

Maidstone Local Plan

Sustainability Appraisal

*Sustainability
Statement*

August 2017

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1 Introduction

- 1.1.1 Sustainability appraisal (SA) is a mechanism for considering and communicating the likely effects of a draft plan, and reasonable alternatives; with a view to avoiding and mitigating negative effects and maximising the positives before the Plan is finalised.
- 1.1.2 This document is the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) Statement to accompany the adoption of the Maidstone Local Plan. The Sustainability Appraisal (SA) statement describes the process, how the findings of the SA were taken into account and informed the development of the Local Plan, and the monitoring indicators that will be applied to check the accuracy of predicted effects and to monitor progress against sustainability objectives.
- 1.1.3 A parallel process of SA was undertaken alongside plan-making. AECOM (formerly URS) was commissioned to support Maidstone Borough Council in undertaking the SA process.
- 1.1.4 It is a requirement that SA involves a series of procedural steps. The final step in the process involves preparing a 'statement' at the time of plan adoption.
- 1.1.5 The aim of the SA Statement (i.e. this document) is to present –
1. The 'story' of plan-making / SA up to the point of adoption
- Specifically, the Regulations¹ explain that there is a need to: “summaris[e] how environmental considerations have been integrated into the plan or programme and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of the other reasonable alternatives dealt with.”*
2. Measures decided concerning the monitoring of plan implementation.
- 1.1.6 This Statement considers (1) and (2) in turn.

¹ Environmental Assessment of Plans and Programmes Regulations (2004)

2 *The Plan making 'story'*

2.1 Introduction

- 2.1.1 This section gives consideration to each of the main plan-making / SA steps in turn. It is typical for the plan-making / SA process to involve numerous iterations of the draft Plan, and this was the case with the Maidstone Local Plan.

2.2 Key plan making milestones

- 2.2.1 This section briefly outlines the key milestones throughout the plan-making process and the key elements of the Plan that were developed during each stage.

2006 – Core Strategy Issues and Options

- 2.2.2 Work commenced on the Core Strategy when the Council sought the public's views on local issues and options through a series of café conversations, following which 12 draft spatial scenarios were developed.

2007 – Core Strategy Preferred Options

- 2.2.3 Three broad spatial distribution patterns were presented; 'Urban led, 'edge of centre', and 'new rural settlement'. Each of these options was also divided into a further four growth options ranging from 8,200 to 15,000 households. An assumed number of jobs (based on a 1:3 ratio of jobs per household) associated with each option was also presented for each option. An appraisal of each option was undertaken and presented in an interim SA Report for Maidstone Preferred Options in 2007.

- 2.2.4 A Preferred Option (known as Option 7C) was presented for public consultation in 2007. Option 7C was an edge of centre and urban regeneration led approach that included a dwelling target of 10,080 houses for the plan period between 2006 and 2026, and at least 10,000 new jobs in a range of sectors and locations.

- 2.2.5 Subsequent to this consultation, work was delayed on the Core Strategy due to a major planning application seeking land at junction 8 of the M20 motorway for a strategic rail freight interchange, which was ultimately dismissed at appeal.

September 2011 - Draft Core Strategy

- 2.2.6 Following the restart of the Core Strategy programme (June 2009), the Council focused on updating the evidence base and reviewing local issues that the Core Strategy needed to address, such as providing for gypsy and traveller accommodation, defining the rural service centres, and town centre regeneration. The draft vision and objectives for the Core Strategy were considered by Members in June 2010. By that time, the government had signalled its intention to revoke regional strategies but the new plan making system had yet to be outlined and primary legislation introduced.

- 2.2.7 Maidstone Borough Council responded by agreeing to progress its Core Strategy, and to review the appropriate housing target and the implications of any change to the strategy; to

consider a locally derived local Gypsy and Traveller figure; and to undertake a review the gaps that would be created by the eventual revocation of the South East Plan. However, the delay in revoking the South East Plan alongside previous options testing led the council to agree to carry out a consultation in February 2011 on a housing target of 10,080 dwellings in a dispersed distribution during 2006 to 2026

- 2.2.8 The council consulted the public on its draft Maidstone Borough Core Strategy, which planned for 10,080 dwellings in a dispersed development pattern across the borough for the period 2006 to 2026. The draft core strategy identified broad strategic locations for housing and employment development.

