

# CALDERDALE LOCAL PLAN

## SUSTAINABILITY APPRAISAL UPDATE – ADDITIONAL HOUSING SUPPLY

Calderdale Metropolitan Borough Council  
December 2019



## **CALDERDALE LOCAL PLAN SUSTAINABILITY APPRAISAL:**

UPDATE DECEMBER 2019 – ADDITIONAL HOUSING SUPPLY

### **Purpose of the document**

1.1 This document provides an addendum to the previously released Sustainability Appraisal (SA) of the Publication Draft Calderdale Local Plan (released in 2018). The purpose of the SA is to inform the plan preparation process by appraising the various options the Council have considered to meet its additional housing requirement in relation to their sustainability, establishing their likely impacts, cumulative impacts, and the scope for mitigating any possible negative impacts.

1.2 In relation to housing requirement, four distinct options have been considered by the Council:

**Option 1)** Maintain the housing requirement at 840dpa and reduce expected economic growth to below the existing baseline figure (6,441 additional jobs);

**Option 2)** Increase the housing requirement to 910dpa and reduce expected economic growth to the baseline figure (7,791 additional jobs);

**Option 3)** Increase the housing requirement to 1,040dpa and maintain expected economic growth at the current policy-on plus transport level (10,318 additional jobs).

**Option 4)** Increase the housing requirement to (on average) 997dpa which supports the 'policy-on with transport' economic growth aspirations and also takes into account the uncertainty in assumptions built into the forecasting model.

1.3 The Council's preferred approach is that outlined in option 4. This report contains the Sustainability Appraisals for the above options along with an appraisal of the approach to **supply** required to facilitate 997dpa. For site specific Sustainability Appraisal assessments, please refer to **Appendix 1**.

**Option 1: Maintain the housing requirement at 840 dpa and reduce expected economic growth to below the existing baseline figure (6,441 additional jobs);**

SA Objective	Impacts
SA 1. To Ensure Quality housing is available to everyone	Overall a positive impact against this objective is recorded as the option sets out the net number of new homes that is required within the Borough during the lifetime of the Local Plan in order to meet housing need. However it would deliver the least housing and also result in a substantial shortfall of 721 units on affordable housing requirements.
SA 2. To Improve Safety and security for people and property	N/A
SA3. To create and retain healthy , vibrant and inclusive communities	Through meeting the option’s housing need the option is supporting this SA Objective, in reducing social exclusion for example. However it will result in the least number of affordable housing delivered compared to the other options.
SA 4. To encourage increased participation in cultural, leisure and recreation activities.	N/A
SA 5. To improve accessibility to essential services, facilities and employment	Overall the impact is uncertain, as whilst the provision of new homes would have a positive impact on the Objective, it would inevitably lead to an increased demand on existing services. The actual impact however on access to services will be dependent on the location of developments, which is addressed through the Infrastructure Delivery Plan and through other Local Plan policies.
SA 6. To retain, protect and create a quality, locally distinctive built and historic environment?	The impact on this SA Objective is uncertain as the additional development will have an impact on the Borough's built and historic environment. If development takes place that does not respect the local built environment, there could be a negative impact, whilst alternatively development could enhance derelict and degraded sites. As with a number of other objectives, the impacts are significantly dependent on the location and design of developments, which are addressed through other policies in the Local Plan.

SA Objective	Impacts
SA 7. To reduce the risk of flooding and resulting detrimental effects on people and property?	The impact is uncertain, as although new development is likely to increase run-off rates, there are opportunities through the water management and flood risk policies to secure sustainable urban drainage systems.
SA 8. To reduce the effect of traffic on the environment?	Again the impact is uncertain in relation to this Objective, although the new development will have a negative impact on the levels of traffic in the Borough, the extent to which this has a negative impact will be determined by the location of development which is addressed through other Local Plan policies.
SA 9. To protect and enhance biodiversity and geodiversity.	<p>The overall impact against the SA Objective is uncertain as in meeting the housing requirement there will be a requirement for greenfield land to be developed which will have negative impacts on biodiversity. However as the policy does not determine the allocation of sites it is unclear as to the level of impact this would have on international, national and locally designated sites.</p> <p>The site specific mitigation measures and local plan policies relating to the natural environment will require a net biodiversity gain. This would be a positive impact against this objective.</p>
SA10. To reduce pollution levels and CO2 emissions to target levels.	Again the impact recorded against this Objective is uncertain, as whilst the new development will have a negative impact on the levels of traffic in the Borough, there is likely to be a positive impact against the element concerned with the energy efficiency of buildings (as new build will be required to meet certain energy efficiency requirements). The impact that the level of proposed development will have on the elements of the objective concerned with renewable / low carbon use and generation, air quality, and water quality is uncertain and is addressed through other Local Plan policies.
SA11. To protect and enhance the natural, semi natural and manmade landscape.	Overall the impact is uncertain: in meeting the housing need for the Borough there will be an impact on the landscape, however the Local Plan will include design policies which will be required to address the impact on the area.
SA12. To ensure prudent and efficient use of natural resources and energy.	Overall the impact is uncertain as whilst new development will be required to meet certain energy efficiency levels, development of the scale

