



Derby City Council Local Plan Sustainability Appraisal

Regulation 19 Sustainability Appraisal Report – Non Technical Summary

Derby City Council

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1.0 Introduction

1.1 Overview

Derby City Council (DCC) are in the process of developing their new Local Plan. The new Local Plan will set out how development will be planned and managed across the city from 2023 to 2043.

The new Local Plan will set a vision for the city's future, identifying where new homes and jobs should go, which areas need protecting and the planning policies that will guide decisions. The Local Plan aims to help to make Derby a vibrant, prosperous and sustainable place to live and work for years to come.

A Sustainability Appraisal (SA) has been undertaken to support the development of the new Local Plan and has played an important role in informing the plan-making process.

1.2 The Derby City Council Local Plan

The new Local Plan will replace the adopted Local Plan (2017) and will set the planning framework for Derby over the next 17 years. It will help meet the City's housing needs and guide future development, including housing, jobs, Derby City Centre, heritage, transport, infrastructure, community facilities, environmental protection, climate resilience, and planning decisions.

The new Local Plan includes 16 objectives, 77 policies, and 26 site allocations (which include both residential and employment sites).

Further details on the vision, objectives, policies and sites can be found in **Section 2** of the **main SA report**.



2.0 Methodology

2.1 What is SA?

A Sustainability Appraisal (SA) is carried out throughout the preparation of a Local Plan to help ensure that sustainability is considered in decision-making. The process, which also meets the requirements of [Strategic Environmental Assessment \(SEA\) Regulations](#), assesses the likely effects of the Plan on the environment, communities and the economy. It helps identify opportunities to improve outcomes and ways to avoid or reduce any potential negative effects.

The Local Plan objectives, policies, development sites and alternatives are appraised against a set of objectives to identify whether there is the potential for significant effects (either positive or negative) and recommendations are put forward to mitigate any significant negative and uncertain effects. Guidance for SA sets out an objectives-led, staged process.

2.2 SA Methodology

2.2.1 Key SA stages

The SA process ensures that sustainability issues are considered in a clear and transparent manner. In particular, the SA process ensures a structured and systematic consideration of sustainability issues through its focus on testing and comparing the merits of different plan alternatives as well as consultation with key stakeholders.

The key stages of the SA process are:

- **Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope;
- **Stage B:** Developing and refining alternatives and assessing effects;
- **Stage C:** Preparing the SA Report (**the current stage**);
- **Stage D:** Consultation and decision-making (**the current stage**); and
- **Stage E:** Monitoring implementation of the plan or programme.



2.2.2 Development of the SA Framework

The SA Scoping Report (Stage A) reviewed relevant plans, policies and programmes, and brought together information on the current social, economic and environmental conditions in the City. It also identified the key sustainability issues facing the area and considered how these may change in the future if the Local Plan is not implemented.

The main output of this stage is the SA Framework, which sets out the key sustainability objectives used to assess the Local Plan. The SA Framework objectives are:

- **SA1:** To build inclusive communities by reducing social exclusion, reducing deprivation, promoting equity, equality and respecting diversity, improving local accessibility to healthcare, education, employment, retail facilities and recreational resources (including open spaces and sports facilities);
- **SA2:** To improve health and wellbeing and reduce health inequalities, improving quality of life for all;
- **SA3:** To deliver economic growth and support the creation of new and retention of existing businesses;
- **SA4:** To create greater employment opportunities, higher value jobs and access to training;
- **SA5:** To reduce crime and the fear of crime for all residents inclusively, improving safety;
- **SA6:** To provide everybody with access to an affordable home which is resilient to the effects of climate change;
- **SA7:** To provide better opportunities for people to participate in cultural, leisure and recreational activities;
- **SA8:** To protect and improve biodiversity, geo-diversity, including protect and enhance favourable conditions on SSSI's, SPAs, SACs and other wildlife sites and improve connectivity between, and access to, green spaces and functional habitats;



- **SA9:** To protect and enhance the character and appearance of the landscape and townscape, including landscape and townscape assets, as well as the area's other natural assets and resources;
- **SA10:** To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and maintain and enhance access to cultural heritage for enjoyment and educational purposes;
- **SA11:** To maintain good local air quality and to minimise noise and light pollution;
- **SA12:** To ensure sustainable management of water resources and to minimise the risk of flooding;
- **SA13:** Adapt to the effects of climate change including flood risk, extreme weather and overheating, and strengthen climate resilience;
- **SA14:** To reduce the contribution towards the emission of greenhouse gases;
- **SA15:** To reduce the number of journeys made by car, within and to and from the area and improve access to jobs, services and facilities;
- **SA16:** To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil, and minerals resources; and
- **SA17:** To minimise the generation of waste and effectively manage waste that is created.



