

***Sustainability
Appraisal (SA) of
Wellingborough
Local Plan***

(Submission version)

SA Report

**Non
Technical
Summary**

July 2017

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1. Background to the SA Report

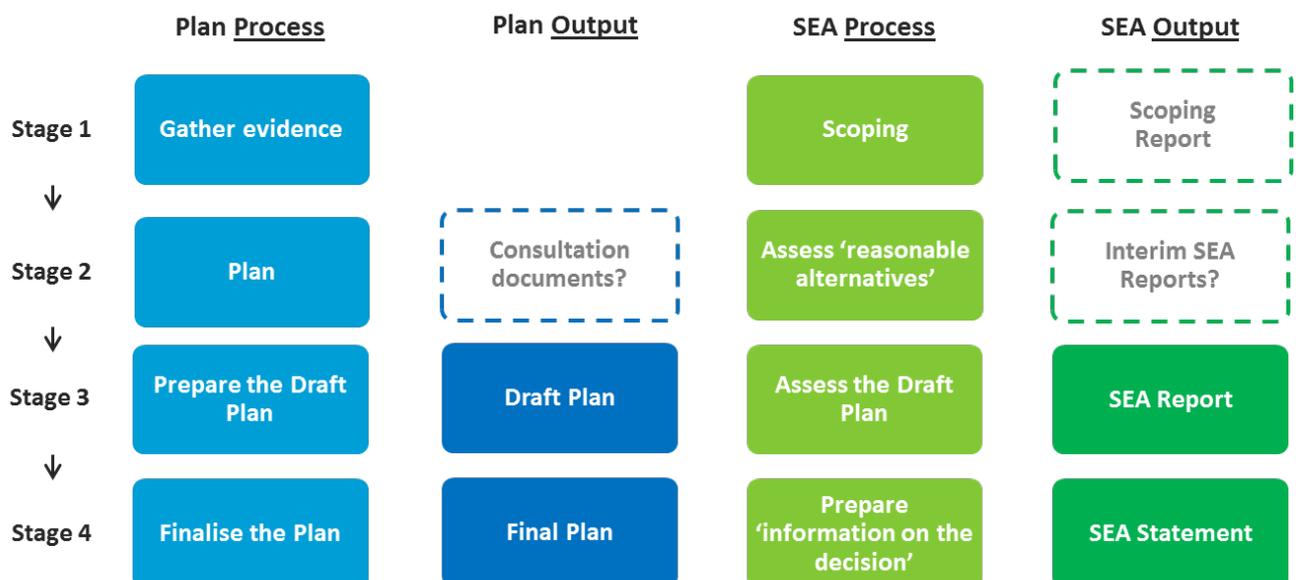
1.1 Introduction

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Wellingborough Local Plan.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.
- 1.1.3 The SA Report has been prepared to support consultation on the submission version of the Local Plan. This document is a non-technical summary of the SA Report.

1.2 The SA process

- 1.2.1 Sustainability Appraisal (SA) is a process for helping to ensure that Local Plans achieve an appropriate balance between environmental, economic and social objectives. SA should help to identify the sustainability implications of different plan approaches and recommend ways to reduce any negative effects and to increase the positive outcomes.
- 1.2.2 SA is also a tool for communicating the likely effects of a Plan (and any reasonable alternatives), explaining the decisions taken with regards to the approach decided upon, and encouraging engagement from key stakeholders such as local communities, businesses and plan-makers.
- 1.2.3 Although SA can be applied flexibly, it is a legal requirement under the ‘Environmental Assessment of Plans and Programmes Regulations 2004 (which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive). The regulations set out prescribed processes that must be followed. In particular, the Regulations require that a report is published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The SA/SEA report must then be taken into account, alongside consultation responses when finalising the plan.
- 1.2.4 SA/SEA can be viewed as a four-stage process that produces a number of statutory and non-statutory outputs. As illustrated in Figure 1.1 below, ‘Scoping’ is a mandatory process under the SEA Directive, but the publication of a scoping report is a voluntary (but useful) output.