SA Objective	Impacts
	proposed is likely to have a negative impact on the elements of the objective related to water consumption and reducing the use of primary aggregates.
SA13. To ensure efficient use of land?	As a result of the scale of the development proposed, there would be a positive impact against this SA Objective. This is because it would have a positive impact in relation to the use of previously developed land, high density mixed use developments, and in reducing the amount of derelict and degraded land. A further positive impact concerns the element of the Objective relating to bringing disused buildings and or spaces back into use.
SA14.To reduce the amount of waste produced.	Overall the impact is uncertain as all options would increase the consumption of materials and resources, although the Local Plan includes policies to manage waste sustainably.
SA15. To provide good employment opportunities for all.	Overall there is a positive impact as the option aims to meet the local housing need, which is a significant factor in attracting and retaining a skilled workforce. However this option would result in additional in-commuting if economic ambition is not reduced. In addition if existing in-commuting patterns are maintained, this option would undermine economic growth and efforts to reduce economic inequality.
SA16. To achieve business success, sustainable economic growth, and continued investment.	Should this option be pursued, if existing in-commuting patterns are maintained this would undermine economic growth and efforts to reduce economic inequality. In addition, the housing growth and employment growth aspirations would not support Leeds City Region objectives to increase productivity relative to other regions.
SA17. Enhance the viability and vitality of the town centres.	Any increase in housing and therefore population throughout the throughout the Borough will help support the town centres and therefore the options is considered to have a positive impact against this Objective.

**Option 2 Increase the housing requirement to 910 dpa and reduce expected economic growth to the baseline figure (7,791 additional jobs);**

SA Objective	Impacts
SA 1. To Ensure Quality housing is available to everyone	The option would have a positive impact against this objective; it would help deliver an increased housing requirement compared to option 1, and would also help deliver additional affordable homes in comparison, although the option would still result in an undersupply.
SA 2. To Improve Safety and security for people and property	N/A
SA3. To create and retain healthy , vibrant and inclusive communities	Through meeting the option’s housing figure the option is supporting this SA Objective, in reducing social exclusion for example. However it will still result in a shortfall of affordable homes compared to option 3.
SA 4. To encourage increased participation in cultural, leisure and recreation activities.	N/A
SA 5. To improve accessibility to essential services, facilities and employment	Overall the impact is uncertain, as whilst the provision of new homes would have a positive impact on the Objective, it would inevitably lead to an increased demand on existing services. The actual impact however on access to services will be dependent on the location of developments, which is addressed through the Infrastructure Delivery Plan and through other Local Plan policies.
SA 6. To retain, protect and create a quality, locally distinctive built	The impact on this SA Objective is uncertain as the additional development

<p><b>and historic environment?</b></p>	<p>will have an impact on the Borough's built and historic environment. If development takes place that does not respect the local built environment, there could be a negative impact, whilst alternatively development could enhance derelict and degraded sites.</p> <p>As with a number of other objectives, the impacts are significantly dependent on the location and design of developments, which are addressed through other policies in the Local Plan.</p>
<p><b>SA 7. To reduce the risk of flooding and resulting detrimental effects on people and property?</b></p>	<p>The impact is uncertain, as although new development is likely to increase run-off rates, there are opportunities through the water management and flood risk policies to secure sustainable urban drainage systems.</p>
<p><b>SA 8. To reduce the effect of traffic on the environment?</b></p>	<p>Again the impact is uncertain in relation to this Objective, although the new development will have a negative impact on the levels of traffic in the Borough, the extent to which this has a negative impact will be determined by the location of development which is addressed through other Local Plan policies. This option would enable less potential for investment in sustainable transport in comparison to options 3 and 4, there would however be a greater traffic impact than option 1.</p>
<p><b>SA 9. To protect and enhance biodiversity and geodiversity.</b></p>	<p>The overall impact against the SA Objective is uncertain as in meeting the housing requirement there will be a requirement for greenfield land to be developed which will have negative impacts on biodiversity. However as the option does not determine the allocation of sites it is unclear as to the level of impact this would have on international, national and locally designated sites. Such impacts are addressed through other Local Plan policies and the SA of these, although this option would result in a greater impact on the countryside than option 1.</p>