August 2012 – Draft Core Strategy Strategic Site Allocations

- 2.2.9 During 2012 a number of core strategy examinations were suspended due to out of date evidence; the council decided to delay its core strategy programme in order to update the evidence base, including housing need. In March 2013 the council decided to amalgamate the Core Strategy and Strategic Site Allocations preparation into one single Local Plan document, an approach supported by the NPPF. The plan period was rolled forward from 2006-26 to 2011-31. Previous work on the Core Strategy was not lost, and many of its policies were appropriately amended and carried forward as part of the Local Plan preparation.

March 2014 – Draft Maidstone Borough Local Plan (Regulation 18)

- 2.2.10 The draft Local Plan provided a comprehensive planning policy framework and allocated land for development with supporting infrastructure to 2031. A new set of alternatives were presented to reflect the updated objectively assessed housing need of 19,600 homes. Land was allocated for Gypsy and Traveller Accommodation, regeneration focused on the town centre, and provision was made for employment and retail floorspace and a new medical campus. In addition to the protection afforded to international and national designated landscapes, the plan introduced areas of local landscape importance which are highly sensitive to significant change.

October 2015 – Draft Maidstone Borough Local Plan (Regulation 18 Consultation)

- 2.2.11 The council undertook further public consultation where key changes to the draft Local Plan (2014) were proposed. The main amendments related to the following:
- New/deleted/amended housing site allocations;
 - Provision of Gypsy and Traveller accommodation to meet objectively assessed needs;
 - Revisions to Park and Ride provision;
 - A further allocation at Junction 8 of the M20 to meet a qualitative need for employment land;
 - New allocations for natural and semi-natural open space;

- A new designation of Landscape of Local Value; and
- A new policy for nursing and residential care homes.

February 2016 - Maidstone Borough Local Plan (Regulation 19)

2.2.12 The Council published the Local Plan for consultation between February 5th 2016 and March 18th 2016. At this stage, the Plan that has been prepared has responded to feedback from a number of 'Regulation 18 consultations' and several iterations of sustainability appraisal. Though it was not the 'final' Plan, it was the version that the Council intended to submit to the Secretary of State for Examination. Rather than seeking comments on the content and direction of the Plan, the focus of this consultation was on whether the Plan had been prepared in accordance with legal requirements and met the tests of soundness.

Examination and Proposed Main Modifications

2.2.13 Following the Examination hearings, the Council published Proposed Main Modifications to the Plan for public consultation between 31st March and 19th May 2017. Following this consultation, the Planning Inspector's final report on the Local Plan, dated 27th July 2017 concluded that the Maidstone Borough Local Plan provides an appropriate basis for the planning of the borough, providing a number of modifications are made to the Plan.

2.3 SA Preparation alongside the Local Plan

2.3.1 This section outlines the key outputs from the SA process and how they related to the preparation of the Local Plan.

Scoping

2.3.2 The start of the SA process was to prepare and consult on a SA Scoping Report. A number of consultation bodies and other stakeholder bodies were consulted on the Scoping Report in 2009. The scope of the SA was updated in 2012, with findings presented in an interim SA Report for the Maidstone Strategic Site Allocations consultation. The scope was updated again at subsequent stages of plan making, including the draft Plan Consultation in March 2014. All scoping updates were presented in interim SA Reports that were made available for consultation with the statutory consultation bodies as well as a wider range of stakeholders.