Figure 1.1: SA/SEA as a four stage process



2. Scoping

2.1 Scoping

2.1.1 The scoping stage of sustainability appraisal involves the collation of evidence relating to the baseline position and policy context - culminating in a series of key issues that should be a focus for the SA and which helped to establish a sustainability framework.

2.1.2 The Sustainability Topics were established at the scoping stage to reflect the headline principles of sustainable development. These topics also reflect those issues referred to in Schedule 2 of the SEA Regulations, which are suggested as issues that should be addressed in a Strategic Environmental Assessment.

Sustainability Theme	Topics covered	
Social progress which recognises the needs of everyone	<ul style="list-style-type: none"> • Accessibility • Housing • Health • Crime 	<ul style="list-style-type: none"> • Community • Skills • Liveability
Effective protection of the environment	<ul style="list-style-type: none"> • Biodiversity • Landscape 	<ul style="list-style-type: none"> • Cultural Heritage • Climate Change
Prudent use of natural resources	<ul style="list-style-type: none"> • Air quality • Water quality/demand • Flooding/Natural Hazards 	<ul style="list-style-type: none"> • Soil and land • Minerals • Energy use • Waste
Maintenance of economic growth and employment	<ul style="list-style-type: none"> • Employment • Wealth Creation 	<ul style="list-style-type: none"> • Town centres

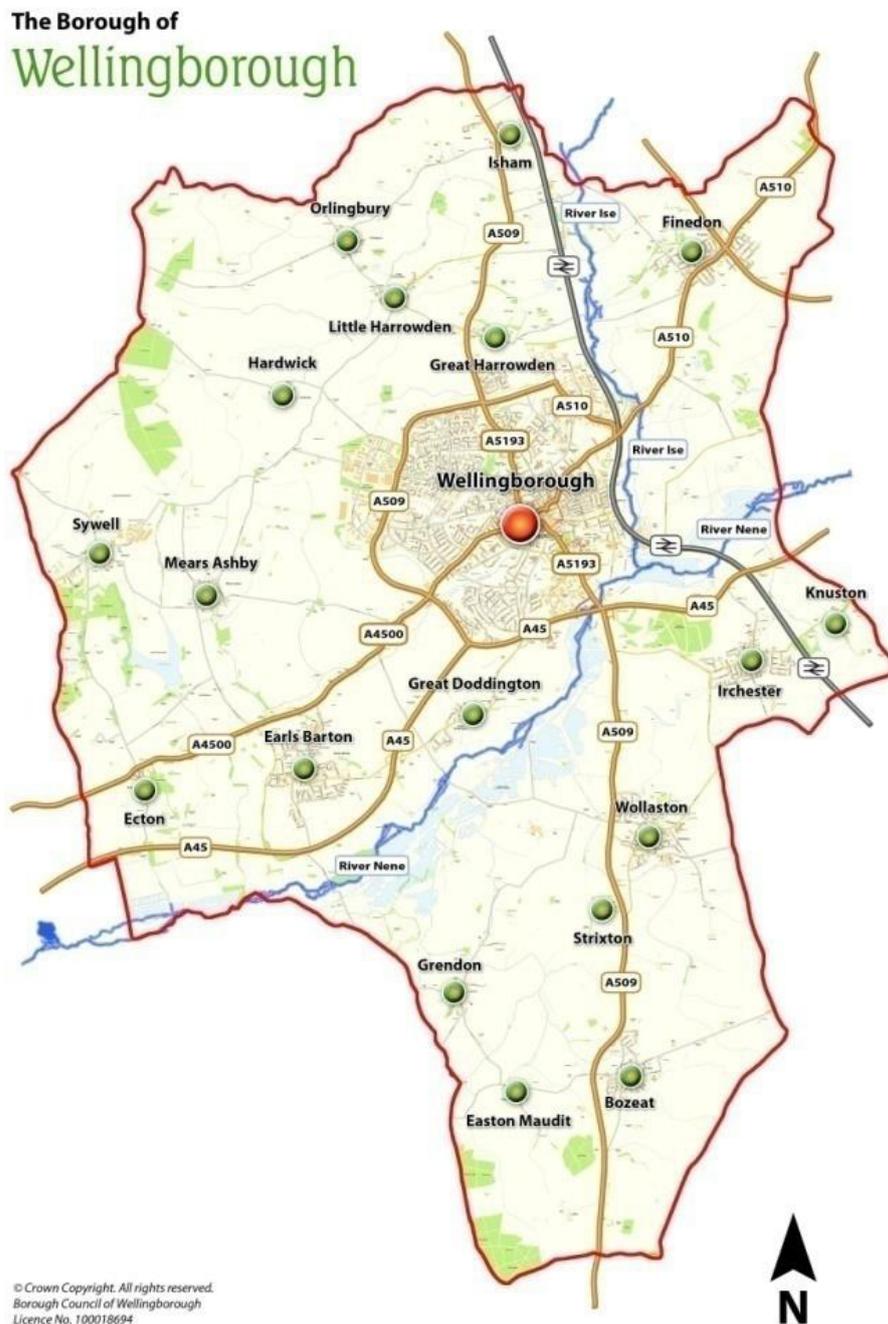
2.2 What is the plan seeking to achieve?