	<p>The site specific mitigation measures and local plan policies relating to the natural environment will require a net biodiversity gain. This would be a positive impact against this objective.</p>
<p><b>SA10. To reduce pollution levels and CO2 emissions to target levels.</b></p>	<p>Again the impact recorded against this Objective is uncertain, as whilst the new development will have a negative impact on the levels of traffic in the Borough, there is likely to be a positive impact against the element concerned with the energy efficiency of buildings (as new build will be required to meet certain energy efficiency requirements). The impact that the level of proposed development will have on the elements of the objective concerned with renewable / low carbon use and generation, air quality, and water quality is uncertain and is addressed through other Local Plan policies. This option would lead to a potentially greater traffic impact than option 1 and there would be less potential for investment in sustainable transport compared to options 3 and 4.</p>
<p><b>SA11. To protect and enhance the natural, semi natural and manmade landscape.</b></p>	<p>Overall the impact is uncertain: this option would result in a greater level of land being removed from the Green Belt and encroaching on the countryside and subsequently there will be an impact on the landscape, however the Local Plan will include design policies which will be required to address the impact on the area.</p>
<p><b>SA12. To ensure prudent and efficient use of natural resources and energy.</b></p>	<p>Overall the impact is uncertain as whilst new development will be required to meet certain energy efficiency levels, development of the scale proposed is likely to have a negative impact on the elements of the objective related to water consumption and reducing the use of primary aggregates.</p>
<p><b>SA13. To ensure efficient use of land?</b></p>	<p>As a result of the scale of the development proposed, there would be a positive impact against this SA Objective. This is because it would have a</p>

	<p>positive impact in relation to the use of previously developed land, high density mixed use developments, and in reducing the amount of derelict and degraded land. A further positive impact concerns the element of the objective relating to bringing disused buildings and or spaces back into use.</p>
<p><b>SA14. To reduce the amount of waste produced.</b></p>	<p>Overall the impact is uncertain as all options would increase the consumption of materials and resources, although the Local Plan includes policies to manage waste sustainably.</p>
<p><b>SA15. To provide good employment opportunities for all.</b></p>	<p>Overall there is a positive impact as the option aims to meet the local housing need, which is a significant factor in attracting and retaining a skilled workforce. However this option would result in additional in-commuting if economic ambition is not reduced. In addition if existing in-commuting patterns are maintained, this option would undermine economic growth and efforts to reduce economic inequality.</p>
<p><b>SA16. To achieve business success, sustainable economic growth, and continued investment.</b></p>	<p>As with option 1, should this option be pursued and if existing in-commuting patterns are maintained this would undermine economic growth and efforts to reduce economic inequality. In addition, the housing growth and employment growth aspirations would not support Leeds City Region objectives to increase productivity relative to other regions.</p>
<p><b>SA17. Enhance the viability and vitality of the town centres.</b></p>	<p>Any increase in housing and employment growth and therefore population throughout the Borough will help support the town centres and therefore the options is considered to have a positive impact against this Objective.</p>

**Option 3 - Increase the housing requirement to 1,040 dpa and maintain expected economic growth at the current policy-on plus transport level (10,318 additional jobs).**