3.0 SA Assessment Findings

3.1 Introduction

The Local Plan has been assessed against the SA Framework to establish potential significant effects that may arise as a result of the Local Plan. Full details of the assessment of the draft Local Plan can be found in **Sections 5, 6 and 7** of the **main SA Report**.

The key to significance of effects is shown in **Table 3-1**.

Table 3-1: Key to Significance of Effects

Significance	Definitions of Effects
Potential for significant positive effects	The option or policy supports the achievement of this objective; it addresses all relevant assessment questions and could result in a potentially significant beneficial effect.
Potential for minor positive effects	The option or policy supports the achievement of this objective; it addresses some relevant assessment questions, although it may have only a minor beneficial effect.
Potential for minor negative effects	The option of policy appears to conflict with the achievement of this objective; it does not address relevant assessment questions and may result in minor adverse effects.
Potential for significant negative effects	The option or policy works against the achievement of this objective; it does not address relevant assessment questions; it could exacerbate a negative situation and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.
Uncertain effects	Uncertain or insufficient information on which to determine the assessment at this stage.
Neutral	The option or policy has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant.



3.2 Assessment of Spatial Options

For the new Local Plan, six spatial distribution options were considered for the distribution and scale of housing development as part of the spatial strategy. **Section 5.1** of the **main SA Report** provides further detail on the spatial options.

Overall, the different spatial strategy alternatives have performed similarly against the majority of SA objectives, however there are some differences, particularly related to housing, economy, employment, biodiversity and landscape and townscape. A summary of the options has been provided below:

Option A

Option A has the potential to result in significant effects for economy. However, uncertain effects have been identified for the historic environment.

Option A1

The assessment of Option A1 has identified two uncertain effects, for housing and the historic environment. Potential significant negative effects have been identified for water environment and climate change.

Option B

Option B has the potential to result in a significant positive effects on housing. However, this alternative has the potential to result in eight significant negative effects, identified for economy, leisure and recreation, biodiversity and natural capital, landscape and townscape, historic environment, water environment, climate change, and geology and soils. Additionally, this alternative has resulted in uncertain effects for crime and safety.

Option C

Option C has the potential to result in the joint highest proportion of uncertain effects (nine), alongside Option D. This alternative also has the potential to result in significant negative effects on housing.

Option D

Option D has also resulted in eight potential significant negative effects, affecting economy, biodiversity, landscape, air, noise and light pollution, water, climate resilience, soils and waste. Uncertain effects have been identified for population and



equality, employment, crime and safety, housing, leisure and recreation, historic environment, greenhouse gases and transport.

Option E

Option E has the potential to result in eight potential significant negative effects, for economy, leisure and recreation, biodiversity, landscape, historic environment, water environment, climate change, and geology and soils. Additionally, the assessment of this alternative has identified uncertain effects for crime and safety.

3.3 Assessment of Policies

The assessment of the Local Plan policies was carried out against the SA Framework. A summary of the potential significant effects is provided in **Table 3-2** below. Further details on the assessment of the Local Plan policies can be found within **Section 6** of the **main SA Report** and **Appendix D** to the **main SA Report**.

Table 3-2: Local Plan Policies Assessment Summary

SA Objective	Summary of Effects
SA1: Population and Equality	Potential significant positive effects have been identified where policies contribute to providing high quality infrastructure, including housing and transport infrastructure that is accessible to all groups, supporting the needs of current and future generations.
SA2: Human Health	Potential significant positive effects on health have been identified where policies contribute to encouraging healthy lifestyles, largely through improving active travel and opportunities for physical activity, as well as reducing health inequalities.
SA3: Economy	Potential significant positive effects have been identified where policies contribute to economic growth and investment within Derby, providing spaces for businesses and employment, as well as supporting retail.
SA4: Employment	Potential significant positive effects have been identified where policies contribute to economic growth, regeneration and additional