- 2.2.1 The Wellingborough draft Local Plan (the Plan) sets out the spatial strategy for the Wellingborough, as well as key strategic planning policies for development.
- 2.2.2 The Plan contains details about the quantity of housing and employment growth that should be planned for and where it should be located, including through the allocation of specific strategic sites.
- 2.2.3 Within the Plan there is a list of fifteen objectives which seek to address the key issues for Wellingborough. These are as follows:
- **Objective 1** - To improve accessibility and transport links from residential areas to key services, facilities and employment areas and enhance access to natural environment and recreational opportunities
 - **Objective 2** – Ensure that new housing provided meets the housing needs of the area, to provide affordable and decent housing for all
 - **Objective 3** – Improve overall levels of physical and mental health, reduce the disparities between different groups and different areas
 - **Objective 4** – To improve community safety, reduce the incidences of crime and the fear of crime and anti-social behaviour – a safe place to live
 - **Objective 5** – Value and nurture a sense of belonging in a cohesive community whilst respecting diversity
 - **Objective 6** – To improve overall levels of education and skills
 - **Objective 7** – To create healthy, clean and pleasant environments for people to enjoy living, working and recreating in and to protect and enhance residential amenity
 - **Objective 8** – To protect, conserve and enhance biodiversity, geodiversity, wildlife habitats and green infrastructure to achieve a net gain and to avoid habitat fragmentation
 - **Objective 9** – To protect and enhance the quality, character and local distinctiveness of the natural and cultural landscape and the built environment
 - **Objective 10** – Protect and enhance sites, features and areas of historic, archaeological, architectural and artistic interest and their settings
 - **Objective 11** - Reduce the emissions of greenhouse gases and impact of climate change (adaptation)
 - **Objective 12** – To maintain or improve local air quality
 - **Objective 13** – Maintain or improve the quality of ground and surface water resources and minimise the demand for water
 - **Objective 14** – Reduce the impact of flooding and avoid additional risk
 - **Objective 15** – Ensure the efficient use of land and maintain the resource of productive soil
 - **Objective 16**- To mitigate climate change by minimising carbon based energy usage by increasing energy efficiency and to develop North Northamptonshires renewable energy resource, reducing dependency on non-renewable resources
 - **Objective 17**- To reduce waste arisings and increase reuse, recycling and composting
 - **Objective 18**- Maintain and enhance employment opportunities and to reduce the disparities arising from unequal access to jobs
 - **Objective 19**- Retain and enhance the factors which are conducive to wealth creation, including personal creativity, infrastructure and the local strengths and qualities that are attractive to visitors and investors

- **Objective 20-** Protect and enhance the vitality and viability of town centres and market towns

2.2.4 Figure 2.1 below sets out the geographical extent of the Plan area. Whilst the influence of the Plan policies will be restricted to within this boundary, there could well be effects in neighbouring authorities that will need to be considered in the SA process.

2.2.5 **Figure 2.1:** Map of Wellingborough



3. Key issues

3.1 Introduction

- 3.1.1 This section provides a summary of the key findings from scoping. This draws heavily upon the information presented in the Scoping Report, but has been updated where necessary to ensure the scope remains focused on the correct issues for Wellingborough.
- 3.1.2 The key sustainability issues listed below have been identified through an assessment of the baseline information and the contextual review for each of the sustainability topics.