Interim SA Report – March 2014

2.3.3 The Interim SA Report in March 2014 accompanied the first draft Local Plan. The Interim report included an updated Scoping section, and assessed the impact of the following reasonable alternatives:

- Strategic approaches to :
 - Housing growth
 - Employment growth
- Site allocations for housing and employment;
- Broad locations for future housing growth;

- Site allocations for Gypsy and Traveller plots;
- Sustainable travel options
- Sustainable construction

Interim SA Report – September 2015

- 2.3.4 Following consultation on the draft Plan, the Council identified further site options for housing, employment and Gypsy and Traveller locations. These sites were assessed through the SA using the site appraisal framework.
- 2.3.5 The findings of the site appraisal process were presented in an interim SA report alongside a focused consultation on site options.
- 2.3.6 This Interim SA Report presented the findings of the site assessment process

SA Report 2016

- 2.3.7 The 2016 SA Report accompanied the version of the Pre-submission version of the Local Plan that was subsequently submitted to government for independent examination. The SA Report appraised a range of alternative approaches to the delivery of the Local Plan strategy for the following topics:
- Housing growth and distribution;
 - Employment growth and distribution;
 - Site Options for housing, employment, and mixed use development;
 - Gypsy and Traveller accommodation;
 - Broad locations for future housing growth;
 - Sustainable Transport.
- 2.3.8 The SA Report also appraised the Local Plan ‘as a whole’, looking at individual policies, site allocations and the overall strategy to understand the sustainability effects and the potential for mitigation and enhancement.

SA Report Addendum - March 2017

- 2.3.9 Following the Local Plan examination hearings an update to the sustainability appraisal was undertaken to take account of the proposed Main Modifications and Minor Changes. This involved a consideration of alternatives to the Main Modifications, and appraisal of each to understand the implications for the sustainability appraisal findings.

3 How has the SA influenced decision making?

3.1 Introduction

3.1.1 Essentially, SA must feed-into and inform plan-making in two ways:

1. Appraisal of alternatives and draft policies should inform preparation of the draft plan.
2. The SA Report, and consultation responses received during the Draft Plan / SA Report consultation, should inform plan finalisation.

3.1.2 This section briefly discusses the key elements of the SA process, and how the findings were fed-into the Plan making process. There is a focus on explaining how sustainability considerations have been taken into account and influenced plan-making, including as a result of alternatives appraisal, site assessments, policy appraisal, and consultation on Plan / SA documents.

3.2 Influencing the spatial strategy

3.2.1 To inform the development of a preferred spatial strategy, several reasonable alternatives were established and appraised in the SA. Though alternatives were identified and tested for early iterations of the Plan (i.e. the Core Strategy), these were re-examined following the decision to prepare a Local Plan, and in light of new evidence on housing needs. Subsequently, six broad alternatives were identified which combined different options for housing growth and distribution. Appraisal of these alternatives helped the Council to understand the implications of different scales of growth and how this might be most appropriately distributed. The Council took the findings of these SA findings into consideration when identifying a preferred option for the Draft Plan of 17,100 dwellings, with a focus on urban extensions to the south east and north west of Maidstone urban area, broad locations at the Town Centre, Maidstone Barracks and Lenham and more proportionate growth and rural centres and other settlements.

3.2.2 The SA broadly supported this approach stating that although there could be negative effects on the character of the landscape and countryside, the preferred alternative does not have a significant negative impact on social and economic factors, and has the least adverse impacts on the character of the landscape and countryside compared to the reasonable alternatives at the same scale of growth or higher.

3.2.3 Following consultation on the draft Local Plan in March 2014, the evidence underpinning the Local Plan developed further. In light of these updates, it was necessary to re-examine the reasonable alternatives for the spatial strategy to ensure that they remained valid and relevant.

3.2.4 Of the six original alternatives appraised alongside the draft Plan in 2014, only two remained reasonable. The housing numbers for the other alternatives fell short of achieving the updated objectively assessed housing needs of 18,560 dwellings.

3.2.5 Given that none of the six original alternatives appraised at draft Plan stage explicitly covered the objectively assessed need of 18,560, it was considered useful to establish ‘new’ alternatives that reflected this updated target. The updated reasonable alternatives for housing growth are presented below.