SA Objective	Summary of Effects
	employment opportunities within Derby, as well as improving the diversity of employment opportunities available.
SA5: Crime and Safety	Potential significant positive effects have been identified where policies contribute to high quality design and public realm improvements, improving feelings of safety. Uncertain effects have been identified where policies include the potential for new open space and altering lighting during night time hours. However, effects are likely to be determined by individual scheme design.
SA6: Housing	Potential significant positive effects have been identified where policies contribute to improving housing provision within Derby, providing high quality homes across a range of housing types and tenures.
SA7: Leisure and Recreation	Potential significant positive effects have been identified where policies contribute to providing opportunities for informal recreation and result in the development of new leisure and recreation facilities.
SA8: Biodiversity and Natural Capital	Potential significant positive effects have been identified where policies contribute to protecting and enhancing biodiversity and support the development of green and blue infrastructure. Uncertain effects have been identified where policies could lead to development that could result in loss of biodiversity. However, this would be determined by individual developments that may arise.
SA9: Landscape and Townscape	Potential significant positive effects have been identified where policies contribute to high quality design and enhancement of the public realm and landscape setting.
SA10: Historic Environment	Potential significant positive effects on the historic environment have been identified where policies consider heritage assets within



SA Objective	Summary of Effects
	development, and aim to protect and enhance the assets and their settings.
SA11: Air, Noise and Light Pollution	Potential significant positive effects have been identified where policies contribute to reducing pollution within Derby. Uncertain effects have been identified where there is potential for additional light pollution, noise and air pollution to arise from development.
SA12: Water Environment	Potential significant positive effects have been identified where policies contribute to improving blue infrastructure, water quality and flood risk mitigation measures, as well as implementing water efficiency measures. Uncertain effects have been identified where there is potential for increases in flood risk, but effects are likely to be determined by individual scheme design.
SA13: Climate Change	Potential significant positive effects have been identified where policies contribute to implementing climate resilience measures, as well as measures to minimise overheating and ensure energy efficiency.
SA14: Greenhouse Gases	Potential significant positive effects have been identified for policies that contribute to reducing GHG emissions, implementing energy efficiency measures and minimising embodied carbon within developments. Uncertain effects have been identified where effects are likely to be determined by the location of developments that may arise.
SA15: Transport and Accessibility	Potential significant positive effects have been identified where policies support the development of new sustainable transport infrastructure, encouraging a modal shift away from private vehicle use.



SA Objective	Summary of Effects
	Uncertain effects have been identified where effects are likely to be determined by the location of developments that arise and their proximity to the existing transport network.
SA16: Geology and Soils	Potential significant positive effects have been identified where policies encourage the regeneration of existing buildings, use of brownfield land and protection of greenfield land, including agricultural land. Uncertain effects have been identified where development has potential to result in loss of Green Wedges and greenfield land, but this will be determined by individual proposals.
SA17: Waste	Uncertain effects have been identified where policies may result in developments that are resource intensive and could generate a significant amount of construction waste. However, effects will be determined by individual scheme design.



3.4 Assessment of Site Allocations

The assessment of proposed site allocations was carried out in relation to the SA Objectives. Each site which has been allocated has a corresponding site allocation policy. A summary of the findings is detailed in **Table 3-3** below. The full assessment of proposed site allocations can be found in **Appendix E** to the **main SA report**.

Table 3-3: Local Plan Site Allocation Policies Assessment Summary

SA Objective	Summary of Effects
SA1: Population and Equality	Potential significant positive effects have been identified where sites provide new facilities, are well located, and will likely reduce levels of inequalities.
SA2: Human Health	Potential significant positive effects have been identified where sites provide improved access to employment opportunities and recreation opportunities, improving physical health and wellbeing. Uncertain effects have been identified where there is limited information on the type of housing and additional provisions to be delivered.
SA3: Economy	Potential significant positive effects have been identified where sites provide economic development and support employment growth, attracting investment and supporting the development of business parks.
SA4: Employment	Potential significant positive effects have been identified where sites provide a range of employment opportunities across different sectors, including highly skilled sectors, increasing employment opportunities.
SA5: Crime and Safety	Uncertain effects have been identified where sites are located in areas of high crime deprivation and there is limited information on designing out crime principles that may be applied.