3.2 Population

- The Plan needs to provide for the areas' culturally diverse population.
- The Plan needs to provide for continuing population growth.
- In common with the UK as a whole there will be an increasing elderly population whose needs should be addressed.
- There are pockets of deprivation in the Borough.

3.3 Accessibility

- Public transport at existing levels will not provide sufficient accessibility to essential services and facilities.
- The Plan will need to locate services and facilities where they are most accessible by a range of modes of transport.
- The design of development should ensure that walking, cycling and public transport are easily facilitated.
- Wellingborough is a compact borough offering opportunities to improve levels of walking and cycling.
- Services and facilities are relatively accessible in the town but parts of the rural area have limited accessibility.

3.4 Housing

- There is a need to meet the housing requirement of the growing population including affordability.
- There is a need to meet the needs of Gypsies, Travellers and Travelling Showpeople.

3.5 Health

- Ensuring health facilities (primary and secondary) are as accessible as possible.
- Ensuring the environment does not adversely affect health.
- Providing opportunities for active lifestyles.
- Reducing health inequalities.

3.6 Crime

- Ensuring crime and the fear of crime is considered when designing environments.

3.7 Communities

- The Plan needs to provide for diverse population.
- There is a need to protect high quality community facilities.
- There is a need to enhance low quality existing community facilities.

3.8 Skills

- There is a need to improve skills and qualifications for adults.
- There is a need to find appropriate sites for new schools to meet the needs of a growing population.
- There is a need to increase the offer for further and higher education in the local area.

3.9 Liveability

- There is a need to design high quality environments.
- Ensure opportunities for reducing antisocial behaviour are considered.

3.10 Biodiversity

- There is a relatively limited biodiversity resource.
- Protection of key wildlife sites still remains a priority.
- There is an opportunity for habitat enhancement and creation through new development proposed and to contribute linkages between existing habitats.
- Appropriate Assessment of the SPA will be required for policies and proposals likely to affect the site.

3.11 Landscape

- Quality and distinctiveness of landscape has been eroded by some modern development.
- There are opportunities to improve the tourism offer, and the wider benefits of valued landscapes in terms of the image of the area and the health and wellbeing opportunities.
- The value of the landscape for the image of the area and attractiveness for new development.
- Landscape character assessment should be used to inform the form and design of new development.

3.12 Cultural heritage

- Locally distinctive materials and techniques should be used where possible.
- Important sites and their settings should be protected and enhanced.
- The historic environment is an asset and opportunity for the area.

3.13 Climate change

- Uncertainty of the likely extent of climate change.

- The need to reduce the contribution to the causes of climate change.
- The need to adapt to the impacts of climate change.

3.14 Air

- Air quality in the borough is generally good, but local air quality issues may arise related to traffic growth.

3.15 Water

- Increasing water demands in an area of low rainfall.
- The planned growth poses challenges for the management and limitation of run-off and flood risk.
- The planned growth poses serious challenges for sewage treatment capacity.
- The programme to expand the sewerage treatment works is a considerable factor affecting the build out of potential development.

3.16 Natural hazard

- New developments need to adopt sustainable drainage techniques to mitigate any adverse effects of surface water management to reduce actual or likely flooding.
- There are high concentrations of radon gas in Wellingborough.

3.17 Soil and land

- Ensuring that the highest quality of agricultural land is preserved where possible.

3.18 Minerals

- There is a need to protect mineral reserves.
- Increased demand for minerals as a result of development proposals.

3.19 Energy

- There is an opportunity for increased renewable energy schemes.
- There is a need to reduce greenhouse gas emissions, particularly relating to traffic growth.
- There is a need to reduce energy demand.

3.20 Waste

- Managing waste generated by growth.
- The location of Sidegate Lane Landfill site will necessitate the need to undertake appropriate investigation and assessment of any mitigation which may be required if development is proposed in the vicinity.

3.21 Employment

- There is a long term decline in employment particularly in manufacturing, chemicals and computer related sectors.
- Growth and losses of employment is not evenly distributed across the region.

