be accompanied by evidence to show that the impact of the development has been assessed. Where the development introduces new receptors into Air Quality Management Areas or Areas of Concern or near other areas of relatively poor air quality the development must incorporate sustainable measures that protect the new receptors from unacceptable levels of air pollution. Where sustainable measures cannot be introduced which prevent receptors from being exposed to unsafe levels of air pollution the development will not be permitted. DLP52: Protection and Improvement of Environmental Quality requires development proposals which have

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	'
				the potential to increase noise pollution to be accompanied by evidence to show that the impacts have been evaluated and mitigated. The Local Plan also includes various policies relating to encouraging the use of sustainable transport and reducing car use which will protect
			Promote enhanced air	and improve air quality and reduce noise from traffic. Yes. DLP51: Protection and
			quality? (particularly through better green infrastructure)	Improvement of Local Air Quality specifically addresses this issue, although it does not refer to green infrastructure. Other policies in the Local Plan encourage increased walking and cycling through the protection and enhancement of the walking and cycle network, in particular DLP24: Core Walking and Cycling Network.
			Seek to provide high quality amenity space close to people's homes?	Yes. Policies DLP63: Urban Green Space, DLP64: Local Green Space and DLP65: New Green Space provide for new open and green spaces in Kirklees and the protection of existing green spaces. The Allocations and Designations document allocates sites for urban green space and local green space.
			Seek to minimise car use and / or road freight?	In part. DLP20: Sustainable Travel and Demand Management requires new development to be located in accordance with the spatial development strategy to ensure the need to travel is reduced and that essential travel needs can be met by

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
				forms of sustainable transport other than the private car. The policy also provides support for development proposals that can be served by alternative modes of transport. However, the Local Plan does not directly address freight, which is
			Segregate 'bad neighbour' uses?	addressed in the Local Transport Plan. In part. DLP25: Design requires developments to provide a high standard of amenity for future and neighbouring occupiers; including maintaining appropriate distances between buildings and the creation of development-free buffer zones between housing and employment uses incorporating means of screening where necessary.
			Seek to protect and enhance the natural environment?	Yes. The Local Plan includes a number of policies relating to protecting and enhancing the natural environment including DLP31: Biodiversity and Geodiversity, DLP33: Landscape, DLP34: Trees and DLP35: Conserving and Enhancing the Water Environment. In addition, criteria-based policies such as those relating to design and masterplanning address relevant issues within the policy criteria.
			Seek to protect open spaces that offer visual amenity?	Yes. Policies DLP63: Urban Green Space, DLP64: Local Green Space and DLP65: New Green Space provide for new open and green spaces in Kirklees and the protection of existing green spaces. The

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
				Allocations and Designations document allocates sites for urban green space and local green space.
5. Accessibility and Transport	access to facilities provides opportunities for greater social interaction • Easily accessible buildings and spaces encourages greater use by elderly / disabled • Reducing car dependency leads to more physical exercise • Poor access can disadvantage particularly community groups such as elderly, children. • Traffic congestion can lead to more hostile environments and reduce reliability of bus services, therefore decreasing walking. • Road traffic accidents are a major cause of	 Improved streetscape Improved choice of modes of transport by ensuring homes, jobs and services are well connected to each other and to existing transport corridors Making local facilities accessible by walking and cycling Promoting walking and cycling networks Traffic calming in residential areas Developing home zones can lead to greater community involvement and sense of ownership – increased community safety Requiring travel plans to support modal shift. 	Promote an enhanced streetscape?	Yes. DLP25: Design sets out criteria for all new development to ensure that it is of high quality appearance. DLP26: Advertisements and Shop Fronts sets out criteria for shop fronts, signs and advertisements, seeking to ensure that they are appropriate in terms of design and materials, for example respecting the character of the area and any historic features.
			Seek to enhance public transport provision?	Yes. DLP4: Masterplanning Sites requires masterplans to reduce the need for car use and encourage sustainable modes of travel, including provision for public transport, cycle routes, footpaths and bridleways. DLP21: Strategic Transport Infrastructure provides support for public transport improvement schemes.
	injury and fatality in young people and perceived danger from roads places restrictions on children's independent mobility.	Managing car parking effectively to deter commuting by car.	Ensure residential developments are located close to basic services?	Yes. Policy DLP2: Location of New Development states that most new development, including most housing development, will take place within the urban areas taking advantage of existing services and high levels of accessibility. Policy DLP49: Community Facilities and Services requires community facilities to be provided in accessible locations. The options for residential site allocations have been subject to SA which has included an assessment of their