SA Objective	Summary of Effects
SA6: Housing	Potential significant positive effects have been identified where sites contribute a large quantity of housing towards meeting Derby's housing target. Uncertain effects have been identified where it is unclear what housing provision will be provided at the site.
SA7: Leisure and Recreation	Potential significant positive effects have been identified where sites contribute to providing additional open space for informal recreation, or provide space for formal recreation, within developments.
SA8: Biodiversity and Natural Capital	Potential significant positive effects have been identified where sites make a significant contribution to the greening of the City Centre.
SA9: Landscape and Townscape	Potential significant positive effects have been identified where sites contribute to high quality design, enhancing the public realm, and landscape assets. Uncertain effects have been identified for sites that have the potential to alter the visual landscape, but effects are likely to be determined by individual scheme design.
SA10: Historic Environment	Uncertain effects have been identified for sites that have potential to alter the setting of nearby heritage assets. However, the nature of effects is likely to be determined by individual scheme design.
SA11: Air, Noise and Light Pollution	No potential significant effects have been identified for air, noise and light pollution.
SA12: Water Environment	Potential significant negative effects have been identified for sites that are located in close proximity to a water body and within Flood Zone 3, with no specific flood alleviation measures proposed. Uncertain effects have been identified for sites where the exact risk to flooding is currently unknown.



SA Objective	Summary of Effects
SA13: Climate Change	Uncertain effects have been identified for sites that are located within an area of Flood Zone 3 and the implementation of flood risk mitigation measures is currently uncertain.
SA14: Greenhouse Gases	No potential significant effects have been identified with regards to greenhouse gas emissions.
SA15: Transport and Accessibility	Potential significant negative effects have been identified for sites that are not well-connected to existing public or active transport links. Potential significant positive effects have been identified where sites are well connected to existing public and active travel routes. Uncertain effects have been identified for sites that are anticipated to include the improvement of pedestrian routes and public transport, however the nature and scale of improvements is currently unknown.
SA16: Geology and Soils	Potential significant negative effects have been identified for sites are located on greenfield land and development will result in the permanent loss of this finite resource. Potential significant positive effects have been identified where sites are located on brownfield land, encouraging the reuse of previously developed land, which represents an efficient use of land.
SA17: Waste	No potential significant effects have been identified with regards to waste.



3.5 Assessment of Alternatives

The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the preferred plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need to include all possible alternatives, but only those that are realistic.

Six alternative spatial options have been considered, the effects of which have been detailed within **Section 3.2**.

Alternative policy and site options have been considered within the SA assessment. Full details on the consideration of alternative policies and sites and assessment findings can be found in **Sections 6.3 and 7.3** of the **main SA Report**.

3.5.1 Assessment of Alternative Policies

The development of the Local Plan policies has not at this stage identified any key policy alternatives, so the assessment of policy alternatives has assessed three scenarios – the application of the existing Local Plan policy, application of the NPPF policy, or no inclusion of the policy.

In general, the application of the existing Local Plan policies, the application of the NPPF, and the ‘no policy’ alternatives could result in fewer potential significant positive effects when compared to the draft Local Plan policies.

Whilst the application of the NPPF would ensure that the Local Plan is sound, the NPPF lacks Derby specific details, which the Local Plan would provide. However, some of the existing Local Plan policies are outdated, and no longer reflect key issues within Derby, such as changing employment needs and City Centre development needs.

The alternatives which would mean not including a policy within the Local Plan could predominantly result in negative effects, including potential significant negative effects. Without Local Plan policies, development would be largely unguided, and additional provisions would be left to developers, which may result in a lack of infrastructure and facilities and potential for harm on designated assets within Derby.



3.5.2 Assessment of Alternative Sites

It should be noted that the outcome of the SA is not the only factor that determines whether a site should be allocated. The deliverability and viability of sites are also key considerations for DCC, as to whether a site or policy can be justified for allocation and inclusion in the final plan.

As identified through DCC's sites study, there are limited sites within Derby that are deemed to be suitable to develop. When identifying potential allocation sites, DCC undertook a Site Assessment, establishing 'showstoppers' to site deliverability and whether the site was being actively promoted. The sites allocated within the Local Plan are those which passed the Site Assessment and are deemed to be the only reasonable site allocation options for development within the city.