3.22 Wealth creation

- There is a need to provide an environment which is attractive to visitors and investors.
- The need to provide a skilled workforce.

3.23 Vitality and viability of the town centre

- Floor space and other town centre uses, as well as primary and secondary frontages will need to be reviewed.
- The town centre must provide a high quality environment, reflecting its heritage and cultural status.

3.24 Consultation on the Scope of the SA

3.24.1 The final Scoping Report was published on the Council's website in July 2014. However, it should be remembered that the scope of the SA will continually evolve. As the Local Plan and SA processes progress, so the scope of the SA should be updated and any relevant findings presented in subsequent SA Reports.

3.24.2 It is also important to note that the scope of the SA is influenced by the content of the Plan, and its degree of influence. Given that this Plan follows on from the North Northamptonshire Joint Core Strategy (the JCS), it is important to understand the role of these two parts of the Local Plan for Wellingborough. For example, the JCS already sets the spatial framework, and a number of key policies that do not need to be repeated in the Wellingborough (Part 2) Plan.

4. SA Framework

4.1 The Framework

- 4.1.1 The SA framework is used to predict and evaluate the social, economic and environmental effects of proposed options and policies (and any reasonable alternatives) being considered. It is important that the assessment process is practical and manageable.
- 4.1.2 Drawing on the review of the policy context and baseline information (established through scoping), a range of key sustainability issues were established that identify what the SA should focus upon.
- 4.1.3 These key issues were used as a basis for establishing a series of sustainability objectives and subsidiary questions (to aid the assessment process) that together make-up the Sustainability Appraisal Framework.
- 4.1.4 The table below outlines the SA Framework. The objectives have been grouped in headline themes to allow the natural overlaps that they have to flow, and to make the document easier to follow and read.
- 4.1.5 To add further structure and to aid in presenting the findings succinctly, the SA Objectives have been grouped into headline sustainability topics as detailed below in Table 4.2.
- 4.1.6 The SA objectives that are considered to be similar and likely to generate similar effects have been grouped together although the assessment considers the potential effects on these objectives individually. However, the use of headline topics seeks to reduce duplication and making the report easier for readers. In addition, grouping prevents the same issues being raised under different SA Objectives thus giving the impression of a wider range of negative or positive effects than is actually the case.

Table 4.2: Sustainability themes

Sustainability Theme	Topics covered	
Social progress which recognises the needs of everyone	<ul style="list-style-type: none"> • Accessibility • Housing • Health • Crime 	<ul style="list-style-type: none"> • Community • Skills • Liveability
Effective protection of the environment	<ul style="list-style-type: none"> • Biodiversity • Landscape 	<ul style="list-style-type: none"> • Cultural Heritage • Climate Change
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Maintenance of economic growth and employment	<ul style="list-style-type: none"> • Employment • Wealth Creation 	<ul style="list-style-type: none"> • Town centres

4.2 Site Appraisal Framework

- 4.2.1 A framework for assessing strategic sites has also been developed using the SA Framework as a basis for identifying relevant criteria.
- 4.2.2 It is considered appropriate to assess sites using a range of quantitative data, as this allows for a consistent and objective comparison between different site options. This data can also be supplemented with qualitative assessments. The Site framework can be found on the Councils website.

Part 2: What has plan making and SA Involved up to this point?

5. Reasonable alternatives

5.1 Introduction

5.1.1 The 'story' of plan-making / SA is told within the reasonable alternatives section of the SA Report. It describes:

- How, prior to preparing the draft Plan, there has been an appraisal of alternative approaches to addressing a range of plan issues; and precisely how the Council took account of these 'interim' SA findings when preparing the Plan;
- Why alternatives have not been considered for other plan issues; and
- How the SA findings have influenced the development of policies in the draft Local Plan (i.e. through undertaking assessments before the draft Plan was finalised).

5.2 Identifying and Appraising Alternatives

5.2.1 The SEA Regulations¹ are not prescriptive with regards to what alternatives should be considered. They only state that the SA Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme'.