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
				access to services and facilities.
			Make provision for a walking and cycling network and seek to prioritise walking and cycling?	Yes. Policy DLP24: Core Walking and Cycling Network seeks to safeguard the network of footpaths and cycle paths in order to provide opportunities to reduce the number of car journeys and to link settlements, employment sites and transport hubs. A number of policies in the Draft Local Plan refer to encouraging walking and cycling including DLP4: Masterplanning Sites which requires masterplans to reduce the need for car use and encourage sustainable modes of travel, including provision for cycle routes, footpaths and bridleways; DLP15: Residential in Town Centres Policy which encourages residential developments in town centres to incorporate cycle storage; and DLP19: Strategic Transport Infrastructure which does not permit development proposals that would prejudice the development of walking and cycling infrastructure.
			Promote home zone and traffic calming measures in residential areas?	No. The Local Plan includes references to highway safety and meeting the needs of pedestrians and cyclists but does not directly address traffic calming in residential areas.
6. Crime reduction and community safety	Environment (street design, unfriendly environments) can increase 'fear of crime' and be detrimental to wellbeing	 Layout of spaces to ensure natural surveillance Designing places to enhance opportunities for 	Contain urban design policies that seek to 'design out crime'?	Yes. DLP25: Design requires proposals to ensure that the risk of crime is minimised by enhanced security, and the promotion of well-

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
	 Where a pedestrian environment is intimidating people use cars and social interaction is reduced – increasing potential for crime Poorly designed green space and lack of investment in green space can potentially increase crime and antisocial behaviour Lack of trust in services can increase the fear of crime. 	social interaction • Improved lighting in public spaces • Designing out crime		defined routes, overlooked streets and places, high levels of activity, and well-designed security features.
7. Access to Healthy Food	 People on low incomes less able to eat well Food production co-op schemes can increase wellbeing, levels of physical activity and social interaction Centralisation of food shopping facilities can reduce variety locally and exacerbate social inequity A concentration of fast food outlets, particularly in areas close to schools, could potentially increase consumption of unhealthy foods. 	Safeguarding areas for community food growing projects Diversity of food shopping facilities including access to affordable healthy food and avoiding an over concentration of fast food outlets. Reduced reliance on large supermarkets Retention / enhancement / provision of allotments Development of farmers markets	Make provision for spaces where community can grow their own food? Seek to enhance convenience goods retail if there is a shortfall?	In part. DLP48: Healthy, Active and Safe Lifestyles supports initiatives which enable or improve access to healthy food, for example land for local food growing or allotments. However, provision is not made directly through the Local Plan. In part. Policy DLP14: Shopping Frontages seeks to focus retail units in the defined shopping areas and DLP15: Town Centre Uses states that town centres should provide for the food shopping needs of residents across Kirklees mainly in the convenience goods sector. However, the Local Plan does not directly address the provision of convenience goods retail.
		Seek to avoid an over concentration of fast food outlets?	In part. DLP16: Food and Drink Uses and the Evening Economy seeks to prevent concentrations of food and drink and licensed entertainment uses in a particular centre or part of a centre, where they would result in harm to the character, function, vitality and viability of the centre. However, this policy does not	