H1	c19,600 dwellings. The majority of development would be directed to the urban area, including urban extensions to the South East and North West. Would also include three broad locations in the Town Centre, Maidstone Barracks and Lenham. Would allocate a higher number of dwellings in rural centres (i.e. an additional 200 dwellings for each Rural Service Centre compared to H3)
H2	c19,600 dwellings. The majority of development would be directed to the urban area, including urban extensions to the South East and North West. Would also include three broad locations in the Town Centre, Maidstone Barracks and Lenham. However, this alternative would involve the development of a new settlement (4,500 dwellings) to the South East of the urban area. The new settlement takes the form of a ‘garden suburb’ and is located, within the countryside, approximately 1km south east of the existing Maidstone urban area. It would require a significant amount of new infrastructure to be provided at this part of the town, namely the provision of a purpose- built, strategic link road between the A274 Sutton Road and the A20 Ashford Road, as the existing local highway network could not be enhanced to the required standard.
H3	c18,560 dwellings. Similar to alternative H1 in that the majority of development would be located in the urban area, at urban extensions and three broad locations. However, there would be a lesser amount of development in the ‘rest of the urban area’ and less development around other service centres to the South of the Borough.
H4	c18,560 dwellings. This alternative would provide the same distribution of development as alternative 2 (i.e. significant growth through a new settlement). However, the level of development in the rural service centres would be slightly greater, and there would be no development at the three broad locations (Lenham, Town Centre and Maidstone Barracks).
H5	c18,560 dwellings. The same distribution as alternative H3 in that the majority of development would be located in the urban area, at urban extensions, followed by growth at rural service centres. However, there would only be development at two broad locations at the Town Centre and Maidstone Barracks. The additional 1500 dwellings not being delivered at Lenham would be dispersed across the rural service centres (Approximately 250 additional dwellings for each of the five service centres of Lenham, Marden, Staplehurst, Harrietsham and Headcorn and 250 dwellings at the larger villages)

3.2.6 Each of these alternatives was appraised against the SA Framework to help identify the sustainability implications of each approach. Again, the Council considered the findings of the SA (alongside a range of other evidence) to help inform the decision making process regarding the preferred spatial strategy for housing. The Council’s preferred approach was H3, which was broadly supported by the SA findings.

3.2.7 Alternatives H3 met identified housing needs, but was also likely to have a less severe effect in terms of congestion, and other environmental constraints, and likely to be more suitably matched to the number of projected jobs.

Employment

- 3.2.8 As with housing growth, a number of alternative approaches to the distribution of employment development were considered to help inform the preferred strategy. These are outline in the table below.
- 3.2.9 Overall, each of the three alternatives scored fairly similarly against the range of sustainability criteria. This was due to the fact that each contains common elements. However, whilst alternative 1 would be least likely to have negative effects upon congestion, landscape and soils, the positive effects upon the economy, accessibility and deprivation would be less pronounced compared to alternative 2 and (particularly) alternative 3.

Alternative 1	14,394 jobs – included a strategic site at Junction 7 of the M20 (Medical Campus), a high density town centre office development in Maidstone and a focus on redevelopment / extensions to existing sites and industrial sites.
Alternative 2	14,394 jobs - including a strategic site at Junction 7 of the M20 (Medical Campus) and a high density town centre office development in Maidstone. As opposed to alternative 1 there would be less focus on redevelopment or extensions, rather one single large greenfield site would be allocated at Junction 8 of the M20.
Alternative 3	14,394 jobs - including a strategic site at Junction 7 of the M20 (Medical Campus) and a high density town centre office development in Maidstone. This option would include redevelopment or extensions to existing sites and industrial sites, but at a lesser scale than alternative 1. Instead, a smaller scale allocation would be included at Junction 8 of the M20.

3.3 Influencing site allocations

- 3.3.1 Earlier work on the Core Strategy identified four strategic locations; however following the 2011 consultation, this approach was rejected in favour of proposing strategic sites, in line with the NPPF. These strategic sites were presented as reasonable alternatives in the Core Strategy Strategic Site Allocations Public Consultation in 2012. These sites were selected in the context of the preferred strategic approach and evidence at the time, which was based on an overall housing figure of 10,800 dwellings. The sites were subject to sustainability appraisal, the findings of which were presented in the interim SA Report in 2012.
- 3.3.2 In March 2013 the Core Strategy and Development Delivery DPD were amalgamated into a single Maidstone Borough Local Plan, an approach supported by the NPPF, and the plan period was rolled forward from 2006-26 to 2011-31. As the Local Plan began to take shape, the evidence suggested that a higher level of housing growth should be planned for. Therefore, it was likely that a higher amount of housing allocations would need to be identified to give certainty to the delivery of the spatial strategy and identified housing targets. The council therefore sought to allocate more housing land to meet this need, and this involved reconsideration of a range of sites that could be considered ‘strategic’.
- 3.3.3 The Council moved away from specifying and allocating ‘strategic sites’, rather it sought to identify a list of sites to allocate in order to meet the preferred strategic approach and housing targets. As would be expected, a number of these sites were ‘strategic in nature’.