5.2.2 The following chapters describe how, as an interim plan-making / SA step, reasonable alternatives were considered for the following plan issues:

- The amount and distribution of housing and employment land (i.e. the spatial strategy);
- Housing in the rural areas
- Strategic site options; and
- Other plan issues (i.e. policy approaches)

¹ Environmental Assessment of Plans and Programmes Regulations 2004

6. Housing distribution

6.1 Introduction

- 6.1.1 The Plan has been prepared in the context of the North Northamptonshire Joint Core Strategy (JCS), which sets the spatial strategy for housing and economic growth across the County.
- 6.1.2 As a key objective, the JCS seeks to increase the self-reliance of North Northamptonshire's towns and villages by meeting needs as locally as possible, but at the most sustainable locations. In the case of Wellingborough Borough, this has been identified as the growth town of Wellingborough.
- 6.1.3 In order to deliver the North Northamptonshire Joint Core Strategy, Sustainable Urban Extensions (SUEs) are key building blocks for growth, which involves two SUEs in Wellingborough (North and East) that are already 'committed' (i.e. they have planning permissions).
- 6.1.4 The JCS acknowledges that the four largest villages (Earls Barton, Finedon, Irchester and Wollaston) are significantly bigger than any other villages. In order to focus growth to these locations (which are all in Wellingborough) and to protect the character of these villages, housing targets for these villages have been set in Table 5 of the JCS, with a statement that further development in these areas will be resisted unless agreed through Part 2 Local Plans or Neighbourhood Plans.

6.2 What are the Reasonable Alternatives

- 6.2.1 As described above, the spatial strategy is set out clearly within the JCS. A range of alternative approaches were appraised in the SA that accompanied the JCS.
- 6.2.2 The Part 2 Plan is unable to alter this strategy, and so there are no alternatives to the broad distribution and growth of housing within Wellingborough as a whole or within individual settlements themselves.
- 6.2.3 However, an important role of the Plan is to identify whether locally there is evidence to plan for further housing growth at any of these villages (and overall) to support 'local needs'. As part of the Plan preparation process, the Council has identified that additional housing needs ought to be delivered to support greater housing choice and flexibility to ensure that the JCS targets are delivered. Another important factor is the need to identify a 5 year housing supply which takes account of previous under-supply. In determining where this additional housing should be allocated, the Council identified that in accordance with the focus on growth towns within the JCS strategy that additional housing ought to be focused on Wellingborough.
- 6.2.4 Therefore, **only one reasonable alternative was identified**, which can broadly be summarised as follows.
 - 1. Delivery broadly in-line with the Joint Core Strategy, with an uplift in growth within Wellingborough to secure choice, flexibility and a 5 year supply.

6.3 Unreasonable Alternatives

- 6.3.1 A number of alternatives were considered by the Council, but ultimately determined to be unreasonable. These are discussed below.

Only plan to meet needs set out in the Joint Core Strategy

- 6.3.2 Wellingborough need to demonstrate that a 5 year supply of housing can be provided, as well as allowing for flexibility and choice. If the plan did not make additional housing allocations to take the overall total above the 7000 units identified in the JCS, then the Plan would be at risk of being found unsound. Therefore, this is not considered to be a reasonable alternative.

Increased growth in the named villages rather than Wellingborough?

- 6.3.3 Another factor in determining where additional development ought to be distributed is the level of growth anticipated in the named settlements. Made or emerging Neighbourhood Plans have already identified the level of growth anticipated in three of the four named settlements (*with housing needs studies being undertaken to establish 'local needs'*). The Neighbourhood Plan targets meet and in

the case of Earls Barton exceed the targets within the JCS (see table below). Therefore, promoting further growth to these areas is not considered to be necessary or reasonable.

- 6.3.4 The Council determined that it would not be reasonable to focus additional growth to rural areas to help increase choice, flexibility and establish a 5 year supply. This is because such an approach would not be in accordance with the JCS, which seeks to focus growth in the most sustainable settlements. Growth in the villages and rural areas should only be supported where it cannot be delivered at a higher-order settlement. There are sufficient sites in the Wellingborough Urban Area to support increased growth in a sustainable manner, and so directing growth to the rural areas before here is not considered to be appropriate.

Why has the Preferred Approach Been Selected?