Section 7.3 of the **main SA Report** outlines the sites considered as part of DCC's sites assessment which outlined the 'showstoppers' to site deliverability, and their inclusion or exclusion within the Local Plan, including rationale for exclusion. This exercise identified 36 sites that are considered undevelopable by DCC, and have therefore been assessed as alternatives within the SA.

A summary of the findings is detailed in **Table 3-4** below. The full assessment of proposed site allocations can be found in **Appendix E** to the **main SA report**.

Overall, the site alternative options have resulted in fewer significant positive effects, across a range of objectives, including population and equalities, human health, economy, employment, housing, leisure and recreation, and landscape and townscape. There are also a higher proportion of significant negative effects associated with site alternatives, mainly in relation to leisure and recreation, landscape and townscape, and geology and soils. There is also a higher quantity of uncertain effects, due to lack of information surrounding scheme level design.



Table 3-4: Local Plan Alternative Sites Assessment Summary

SA Objective	Summary of Effects
SA1: Population and Equality	Uncertain effects have been identified where the type of opportunities available for the local community at the site is currently unclear.
SA2: Human Health	No potential significant effects have been identified for human health.
SA3: Economy	Potential significant positive effects have been identified where sites provide employment opportunities and support investment within Derby City. Uncertain effects have been identified where it is unclear at this stage what economic sectors would be supported at the site.
SA4: Employment	Uncertain effects have been identified where it is currently unclear which employment sectors would be in place at this site, and therefore the type of opportunities available for employment.
SA5: Crime and Safety	No potential significant effects have been identified for crime and safety.
SA6: Housing	Potential significant positive effects have been identified where sites contribute a large quantity of housing towards meeting Derby's housing target. Uncertain effects have been identified where it is unclear what housing provision will be provided at the site.
SA7: Leisure and Recreation	Potential significant positive effects have been identified where sites are well located close to leisure and recreational facilities, providing opportunities for residents to participate in activities. Potential significant negative effects have been identified for sites where development of these sites would result in the loss of open space or recreational space that is not anticipated to be reprovioned.



SA Objective	Summary of Effects
	Uncertain effects have been identified for sites that would result in the loss of leisure and recreation facilities, and it is unclear whether these facilities would be replaced elsewhere in Derby.
SA8: Biodiversity and Natural Capital	Potential significant negative effects have been identified for sites that intersect with designated sites (such as Local Nature Reserves) and have the potential to result in damage to these sites.
SA9: Landscape and Townscape	Potential significant positive effects have been identified for sites that are not in the Green Belt or Green Wedge and are brownfield land, which may result in enhancement of the local landscape and townscape setting. Potential significant negative effects have been identified for sites where development may negatively impact the landscape character and setting and result in development in the Green Belt/Green Wedge. Uncertain effects have been identified for sites that are located away from Green Belt/Green Wedge land, however, the site is located on greenfield land. Effects are therefore likely to be determined by individual scheme design.
SA10: Historic Environment	Potential significant negative effects have been identified for sites that are constrained by the proximity to heritage assets and development at the site has potential to directly impact these buildings and their settings. Uncertain effects have been identified for sites that intersect with heritage assets and there is potential for development to alter the setting of these assets. The nature of effects is likely to be determined by individual scheme design.
SA11: Air, Noise and Light Pollution	No potential significant effects have been identified for air, noise and light pollution.



SA Objective	Summary of Effects
SA12: Water Environment	Potential significant negative effects have been identified for sites located within Flood Zone 2 where there are potential issues with pollution and high groundwater levels. Uncertain effects have been identified for sites that are located within Flood Zone 3 and it is unclear what specific flood alleviation measures may be implemented.
SA13: Climate Change	Uncertain effects have been identified for sites that are located within an area of Flood Zone 3 and the implementation of flood risk mitigation measures is currently uncertain.
SA14: Greenhouse Gases	No potential significant effects have been identified for greenhouse gases.
SA15: Transport and Accessibility	Potential significant positive effects have been identified for sites that are all well connected to existing public and active travel routes. Potential significant negative effects have been identified where sites are not well-connected to existing public or active transport links.
SA16: Geology and Soils	Potential significant positive effects have been identified for sites that are located on brownfield land, encouraging the reuse of previously developed land, which represents an efficient use of land. Potential significant negative effects have been identified for sites that are located on greenfield land and development will result in the permanent loss of this resource.
SA17: Waste	Uncertain effects have been identified for sites located in close proximity to a waste management site and it is subsequently unclear how the presence of the waste site will impact on the development site.