Influence	Impacts	Positive Effects of Planning	Decision Making Questions Does the plan	Assessment of the Draft Kirklees Local Plan
				relate specifically to fast food only.
			Protect / enhance the provision of allotments?	Yes. DLP48: Healthy, Active and Safe Lifestyles supports initiatives which enable or improve access to healthy food, for example land for local food growing or allotments. Some of the allocated open space sites are to be used for allotments.
			Maintain / enhance the vitality and viability of town and local centres?	Yes. DLP13: Town Centre Uses and DLP14: Shopping Frontages seek to direct town centre uses and retail uses to the identified centres and restrict development in out of town locations.
8. Access to work and impact of unemployment and low incomes	 Job security and job variety leads to increased health and wellbeing Income is a strong indicator of health Job satisfaction links to increased contribution to social networks Correlation between unemployment and heightened health risks Employment opportunities in inaccessible locations can affect health and wellbeing Low income leads people to refrain from purchasing goods / services that would improve health Low income minimises participation in social life 	 Allocating appropriate accessible sites Encouraging diversity in employment Local job retention through local labour agreements Promoting access to work via walking and cycling Availability of support services – such as childcare – but other town centre uses- shops and services Provision of facilities / activities for people on low / limited incomes 	Seek to provide a range of jobs close to where people live, in accessible locations, particularly the most deprived communities?	Yes. DLP2: Location of New Development states that most new development, including most employment, retail and mixed use development, will take place within the urban areas taking advantage of existing services and high levels of accessibility. DLP9: Safeguarding Employment Land and Premises protects employment land in the Priority Employment Areas which have been defined in part on the basis of their accessibility. Options for employment site allocations have been subject to SA which has included an assessment of their accessibility and the SA findings have informed the Council's decision making about which sites to allocate for employment uses.
			Promote the use of local labour agreements?	No.

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
			Ensure employment sites are located close to basic services?	In part. DLP2: Location of New Development states that most new development, including most employment, retail and mixed use development, will take place within the urban areas taking advantage of existing services and high levels of accessibility.
			Seek to raise the profile of the district to encourage investment?	Yes. Improvements to the attractiveness of the District are made through DLP19: Strategic Transport Infrastructure and the policies relating to green infrastructure provision, particularly DLP32: Strategic Green Infrastructure .
9. Social Cohesion and Social Capital	 Fragmentation of social structure can lead to ghettos – contributing to isolation and insecurity Material deprivation but also social and psychological problems of living in poverty Dispersal of residential communities and roads serving as barriers Loss of community facilities such as healthcare, education and meeting places. Indirect impacts on income arising from spatial planning such as access to employment. 	Mixed use developments in town centres Safe and permeable environments with natural social foci Providing diverse employment opportunities Involvement of the voluntary sector in the planning process	Seek to provide a mix of types and tenures of housing in all communities, where possible?	Yes. Policy DLP11: Housing Mix and Affordable Housing seeks to provide a mix of types, sizes and tenures of housing. For schemes of more than 10 dwellings or those of 0.4ha or greater in size, the housing mix should specifically reflect the proportions of households that require housing and achieve a mix of house size, tenure and price. This should include design elements that ensure buildings are suitable for those with a specialist need for accommodation at present and to meet the needs of people into later life.

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
	 Risks associated with negative perceptions of the planning process as people may feel they've lost out. Perceptions of racial discrimination contribute to mental ill health in BAME communities Improved social networks and social support can improve mental wellbeing. 		Ensure residential developments are located close to basic services, meeting places and employment opportunities?	DLP2: Location of New Development states that most new development, including most residential and mixed use development, will take place within the urban areas taking advantage of existing services and high levels of accessibility. Options for residential site allocations have been subject to SA which has involved assessing the access to services, facilities and employment nodes and the SA findings have informed the Council's decision making regarding which site to allocate for housing in the Local Plan.
			Seek to provide high quality amenity space close to people's homes?	Yes. Policies DLP63: Urban Green Space, DLP64: Local Green Space and DLP65: New Green Space provide for new open and green spaces in Kirklees and the protection of existing green spaces. The Allocations and Designations document allocates sites for urban green space and local green space.
			Seek to provide community facilities in conjunction with development?	In part. Policy DLP49: Community Facilities and Services requires community facilities to be provided in accessible locations and Policy DLP50: Educational and