SA Objective	Impacts
SA 1. To Ensure Quality housing is available to everyone	This option would have a positive impact against the SA Objective. It would deliver the full housing requirement and has the potential to deliver the required affordable housing figure through site allocations. Therefore in relation to this objective the option would have the strongest positive impact against the SA Objective.
SA 2. To Improve Safety and security for people and property	N/A
SA3. To create and retain healthy , vibrant and inclusive communities	This option would result in the strongest positive impact against the SA objective when compared to the other options. This is due to the increased level of affordable housing delivery, which would help reduce social exclusion , by helping to secure a higher proportion of the borough’s population with the right type and tenure of housing.
SA 4. To encourage increased participation in cultural, leisure and recreation activities.	N/A
SA 5. To improve accessibility to essential services, facilities and employment	Overall the impact is uncertain, as whilst the provision of new homes would have a positive impact on the Objective, it would inevitably lead to an increased demand on existing services. The actual impact however on access to services will be dependent on the location of developments, which is addressed through the Infrastructure Delivery Plan and through other Local Plan policies. This option would however mitigate the potential negative elements by supporting economic growth and investment in

	transport.
<b>SA 6. To retain, protect and create a quality, locally distinctive built and historic environment?</b>	<p>The impact on this SA Objective is uncertain as the additional development will have an impact on the Borough's built and historic environment. If development takes place that does not respect the local built environment, there could be a negative impact, whilst alternatively development could enhance derelict and degraded sites.</p> <p>As with a number of other objectives, the impacts are significantly dependent on the location and design of developments, which are addressed through other policies in the Local Plan.</p>
<b>SA 7. To reduce the risk of flooding and resulting detrimental effects on people and property?</b>	The impact is uncertain, as although new development is likely to increase run-off rates, there are opportunities through the water management and flood risk policies to secure sustainable urban drainage systems.
<b>SA 8. To reduce the effect of traffic on the environment?</b>	Option 3 would have the potential to result in the greatest traffic impact, but overall the impact is uncertain in relation to this Objective. The option would also maintain existing commuting patterns. The extent to which this option has a negative impact will be determined by the location of development which is addressed through other Local Plan policies. Furthermore, a positive element resulting from this option would be the level of growth would support a greater investment in transport.
<b>SA 9. To protect and enhance biodiversity and geodiversity.</b>	The overall impact against the SA Objective is uncertain as in meeting the housing and employment growth requirement there will be a requirement for greenfield land to be developed which will have negative impacts on

	<p>biodiversity. However the level of impact this would have on international, national and locally designated sites is addressed through the SA of other local plan policies and the HRA.</p> <p>The site specific mitigation measures and local plan policies relating to the natural environment will require a net biodiversity gain. This would be a positive impact against this objective.</p>
<p><b>SA10. To reduce pollution levels and CO2 emissions to target levels.</b></p>	<p>The impact recorded against this Objective is uncertain. Whilst the new development will have a negative impact on the levels of traffic in the Borough, the levels of growth proposed against option 3 would support greater levels of investment in transport compared to options 1 and 2 and would therefore mitigate the potential negative impacts through reducing congestion etc.</p> <p>There is likely to be a positive impact against the element concerned with the energy efficiency of buildings (as new build will required to meet certain energy efficiency requirements). The impact that the level of proposed development will have on the elements of the objective concerned with renewable / low carbon use and generation, air quality, and water quality is uncertain and is addressed through the SA of the relevant Local Plan policies.</p>
<p><b>SA11. To protect and enhance the natural, semi natural and manmade landscape.</b></p>	<p>Overall the impact is uncertain: this option would result in the greatest impact on the Green Belt and encroaching on the countryside and subsequently there will be an impact on the landscape, however the Local Plan will include design policies which will be required to address the impact on the area.</p>

<p><b>SA12. To ensure prudent and efficient use of natural resources and energy.</b></p>	<p>Overall the impact is uncertain as whilst new development will be required to meet certain energy efficiency levels, development of the scale proposed is likely to have a negative impact on the elements of the objective related to water consumption and reducing the use of primary aggregates.</p>
<p><b>SA13. To ensure efficient use of land?</b></p>	<p>As a result of the scale of the development proposed, there would be a positive impact against this SA Objective. This is because it would have a positive impact in relation to the use of previously developed land, high density mixed use developments, and in reducing the amount of derelict and degraded land. A further positive impact concerns the element of the Objective relating to bringing disused buildings and or spaces back into use.</p>
<p><b>SA14. To reduce the amount of waste produced.</b></p>	<p>Overall the impact is uncertain as all options would increase the consumption of materials and resources, although the Local Plan includes policies to manage waste sustainably.</p>
<p><b>SA15. To provide good employment opportunities for all.</b></p>	<p>Overall there is a positive impact as the option aims to meet the local housing need, which is a significant factor in attracting and retaining a skilled workforce. In addition the option would have the strongest positive impact in relation to supporting economic growth and therefore the creation of jobs, which would reduce economic inequality and poverty. In addition, this option would maintain existing commuting patterns.</p>
<p><b>SA16. To achieve business success, sustainable economic growth, and continued investment.</b></p>	<p>Option 3 would have the strongest positive impact in relation to this SA objective by supporting the highest level of economic growth compared to the other options. The option would maintain existing commuting patterns.</p>