4.0 Cumulative Effects

A cumulative effects assessment was undertaken for the SA. This looked at two different types of cumulative effects – Intra-plan and Inter-plan and project. These are defined as follows:

- Consideration of how different proposed policies and sites within the Local Plan may interact and cause cumulative effects on a receptor (Intra-plan effects); and
- How the proposed policies and sites within the Local Plan could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-plan and project effects).

Further details on the assessment of cumulative effects can be found in **Section 8** of the **main SA Report**.

Intra-plan effects

The intra-project cumulative effects resulting from proposed policies and sites have been outlined below. Further details on the assessment of the inter-project cumulative effects can be found within **Section 8.2** of the **main SA Report**.

Positive effects have largely been identified for SA objectives where policies contribute to improving the current status of the City, for example, improving biodiversity enhancements, reducing flood risk or providing additional community infrastructure. Positive effects have been identified for population and equality, human health, economy, employment, crime and safety, housing, leisure and recreation, biodiversity and natural capital, landscape and townscape, historic environment, air, noise and light pollution, water environment, climate change, greenhouse gases, transport and accessibility, geology and soils, and waste.

Negative effects have been identified for population and equality, human health, biodiversity and natural capital, landscape and townscape, historic environment, air, noise and light pollution, water environment, climate change, greenhouse gases, geology and soils, and waste. There is potential for a cumulative increase in pressure on existing services and facilities, including healthcare, if sufficient facilities are not delivered to accommodate new populations. Development may also lead to a



loss of land and biodiversity if multiple developments occur on greenfield land. There is also the potential for development to negatively affect landscape and townscape views and the settings of heritage assets if located close to assets. There is the potential that multiple developments could result in a cumulative amount of construction waste and emissions of GHGs. Construction of these developments may increase the risk of flooding due to the cumulative increase in hardstanding surfaces.

Inter-plan and project effects

An assessment of the potential cumulative effects of the Local Plan in association with other plans, policies and projects in the surrounding area was completed, looking at potential cumulative impacts at a strategic level. Further details on the assessment of the inter-project cumulative effects can be found within **Section 8.3** of the **main SA Report**.

The following plans were considered:

- A38 Derby Junctions;
- Midlands Rail Hub;
- Derbyshire Local Nature Recovery Strategy;
- Neighbouring Local Plans;
- Neighbouring Transport Plans;
- East Midlands Freeport;
- East Midlands Gateway;

Potential positive cumulative effects were identified for population and equality, human health, economy, employment, crime and safety, housing, leisure and recreation, biodiversity and natural capital, landscape and townscape, historic environment, air, noise and light pollution, water environment, climate change, greenhouse gases, and transport and accessibility.

Potential negative cumulative effects were identified for population and equality, human health, biodiversity and natural capital, landscape and townscape, historic



environment, air, noise and light pollution, water environment, greenhouse gases, transport and accessibility, and waste.



5.0 Mitigation, Enhancement and Monitoring Measures

5.1 Mitigation and Enhancement Measures

Mitigation of significant negative and uncertain effects of the plan and enhancement of positive effects are a key purpose of SA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any potential significant negative effects on the environment.

Proposed mitigation and enhancement measures have been set out in **Table 5-1** below.

Table 5-1: Proposed Mitigation and Enhancement Measures

SA Objective	Source of Effect/s	Mitigation/Enhancement	Mechanism
SA2: Human Health	Sites: HA1 Cumulative Effects	Further assessment as part of scheme design should be undertaken, to evaluate the provision of new education and health facilities and ensure that supply is sufficient to support new communities.	Project level design and assessment
SA2: Human Health	Sites: HA16	As the site will accommodate Gypsy and Traveller households, consideration should be given to ensuring good access to healthcare and community support services, given the potential health inequalities experienced by these communities.	Project level design and assessment
SA4: Employment	Sites: HA2	Scheme level design could consider the potential for improving public transport connections at the site.	Project level design and assessment
SA5: Crime and Safety	Natural Environment Policies	Alterations to artificial light should ensure that lighting is maintained and not removed, particularly in areas of higher crime.	Project level design and assessment
SA5: Crime and Safety	Sites: HA3	New play space should be designed in line with guidance from Make Space for Girls, to aid in feelings of safety.	Project level design and assessment
SA8: Biodiversity and Natural Capital	Housing Policies Economy Policies Infrastructure and Community Policies Transport and Movement Policies Cumulative Effects	Development that may arise as a result of these policies should aim to minimise loss of biodiversity where possible. A Construction Environmental Management Plan (CEMP) should be implemented to aid in minimising disturbance during construction.	Project level design and assessment Project level CEMP
SA9: Landscape and Townscape	Sites: HA1, HA2, HA3, HA4, HA5, HA7, CC4, E5, E8 Cumulative Effects	Sensitive design should be considered for any new developments to minimise adverse effects and enhance landscape and townscape character.	Project level design and assessment