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
				Healthcare Needs requires new educational and healthcare facilities to be provided to meet the demand from new developments.
10. Resource minimisation	 Reducing and minimising waste can improve environmental quality and improve human health Disposal of hazardous waste can have significant health impacts Maximising natural light can have a therapeutic / calming effect 	 Impose standards on hazardous waste disposal and waste linked to development Redevelopment of brownfield sites – recycling land Improved building design by meeting BREEAM (environmental assessment of buildings) and CEEQUAL (a civil engineering sustainable design award scheme) construction standards. 	Encourage the redevelopment of brownfield land?	In part. DLP6: Efficient and Effective use of Land and Buildings states that development proposals should give priority to the efficient use of previously developed land and buildings in the most sustainable locations and should bring empty properties back into use. The options for site allocations have been subject to SA including an assessment of whether they would involve the use of brownfield sites and the SA findings have been taken into account by the Council in decision making; however many of the sites included in the Allocations and Designations document are still on greenfield land.
			Promote building designs which seek to minimise resources?	Yes. Policy DLP44: Waste Management Hierarchy states that the Council will encourage and support the minimisation of waste production, and the re-use and recovery of waste materials including, for example, recycling, composting and Energy from Waste recovery. DLP25: Design encourages development proposals to use reclaimed and recycled materials and requires them to incorporate facilities for separating and storing waste for recycling and recovery. Yes. DLP25: Design requires development proposals to minimise resource use in the building by

Influence	Impacts	Positive Effects of Planning	Decision Making Questions	Assessment of the Draft Kirklees Local Plan
			Does the plan	
				utilising passive solar design, incorporating vegetation and tree planting to assist heating and cooling and providing for the use of renewable energy.
h • tt	Extreme weather events can affect health Anxiety arising from vulnerability to flooding Physical health risks from flooding, with threat of sewers flooding, etc.	Impact on energy use through building design, transportation etc. Avoid inappropriate development in areas at risk of flooding in accordance with the sequential and exception tests including flood resilient development where applicable.	Promote the use of renewable energy? Promote sustainable drainage systems?	Yes. DLP27: Renewable and Low Carbon Energy supports proposals for renewable and low carbon energy developments where certain criteria are met. Support is also given to the use of district heating networks. DLP4: Masterplanning Sites requires masterplans to assess the potential for energy efficient design including renewable energy schemes, and DLP25: Design requires development proposals to provide for the use of renewable energy. Yes. DLP29: Drainage sets out a presumption that SuDS will be used
			drainage systems?	within development sites to achieve specified runoff rates. DLP21: Highways and Access requires proposals to take into account surface water flooding and SuDS.
			Seek to minimise flood risk impacts of new development?	Yes. DLP28: Flood Risk requires development proposals to be subject to a Flood Risk Assessment in line with national policy, and to not increase flood risk elsewhere, where possible reducing it. DLP29: Drainage sets out a presumption that SuDS will be used within development sites to achieve specified runoff rates.
			Seek to avoid inappropriate development in areas at risk of flooding?	Yes. DLP28: Flood Risk directs development to areas at lower risk of flooding, following a sequential, risk-

Influence	Impacts	Positive Effects of Planning	Decision Making Questions Does the plan	Assessment of the Draft Kirklees Local Plan
12. Fuel Poverty	Cold housing is a health risk and contributes to extra deaths in winter	Sustainable design	Promote building designs which seek to minimise resources?	based approach. All of the options for development site allocations have been subject to SA, including an assessment of their likely effects on flood risk and the SA findings have informed the Council's decision making about which sites to allocate. Yes. DLP25: Design requires development proposals to minimise resource use in the building by utilising passive solar design, incorporating vegetation and tree planting to assist heating and cooling and providing for the use of renewable energy.