**SA17. Enhance the viability and vitality of the town centres.**

**Any increase in housing and employment growth and therefore population throughout the Borough will help support the town centres and therefore the options is considered to have a positive impact against this Objective.**

**Option 4 - Increase the housing requirement to (on average) 997 dpa which supports the 'policy-on with transport' economic growth aspirations and also takes into account the uncertainty in assumptions built into the forecasting model.**

SA Objective	Impacts
SA 1. To Ensure Quality housing is available to everyone	The approach would have a positive impact against this SA objective. It would deliver the housing requirement and would leave only a very minimal affordable housing shortfall (on allocations alone). The approach would increase opportunity for people from all social groups to live in good quality housing. The overall impact in relation to this objective would be positive. (Positive)
SA 2. To Improve Safety and security for people and property	N/A
SA3. To create and retain healthy , vibrant and inclusive communities	This approach would result in a strong positive impact against the SA objective. This is largely due to an increased level of affordable housing delivery compared to options 1 and 2, which would help to reduce social exclusion by helping to secure a higher proportion of the borough's population with the right type and tenure of housing. (Positive)
SA 4. To encourage increased participation in cultural, leisure and recreation activities.	N/A
SA 5. To improve accessibility to essential services, facilities and employment	Overall the impact is uncertain, as whilst the provision of new homes would have a positive impact on the Objective, it would inevitably lead to an increased demand on existing services. The actual impact however on access to services will be dependent on the Infrastructure Delivery Plan and the implementation of Local Plan policies. This approach would however allow for the mitigation of the potential negative elements by supporting economic growth and investment in transport. (Uncertain)
SA 6. To retain, protect and create a quality, locally distinctive built	The impact on this SA objective is uncertain as the additional development

SA Objective	Impacts
and historic environment?	<p>will have an impact on the Borough's built and historic environment. If development takes place that does not respect the local built environment, there could be a negative impact, whilst alternatively development could enhance derelict and degraded sites.</p> <p>As with a number of other objectives, the impacts are significantly dependent on the design of developments, and the implementation of Local Plan policy on the built and historic environment.</p> <p>(Uncertain)</p>
SA 7. To reduce the risk of flooding and resulting detrimental effects on people and property?	<p>The impact is uncertain, as although new development is likely to increase run-off rates, there are opportunities through the water management and flood risk policies to secure sustainable urban drainage systems.</p> <p>(Uncertain)</p>
SA 8. To reduce the effect of traffic on the environment?	<p>The impact is uncertain in relation to this objective, although the new development will have a negative impact on the levels of traffic in the Borough; the extent to which this has a negative impact will be determined by the implementation of Local Plan transport policies and site specific mitigation measures. A positive element resulting from this approach would be the potential investment in transport infrastructure.</p> <p>(Uncertain)</p>
SA 9. To protect and enhance biodiversity and geodiversity.	<p>The overall impact against the SA Objective is uncertain as in meeting the housing requirement there is a requirement for greenfield land to be developed which will have negative impacts on biodiversity. However, the sites have been assessed in terms of their impact on international, national and locally designated sites and measures proposed to mitigate any impact where necessary.</p> <p>The site specific mitigation measures and local plan policies relating to the natural environment will require a net biodiversity gain. This would be a positive impact against this objective</p>