The 'reasonable alternatives' (the site options) were generated using SHLAA and Employment Land Review data as well a 'call for sites'.

- 3.3.4 In total, a list of 20 employment sites, 18 mixed use/retail sites and 185 housing sites were considered as part of the SA site appraisal process. This also included the strategic site options previously consulted on and identified as preferred options in the Core Strategy Strategic Site Allocations Public Consultation in 2012. A strict 'criteria based' appraisal methodology was applied to each site option to determine the sustainability implications.
- 3.3.5 The Council utilised a range of evidence (including the SA site assessment findings) to come to a decision on a list of preferred site allocations. The Council's rationale for allocating sites is presented in the SA Report, including reference to the SA findings where relevant. A summary is provided below (split into different locations), explaining how the SA findings helped to inform the decision making process.

Town centre site options

- 3.3.6 All of the site options considered have been allocated or already have consent. This reflects the spatial strategy, which seeks to focus development in the Maidstone Urban area and maximise brownfield land use where possible. The SA confirmed that as might be expected, the allocated housing sites generally have good access to employment areas, retail and public transport links.

Urban Area North West

- 3.3.7 The selection of the preferred site allocations broadly reflects the findings of the SA. The main issues associated with each of the sites would be the loss of greenfield land, and the potential for impacts on landscape character on some of the sites. The SA indicates that four of the allocated housing sites are located in close proximity to Ancient Woodland, and identifies the need to consider the potential impacts of developing these sites on ancient woodland and possible mitigation. Where sites were allocated in the Plan, these SA recommendations were taken into consideration in the development of site specific policies.

Urban Area South East

- 3.3.8 The selection of the preferred allocations broadly reflects the findings of the SA. Apart from access to a train station, each of the allocated sites is in fairly close proximity to local services such as schools, GP, a bus stop and play space.
- 3.3.9 The SA supported the rejection of the site that forms the proposed 'new settlement'. Although some local facilities are fairly close to the site, development here would require new services to support the significant new community that would be created. This site also has the potential for greater impacts on landscape character compared to the alternative site options in this area. This site also contains a significant amount of best and most versatile agricultural land and is in fairly close proximity to Ancient Woodland. The County Ecologist has also stated there is potential for significant ecological impacts at this site.

Rest of Urban Area

- 3.3.10 The allocated housing sites generally have good access to key services and public transport links. The main issue associated with development on the majority of the site options would be the loss of greenfield land. The alternative sites performed very similarly in the SA compared to the preferred site options. The Council considered a wider range of factors when determining its preferred approach.

Harrietsham

- 3.3.11 The allocated sites broadly reflect the SA findings. Although the rejected sites to the north of Harrietsham would be more likely to have negative effects on the setting of the AONB, some of the preferred sites are still sensitive to development and mitigation would be required in the form of landscape buffering and design. These recommendations were taken into consideration by the Council when developing site specific policies within the Plan.

Headcorn

- 3.3.12 Considered as a whole, the allocated sites generally performed better than the rejected sites across the range of sustainability criteria. However, the differences were not significant, and in some cases, the allocated sites presented constraints that are not an issue for some of the rejected sites, although the allocated sites were considered to be better related to the settlement, and some of the rejected sites had a greater potential for effects on the character of the countryside, and heritage assets.
- 3.3.13 There remained issues that needed to be resolved with some of the allocated sites, such as the potential for impacts on listed buildings and the character of Conservation Areas and the countryside.

Lenham

- 3.3.14 The SA findings suggested that overall, each of the sites considered for housing performed similarly across the range of sustainability criteria. The Council considered a wider range of factors when determining its preferred approach.