- 6.3.5 In determining where additional housing should be allocated, the Council identified that in accordance with the focus on growth towns within the JCS strategy that additional housing ought to be focused on Wellingborough.
- 6.3.6 The Council determined that it would not be reasonable to focus additional growth to rural areas to help increase choice, flexibility and establish a 5 year supply. This is because such an approach would not be in accordance with the JCS, which seeks to focus growth in the most sustainable settlements. Growth in the villages and rural areas should only be supported where it cannot be delivered at a higher-order settlement or there is evidence of needs. There are sufficient sites in the Wellingborough Urban Area to support increased growth in a sustainable manner, and so directing growth to the rural areas before here is not considered to be appropriate.
- 6.3.7 At this time, no specific requirements have been identified to plan for further housing growth in the rural areas above the level of growth set out in the JCS. However, additional growth could be identified for rural areas should this be evidenced through a Neighbourhood Plan and/or a housing needs survey.

7. Housing growth and distribution in rural areas

7.1 Introduction

- 7.1.1 The target set out in the 'rural areas' of Wellingborough set out in the North Northamptonshire Joint Core Strategy is 540 dwellings. This includes smaller villages and areas in the open countryside (where development should be carefully managed).
- 7.1.2 The strategy determines that the scale of development in an individual village (other than small scale infill opportunities) should be led by locally identified employment, housing, infrastructure and service requirements, and dependent upon the form, character and setting of the village and its proximity to larger settlements.
- 7.1.3 The JCS also states that opportunities for development to meet specific local needs may be identified through Neighbourhood Plans or the Community Right to Build.

7.2 What are the Reasonable Alternatives

- 7.2.1 Taking completions and commitments into account, there is a residual requirement of 275 dwellings for the rural areas over the plan period. In determining whether there are alternative options for delivery of this residual housing target there are three main factors to consider.
- Should higher housing targets be tested in the rural areas?
 - Can this requirement be met through windfall alone?
 - Should allocations be made in certain villages to ensure supply?
- 7.2.2 The following discussion covers each of these issues.
- Should higher targets be tested?
- 7.2.3 At the issues and options stage, developers generally considered there was a need to identify higher levels of housing growth in the rural areas, particularly in order to meet the borough's full objectively assessed housing needs, and ensure a sufficient supply of developable and deliverable housing land.
- 7.2.4 Testing of 'higher levels of growth' has already been undertaken at a broad level in the SA of the Joint Core Strategy through the assessment of a 'dispersed' option. It is not considered necessary to undertake such an appraisal again at local level. However, the Council have sought to identify whether there is any local evidence to support increased growth in particular settlements or the rural area as a whole.
- 7.2.5 Issue 64 of the Issues and Options paper asked whether there are any particular needs or opportunities in the rural area that could be addressed by identifying higher levels of growth than identified in the JCS. No specific needs such as open space or community facilities have been identified by communities which additional housing could help to deliver. Similarly no local opportunities such as underused sites within villages have been identified.
- 7.2.6 Furthermore, with regards to meeting the wider borough housing targets, higher rates of growth have already been identified in Earls Barton (an additional 237 dwellings above local needs) through the made Neighbourhood Plan and existing commitments. These dwellings should also help to meet needs in nearby villages such as Ecton, Mears Ashby and Grendon. The delivery of housing in Finedon could also be 50 dwellings higher than the identified target of 150 as the allocated site has potential to deliver up to 90 dwellings. Again, this could help to meet needs of well-connected villages.

- 7.2.7 The anticipated level of housing delivery of 7,505 in the town of Wellingborough is substantially higher than the 5750 identified in the JCS for the town. However, the Wellingborough housing strategy also has to take account of increased flexibility and the need to plan for a 5 year supply of housing. Notwithstanding this, the overall delivery of housing in Wellingborough is likely to be higher than set out in the JCS. Although not directly related to housing needs in rural areas, this increased level of growth at a more sustainable location ought to provide improved opportunities for accommodation that could also be taken advantage of by residents that may otherwise live in villages, particularly those with good access to the town.
- 7.2.8 Notwithstanding the factors discussed above, the Council have also made it clear that Neighbourhood Plans present an opportunity to deliver locally specific housing needs for villages, where evidence supports this approach. The Plan also commits to a review of housing needs in the rural areas to ensure that its strategy remains appropriate. The JCS also provides sufficient flexibility to allow for local housing needs to be met through exceptions sites through Policy 13.
- 7.2.9 Taking all these factors into account, it is not considered necessary to test higher levels of growth in the rural areas.