SA Objective	Impacts
	(Uncertain)
<p><b>SA10. To reduce pollution levels and CO2 emissions to target levels.</b></p>	<p>The impact recorded against this Objective is uncertain, as whilst the new development will have a negative impact on the levels of traffic in the Borough, there is likely to be a positive impact against the element concerned with the energy efficiency of buildings (as new build will be required to meet certain energy efficiency requirements). The impact that the level of proposed development will have on the elements of the objective concerned with renewable / low carbon use and generation, air quality, and water quality is uncertain and is addressed through other Local Plan policies. (Uncertain)</p>
<p><b>SA11. To protect and enhance the natural, semi natural and manmade landscape.</b></p>	<p>Overall the impact is uncertain as whilst new development will have an impact on the Green Belt and the landscape, the Local Plan will contain policies which will ensure any impact is minimised and considered carefully in the determination of applications. Furthermore, site specific mitigation measures and local plan policies relating to the natural environment will require a net biodiversity gain. (Uncertain)</p>
<p><b>SA12. To ensure prudent and efficient use of natural resources and energy.</b></p>	<p>Overall the impact is uncertain as whilst new development will be required to meet certain energy efficiency levels, development of the scale proposed is likely to have a negative impact on the elements of the objective related to water consumption and reducing the use of primary aggregates. (Uncertain)</p>
<p><b>SA13. To ensure efficient use of land?</b></p>	<p>On a whole, there would be a positive impact against this SA objective, due to the priority given, through the sequential approach, to the use of previously developed land. There would also be a positive impact in</p>

SA Objective	Impacts
	<p>relation to the use of high-density mixed use developments and in reducing the amount of derelict and degraded land. (Positive)</p>
<p><b>SA14. To reduce the amount of waste produced.</b></p>	<p>Overall the impact is uncertain as the approach would increase the consumption of materials and resources, although the Local Plan includes policies to manage waste sustainably. (Uncertain)</p>
<p><b>SA15. To provide good employment opportunities for all.</b></p>	<p>Overall there is a positive impact as the approach aims to meet the local housing need, which is a significant factor in attracting and retaining a skilled workforce. In addition the approach would have a strong positive impact in relation to supporting economic growth and therefore the creation of jobs, which would reduce economic inequality and poverty. This approach would maintain existing commuting patterns. (Positive)</p>
<p><b>SA16. To achieve business success, sustainable economic growth, and continued investment.</b></p>	<p>This would have a strong positive impact in relation to this SA objective by supporting a high level of economic growth. The approach would maintain existing commuting patterns. There is likely to be a positive impact against the element concerned with energy efficiency, as new employment premises will be required to meet certain energy efficiency requirements. (Positive)</p>
<p><b>SA17. Enhance the viability and vitality of the town centres.</b></p>	<p>The approach to housing delivery in the Borough will help support the existing retailers in the town centres and potentially attract new retailers. Overall there would be a positive impact against this SA objective. (Positive)</p>

**Supply - Increase the housing requirement to (on average) 997 dpa which supports the ‘policy-on with transport’ economic growth aspirations and also takes into account the uncertainty in assumptions built into the forecasting model.**

SA Objective	Impacts
SA 1. To Ensure Quality housing is available to everyone	Overall a positive impact against this objective is recorded as the approach involves the supply of land to deliver the Borough’s housing need over the lifetime of the plan. The approach would increase opportunity for people from all social groups to live in good quality, affordable housing. (Positive)
SA 2. To Improve Safety and security for people and property	N/A
SA3. To create and retain healthy , vibrant and inclusive communities	This approach would result in a positive impact against the SA objective. By meeting the Borough’s housing need through the allocation of additional sites, the approach is supporting this SA objective by reducing social exclusion and ensuring the Borough’s population are provided with the right type and tenure of housing. (Positive)
SA 4. To encourage increased participation in cultural, leisure and recreation activities.	N/A
SA 5. To improve accessibility to essential services, facilities and employment	Overall the impact is uncertain, as whilst the provision of new homes would have a positive impact on the Objective, it would inevitably lead to an increased demand on existing services. The actual impact however on access to services will be dependent on the Infrastructure Delivery Plan and the implementation of Local Plan policies. This approach would however allow for the mitigation of the potential negative elements by supporting economic growth and investment in transport. The inclusion of mixed use sites in urban areas with high residential densities would have a positive impact on the objective as residents have good access to essential services, facilities and employment opportunities.