Marden

- 3.3.15 Considered as a whole, the allocated sites generally perform better than the rejected sites across the range of sustainability criteria; demonstrating that the SA findings helped to inform decision making.

Staplehurst

- 3.3.16 The SA findings demonstrated that some of the preferred sites scored comparably to the rejected sites. However, the Council considered a wider range of factors when determining its preferred approach.

Boughton Monchelsea

- 3.3.17 The SA findings for the sites considered in Boughton Monchelsea illustrate similar performance across the different options. The Council considered a wider range of factors when determining its preferred approach.

Coxheath

- 3.3.18 The selection of the preferred site allocations broadly reflects the findings of the SA. There are relatively few environmental constraints at each of the alternative site options in and around Coxheath. The main issue associated with development at each of the sites would be the loss of greenfield land. There is also the potential for negative effects on landscape character.

Hollingbourne (Eyhorne Street)

- 3.3.19 The selection of the preferred site allocations broadly reflects the findings of the SA. Therefore, generally, the allocated sites perform better overall compared to the rejected site options.

Sutton Vallance

- 3.3.20 The appraisal undertaken for the strategic options indicates that development would achieve a better balance in terms of sustainability by focusing on urban areas and the higher order settlements. The preferred strategy reflects these findings.

Yalding

- 3.3.21 The SA findings illustrated that the site options are broadly similar in their performance, with all having access to basic services, but poor access to secondary schools and a local service centre. The Council considered a wider range of factors when determining its preferred approach.

Countryside

- 3.3.22 The SA undertaken for the strategic distribution options highlighted that a dispersed approach to housing development would not make the best use of existing infrastructure and could have significant impacts on the character of rural areas. This is largely reflected in the individual site appraisals, which illustrate that for sites located in the wider countryside, proximity / access to local services and public transport links are typically very poor. Furthermore, whilst a small number of these sites are fairly well located in terms of access to local facilities and services, there are other significant constraints such as proximity to Ancient Woodland and highly sensitive landscapes.
- 3.3.23 The Councils approach reflects the SA findings.

3.4 Influencing broad locations for growth

- 3.4.1 In order to meet housing need without the need to allocate unfavourable sites in the Local Plan, the Council has identified three broad areas for future housing growth that are anticipated to deliver 3,500 homes over the plan period. These are as follows:
- Invicta Park Barracks;
 - Maidstone Town Centre;
 - Lenham.
- 3.4.2 The council did not consider there were any reasonable alternatives to either Invicta Park Barracks or Maidstone Town centre; however the council considered other reasonable alternatives in the shape of Lenham and Headcorn.
- 3.4.3 These two broad locations were appraised consistently through the SA, with the findings suggesting that Lenham performs slightly better across the range of sustainability objectives compared to Headcorn. These conclusions helped to inform the Council's decision to reject the broad location in Headcorn and to identify Lenham as the preferred choice.
- 3.4.4 The Council dismissed the broad location in Headcorn because it is considered further development would have an unacceptable negative effect on landscape of high sensitivity or good condition and flood risk as the village is surrounded on three sides by the functional floodplain of the River Beult and its tributaries.

3.5 Influencing policy content

- 3.5.1 Once draft policies had been written, these were appraised against the SA framework to identify potential positive and negative effects. At this stage, the SA also identified a series of mitigation and enhancement measures, which were then considered by the Council when finalising the policies.

3.6 Influencing the Main Modifications

- 3.6.1 Further sustainability appraisal was undertaken at this stage to understand the implications of the proposed Main Modifications. This involved a consideration of potential alternatives, though none were found to be reasonable. The Modifications were also subjected to appraisal both individually, and also considered 'as a whole'.
- 3.6.2 Though some of the Modifications were identified as having positive implications, none of these were found to be significant or to lead to notable changes to the SA Report findings.
- 3.6.3 No mitigation or enhancement measures were identified throughout the appraisal process at this stage. This is largely due to the fact that the proposed Main Modifications in themselves have been made to enhance positive effects and to mitigate any negative effects.
- 3.6.4 Rather than leading to 'new' significant effects, the modifications largely reduce the negative effects predicted in the SA Report.