SA Objective	Source of Effect/s	Mitigation/Enhancement	Mechanism
		Particular care should be taken to ensure that high-density development and tall buildings are appropriately designed, located and scaled so that they do not result in significant adverse visual effects.	
SA10: Historic Environment	Sites: HA2, HA6, HA11, HA15, HA16, CC4, CC5, CC11, CC12 Cumulative Effects	Sensitive design should be implemented for any new developments to ensure positive effects on local heritage assets and landscapes. Sensitive design should be considered for development to ensure there are no negative effects upon heritage assets or their settings during construction and operation.	Project level design and assessment
SA10: Historic Environment	Sites: HA4, HA9, CC13, CC14, E8 Housing Policies	A lighting strategy should be prepared to minimise light spill onto heritage assets. Sensitive design should be implemented for any new developments to ensure positive effects on local heritage assets and landscapes.	Project level design and assessment
SA11: Air, Noise and Light Pollution	Housing Policies Transport and Movement Policies Sites: HA2, HA4, HA5, HA6, HA7, HA8, HA9, HA10, HA11, HA12, HA13, HA14, HA16, CC4, CC5, CC11, CC12, CC13, CC14, E5, E6, E7, E8 Cumulative Effects	A Dust Management Plan should be prepared as part of the CEMP. The application of Policy EN22 should also be applied.	Project level CEMP
SA11: Air, Noise and Light Pollution	General Development Principles Policies	Policy GD10 could be expanded to ensure that digital displays do not contribute to excessive levels of light pollution.	Inclusion within preferred Local Plan policies
SA12: Water Environment	Sites: HA1, HA2, HA3, HA4, HA5, HA8, HA13, CC11, CC12, CC13, CC14, E5, E6, E7, E8 Cumulative Effects	Development should be in line with the NPPF and guidance from the Environment Agency.	Project level design and assessment
SA12: Water Environment	Sites: HA2, HA8, HA11, HA12, HA13, CC5, E6, E7, E8	The plan should require appropriate water management strategies, for example, the inclusion of SuDS, within the site allocation supporting text. The sequential test should be undertaken in order to allocate this site.	Inclusion within preferred Local Plan policies
SA13: Climate Change	General Development Principles Policies	Policy GD10 could include reference to ensuring energy efficient digital billboards are implemented and encourage the use of renewable energy sources if appropriate.	Inclusion within preferred Local Plan policies