SA Objective	Impacts
	(Uncertain)
<p><b>SA 6. To retain, protect and create a quality, locally distinctive built and historic environment?</b></p>	<p>The impact on this SA objective is uncertain as development will have an impact on the Borough's built and historic environment. If development takes place that does not respect the local built environment, there could be a negative impact, whilst alternatively development could enhance derelict and degraded sites.</p> <p>As with a number of other objectives, the impacts are significantly dependent on the design of developments, and the implementation of Local Plan policy on the built and historic environment.</p> <p>(Uncertain)</p>
<p><b>SA 7. To reduce the risk of flooding and resulting detrimental effects on people and property?</b></p>	<p>The impact is uncertain, as although new development is likely to increase run-off rates, there are opportunities through the water management and flood risk policies to secure sustainable urban drainage systems.</p> <p>As the approach includes sites with recognised flood risk, the appropriate site specific Flood Risk Assessment and modelling will be carried out.</p> <p>(Uncertain)</p>
<p><b>SA 8. To reduce the effect of traffic on the environment?</b></p>	<p>The impact is uncertain in relation to this objective, although the new development will have a negative impact on the levels of traffic in the Borough; the extent to which this has a negative impact will be determined by the implementation of Local Plan transport policies and site specific mitigation measures. A positive element resulting from this approach would be the potential investment in transport infrastructure. The increased densities on town centre mixed use sites will reduce the effect of traffic on the environment; however the overall impact would remain uncertain.</p> <p>(Uncertain)</p>
<p><b>SA 9. To protect and enhance biodiversity and geodiversity.</b></p>	<p>The overall impact against the SA Objective is uncertain as in meeting the</p>

SA Objective	Impacts
	<p>housing requirement there is a requirement for greenfield land to be developed which will have negative impacts on biodiversity. However, the sites have been assessed in terms of their impact on international, national and locally designated sites and measures proposed to mitigate any impact where necessary.</p> <p>The site specific mitigation measures and local plan policies relating to the natural environment will require a net biodiversity gain. This would be a positive impact against this objective</p> <p>The increased densities on town centre mixed use sites will help to protect biodiversity; however the overall impact would remain uncertain. (Uncertain)</p>
<p><b>SA10. To reduce pollution levels and CO2 emissions to target levels.</b></p>	<p>The impact recorded against this Objective is uncertain, as whilst the new development will have a negative impact on the levels of traffic in the Borough, there is likely to be a positive impact against the element concerned with the energy efficiency of buildings (as new build will be required to meet certain energy efficiency requirements). The impact that the level of proposed development will have on the elements of the objective concerned with renewable / low carbon use and generation, air quality, and water quality is uncertain and is addressed through other Local Plan policies.</p> <p>The inclusion of mixed use sites in urban areas with high residential densities would have a positive impact on the objective as residents have less need to travel by private motor vehicle. (Uncertain)</p>
<p><b>SA11. To protect and enhance the natural, semi natural and manmade landscape.</b></p>	<p>Overall the impact is uncertain as whilst new development will have an impact on the Green Belt and the landscape, the Local Plan will contain policies which will ensure any impact is minimised and considered carefully in the determination of applications. Furthermore, site specific mitigation measures and local plan policies relating to the natural environment will require a net biodiversity gain.</p>

SA Objective	Impacts
	(Uncertain)
SA12. To ensure prudent and efficient use of natural resources and energy.	Overall the impact is uncertain as whilst new development will be required to meet certain energy efficiency levels, development of the scale proposed is likely to have a negative impact on the elements of the objective related to water consumption and reducing the use of primary aggregates. (Uncertain)
SA13. To ensure efficient use of land?	On a whole, there would be a positive impact against this SA objective, due to the priority given, through the sequential approach, to the use of previously developed land. There would also be a positive impact in relation to the use of high-density mixed use developments and in reducing the amount of derelict and degraded land. (Positive)
SA14. To reduce the amount of waste produced.	Overall the impact is uncertain as the approach would increase the consumption of materials and resources, although the Local Plan includes policies to manage waste sustainably. (Uncertain)
SA15. To provide good employment opportunities for all.	Overall there is a positive impact as the approach aims to meet the local housing need, which is a significant factor in attracting and retaining a skilled workforce. In addition the approach would have a strong positive impact in relation to supporting economic growth and therefore the creation of jobs, which would reduce economic inequality and poverty. This approach is likely to maintain existing commuting patterns. (Positive)
SA16. To achieve business success, sustainable economic growth, and continued investment.	This would have a strong positive impact in relation to this SA objective by supporting a high level of economic growth. The approach would maintain

SA Objective	Impacts
	<p>existing commuting patterns. There is likely to be a positive impact against the element concerned with energy efficiency, as new employment premises will be required to meet certain energy efficiency requirements. (Positive)</p>
<p><b>SA17. Enhance the viability and vitality of the town centres.</b></p>	<p>The approach to housing delivery in the Borough will help support the existing retailers in the town centres and potentially attract new retailers, particularly when considering the high residential density mixed use sites within those urban areas. Overall there would be a positive impact against this SA objective. (Positive)</p>

### **Mitigation**

2.1 In terms of mitigation, site specific measures have been identified through the individual site SA assessments as well as part of the site assessment process (site specific considerations). Strategic mitigation measures have been identified through the relevant Local Plan strategic policies and objectives.