4 Monitoring

4.1.1 There is a need to set out the monitoring measures that will be used to monitor the effects of the Local Plan, and whether these correlate to those identified in the SA Report. Monitoring also allows for unforeseen effects to be identified early, and to help understand why predicted positive or negative effects might not be occurring in reality.

4.1.2 The following table sets out the monitoring indicators against each of the SA themes presented in the SA Report. These indicators are unchanged from those identified in the final SA Report.

Sustainability Theme	Monitoring Indicators
Housing	<ul style="list-style-type: none"> • Number of households on the Housing Register. • Number of new dwellings built compared to targets. • Net additional Gypsy and Traveller pitches.
Flooding	<ul style="list-style-type: none"> • New development in the floodplain. • Development permitted contrary to advice by the Environment Agency on flood risk. • % of developments implementing SUDS.
Health	<ul style="list-style-type: none"> • % of residents that consider their health to be good. • Distance travelled to services.
Poverty	<ul style="list-style-type: none"> • Difference in levels of deprivation between the most and least deprived areas. • Levels of unemployment.
Education	<ul style="list-style-type: none"> • Number of schools that are at capacity / surplus. • Pupils achieving grades A-C.
Crime	<ul style="list-style-type: none"> • Levels of crime in town centres. • Crime rates per 1000 population.
Vibrant Community	<ul style="list-style-type: none"> • Loss / gain of community facilities.
Accessibility	<ul style="list-style-type: none"> • % of relevant applications where a Travel Plan is secured. • % of trips to work, school, leisure using public transport, walking and cycling. • Develop indicators to look at access issues in rural areas.
Culture	<ul style="list-style-type: none"> • Number of visits to the Borough.
Land Use	<ul style="list-style-type: none"> • % of development on previously developed land. • Net loss of agricultural land. • Number of new allotment pitches provided through development contributions.
Congestion	<ul style="list-style-type: none"> • Peak traffic flow. • Travel times.

Sustainability Theme	Monitoring Indicators
	<ul style="list-style-type: none"> • Investment in road infrastructure.
Climate Change	<ul style="list-style-type: none"> • CO2 emissions per capita. • Number of new residential developments where the energy /emissions standards in the Building Regulations Part L have been exceeded. • Number of developments where ‘adaptation statements’ have been produced.
Biodiversity	<ul style="list-style-type: none"> • Net loss/gain of designated wildlife habitats. • Condition of wildlife sites.
Countryside and Heritage	<ul style="list-style-type: none"> • Landscape character appraisals and impacts. • Number of heritage restoration projects completed.
Waste	<ul style="list-style-type: none"> • Number of complaints to the Council related to waste storage and collection at new developments. • Amount of construction and demolition waste. • Waste generated per capita.
Water Management	<ul style="list-style-type: none"> • Water availability / consumption ratios. • Ecological / chemical status of water bodies.
Energy	<ul style="list-style-type: none"> • New installed renewable energy capacity. • Total energy consumption.
Economy	<ul style="list-style-type: none"> • Total amount of additional floorspace by type. • Unemployment rate.

5 Conclusions

- 5.1.1 This SA Adoption Statement demonstrates that a robust SA process has been progressed alongside plan-making, with appraisal findings feeding-in to decision-making at numerous junctures. The SA Report demonstrably complies with the SEA Regulations, and is found to be adequate by the Inspector.
- 5.1.2 Several reports having been published for consultation alongside Local Plan documents in order to help ensure informed and effective consultation. Most importantly, the SA Report was published alongside the 'Publication' version of the plan in 2016, presenting all of the information required by Regulations. The report served to inform representations on the plan, and then served to inform plan finalisation.
- 5.1.3 Updates to the SA Report and the preparation of SA Addenda were also undertaken in response to proposed changes / Modifications to the Plan. This did not lead to a material change to the findings of the SA Report.
- 5.1.4 The Inspectors Final Report (July 27th 2017) states that an adequate SA process has been undertaken, which meets legal requirements. Further discussion is provided regarding the consideration of reasonable alternatives for the spatial strategy; which the Inspector considers to be "*appropriately assessed*".