SA Objective	Source of Effect/s	Mitigation/Enhancement	Mechanism
SA13: Climate Change	Sites: HA1, HA2, HA3, HA4, HA5, HA6, HA7, HA8, HA9, HA10, HA11, HA12, HA13, HA14, HA15, HA16, CC4, CC5, CC11, CC12, CC13, CC14, E5, E6, E7, E8 Cumulative Effects	Development should be encouraged to incorporate renewable energy generation methods such as solar panels, and should incorporate design measures that will reduce effects of climate change, such as zonal heating systems, water saving initiatives and energy monitoring devices.	Project level design and assessment as part of subsequent EIA/ planning application
SA14: Greenhouse Gases	Housing Policies Cumulative Effects	The design of new developments should include the implementation of renewable energy generation measures where possible.	Project level design and assessment
SA14: Greenhouse Gases	Economy Policies	Development that may arise as a result of these policies should aim to utilise low carbon materials within construction.	Project level design and assessment
SA13: Climate Change / SA14: Greenhouse Gases	Sites: HA1, HA2, HA3, HA4, HA5, HA6, HA7, HA8, HA9, HA10, HA11, HA12, HA13, HA14, HA15, HA16, CC4, CC5, CC11, CC12, E5, E6, E7, E8 Cumulative Effects	Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy and should consider BREEAM and BREEAM Infrastructure.	Project level design and assessment as part of subsequent EIA/ planning application CEMP/ Operational Environmental Management Plan (OEMP)
SA15: Transport and Accessibility	Housing Policies Economy Policies Cumulative Effects	Policies should consider ensuring that developments are well located close to public transport modes or provide additional public transport infrastructure.	Inclusion within preferred Local Plan policies
SA15: Transport and Accessibility	Sites: HA12	The development requirements should ensure that a bus service is provided.	Project level design
SA16: Geology and Soils	Natural Environment Policies Transport and Movement Policies Sites: HA1, HA2, HA3, HA4, HA5, HA7, HA12, E5, E8 Cumulative Effects	Where development occurs on greenfield land, this should be focussed upon low value land, for example, which is not of agricultural use, where possible. Where possible, development should be located to avoid the loss of BMV agricultural land.	Project level design and assessment
SA16: Geology and Soils	Sites: CC13, E6, E7	A CEMP should be prepared and include protection of SPZ from contamination.	Project level CEMP



SA Objective	Source of Effect/s	Mitigation/Enhancement	Mechanism
SA17: Waste	Housing Policies Economy Policies Infrastructure and Community Policies Transport and Movement Policies Sites: HA1, HA2, HA3, HA4, HA5, HA6, HA7, HA8, HA9, HA10, HA11, HA12, HA13, HA14, HA15, HA16, CC4, CC5, CC11, CC12, CC13, CC14, E5, E6, E7, E8 Cumulative Effects	A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.	Project level CEMP and OEMP



5.2 Monitoring Measures

The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.

The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the SA, and to deal with any unforeseen problems. Those remaining significant effects (albeit uncertain effects) that remain following the implementation of the mitigation and enhancement measures above include the following:

- SA2: The effects of a growing population on education facilities;
- SA8: The number of new developments achieving biodiversity net gain;
- SA9 and SA10: The potential effects on landscapes and heritage assets including their settings;
- SA12: Flood risk relating to new development;
- SA16: The loss of greenfield/BMV agricultural land; and
- SA17: Levels of waste generations on new developments.

It should be noted that these uncertain effects are generally where limited scheme information is currently available.

Table 5-2 below sets out those monitoring measures which could be suitable in monitoring those uncertain residual effects outlined above.



Table 5-2: Proposed Monitoring Measures

Potential Effects	Potential Key Performance Indicators
SA2: The effects of a growing population on education facilities	The number of new education facilities provided. Number of children enrolled compared to available spaces at schools. The number of new healthcare facilities provided. The GP to patient ratio at existing surgeries
SA8: The number of new developments achieving biodiversity net gain	The number of new developments achieving 10% Biodiversity Net Gain.
SA9 and SA10: The potential effects on landscapes and heritage assets including their settings	Number of developments within Green Belt/Green Wedge. Number of applications granted planning permission contrary to advice from Historic England.
SA12: Flood risk of new development	Number of Environment Agency objections to planning applications.
SA16: The loss of greenfield/BMV agricultural land	Number of developments within Green Belt/Green Wedge. Amount of greenfield, Green Belt / Green Wedge land lost in hectares. Amount of BMV land lost in hectares.



Potential Effects	Potential Key Performance Indicators
SA17: Levels of waste generations on new developments	The amount of construction and demolition waste going to landfill (through Site Waste Management Plans or BREEAM Infrastructure). Household and commercial waste and recycling figures for the City.



6.0 Next Steps

This SA Report is being published for consultation for a 6 week period from 27th July to 8th September 2026. Following consultation on both this SA Report and the Regulation 19 draft Local Plan, comments received on both will be considered. Any necessary changes will be made to the SA and to the Local Plan in response to consultee comments will be reflected within the next iteration of the Local Plan and SA.

The Proposed Submission Local Plan is expected to be published in Summer 2026.

Table 6-1: Local Plan Timetable

Local Plan Activity	Timeframe
Consultation on the Proposed Submission Local Plan - Regulation 19	Summer 2026
Examination	Early 2027
SA Post Adoption	Summer 2027





Making Sustainability Happen