### **Cumulative Impact**

3.1 Given the limited number of changed impacts on the SA objective arising from the reappraisal of the housing requirement figure and the relatively small number of additional sites proposed, there was no significant change to the cumulative impacts as presented in the 2018 Sustainability Appraisal of the Publication Draft Local Plan. This document should therefore be referred to for the presentation of cumulative impacts.

## Appendix 1 – Site Assessments

### Additional Mixed Use Sites:

Local Plan Site Ref	Location	Site Area	Indicative Developable Area	Residential Capacity	Site Reports
Brighouse					
0573	Land adjacent Mill Royd Street, Mill Royd Street, Brighouse, HD6	2.81	2.35	200	<a href="#">LP0573</a>
Mytholmroyd					
1622	Top Land, Cragg Vale, Hebden Bridge, HX7 5RW	8.38	6.3	50	<a href="#">LP1622</a>
Todmorden					
0327	Land off, Halifax Road, Todmorden, OL14 5AT	0.33	0.16	38	<a href="#">LP0327</a>

### Additional New Housing Sites:

Local Plan Site Ref	Location	Site Area	Indicative Developable Area	Residential Capacity	Site Reports
Elland					
0026	The Gate Farm, Saddleworth Road, Greetland, Elland, HX4 8NW	2.23	2.23	67	<a href="#">LP0026</a>
0177	Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8LG	9.87	6.65	200	<a href="#">LP0177</a>
0952	Land at New Gate Farm, Saddleworth Road, Greetland, Elland	10.63	8.8	246	<a href="#">LP0952</a>
1567	Land adjacent to Exley Lane, North of Elland, Elland	20.53	15.5	450	<a href="#">LP1567</a>
1616	Land at Ainley Top, South West of the Junction of the A643/New Hey Rd, Ainley Top, Elland	2.19	1.6	48	<a href="#">LP1616</a>
1625	Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ	1.01	1.01	30	<a href="#">LP1625</a>
Halifax					
0983	Land at, Maltings Road, Wheatley, Halifax	1.35	0.91	30	<a href="#">LP0983</a>
1128	Land off Park Lane, Siddal, Halifax, HX3	1.06	1.06	38	<a href="#">LP1128</a>
1409	Wood Lane, Off Ovenden Wood Road, Wheatley, Halifax, HX2 0TQ	4.31	3.63	109	<a href="#">LP1409</a>
1590	Land adjacent to the Wells, Stock Lane, Highroad Well, Halifax, HX2 7QP	0.59	0.4	16	<a href="#">LP1590</a>
Mytholmroyd					
0931	Land at, Greave House Field, Luddenden, Halifax	1.21	1.21	44	<a href="#">LP0931</a>
1372	Kershaw Drive, Luddenden Foot, Halifax	3.23	1.79	47	<a href="#">LP1372</a>

Northowram and Shelf					
0766	Land Off, Hall Lane, Northowram, Halifax, HX3 7SN	5.81	3.08	120	<a href="#">LP0766</a>
1034	Land off Soaper Lane, Shelf, Halifax, HX3 7PT	1.97	1.95	58	<a href="#">LP1034</a>
1035	Land at, 30 Burned Road, Shelf, Halifax, HX3 7PT	0.95	0.95	27	<a href="#">LP1035</a>
1036	Land north of Shelf Cricket Ground, Carr House Lane, Shelf, Halifax	0.89	0.89	27	<a href="#">LP1036</a>
1037	Land off, Burned Road, Shelf, Halifax, HX3 7PT	0.90	0.95	31	<a href="#">LP1037</a>
1044	Hud Hill Farm, Northowram, Halifax, HX3 7LH	2.11	1.51	45	<a href="#">LP1044</a>
1523	Land at, Westercroft Lane, Northowram, Halifax, HX3 7EN	1.42	1.42	51	<a href="#">LP1523</a>
Ripponden					
1602	Barkisland Cross, Jackson Lane, Barkisland, HX4 0HE	0.76	0.76	24	<a href="#">LP1602</a>