Can this requirement be met by windfall alone?

- 7.2.10 The Council demonstrate in Appendix 1 of the rural housing background paper that past completions (the rural areas) over a 16 year period equals 384 dwellings without any sites being allocated for development. A continuation of this rate of development would exceed the residual requirement of 275 dwellings. To facilitate this process, the Council has also committed to a rolling programme of housing needs assessments for villages, and to work with parish councils to identify sites that can help meet needs. Villages could also choose to identify housing through neighbourhood plans. The development of brownfield land registers is also likely to potentially deliver housing in the rural area.
- 7.2.11 JCS Policy 13 also enables sites to be developed in adjoining villages to meet local needs.
- 7.2.12 This rationale is reasonable and supports the Localism agenda by encouraging Parish Councils to take a role in development in their areas. However, one could question a reliance on past rates of windfall, and whether needs in particular villages could be met through the same approach.
- 7.2.13 In particular, the past rates of Windfall may be skewed by higher growth in some settlements, with little growth in others. Understandably, this affects the average rates of delivery over a period of time for the rural areas as a whole. It is therefore useful to understand whether these higher rates of development at some villages are likely to continue in the absence of allocations. One way to better understand this and give greater confidence that windfall will continue at the same rate is to identify larger developments that have been completed and whether similar types of development are likely to come forward over the plan period (*i.e. to demonstrate that these are not 'anomalies' in an overall lower rate of windfall development*).
- 7.2.14 An examination of windfall development across the villages between 2001-2015 demonstrates that the majority of development is small scale and not linked to particular opportunities for regeneration.
- 7.2.15 There are some instances where development was slightly larger in scale, mostly involving demolition of vacant/unused buildings. However, no development is substantial enough to skew the trends in windfall development across the rural area (*the largest being the redevelopment of a public house in Little Irchester into 25 affordable homes*).

Should allocations be made in certain villages to ensure supply?

- 7.2.16 A number of stakeholders made representations on the Issues and Options and Emerging Plan Consultations stating that allocations should be made to meet the identified needs in the JCS. The Council consider that windfall development can provide for needs adequately, and so there is no necessity to allocate sites. Notwithstanding this it is noted that a number of sites have been proposed for development in the villages.

- 7.2.17 These are discussed below to demonstrate how they relate to past rates of delivery in the ‘unnamed’ villages (*given that rates vary between different settlements*).
- 7.2.18 *Little Harrowden* - One site with the potential for 13 dwellings has been discarded by the Council. Past rates of windfall development are fairly consistent across the 15 years, and exceed 13 dwellings. It is likely that the rate of windfall development would exceed that of an allocated site. Therefore, allocation in this settlement is not considered to be necessary.
- 7.2.19 *Orlingbury* – One site with capacity of 55 dwellings has been discarded. Past rates of windfall (42 units) suggest that a similar development quantum could be achieved.
- 7.2.20 *Ecton* – One site with capacity for 42 dwellings has been discarded. This scale of growth is not consistent with the rates of growth in Ecton over the last 15 years. Windfall rates have been very consistent over the last 15 years, so it is not considered necessary to allocate a site of this scale in Ecton (which would essentially triple rates of growth in Ecton over the Plan period compared to the previous 15 years). The scale of growth proposed is not enough to support new facilities, and would therefore put strain on additional services rather than support enhancements.
- 7.2.21 *Sywell* – A large development detached from the settlement is proposed for 584 dwellings. This is not consistent with the spatial strategy in Joint Core Strategy as it essentially represents a small ‘new settlement’. This isn’t a genuine alternative to the delivery of rural housing, as it would focus all growth in one location, providing strategic scale growth in excess of local needs. Windfall development in other rural areas could also still come forward, so essentially, this would represent unnecessary over-provision of housing in Wellingborough. There is no compelling evidence to support a large scale development in the Countryside of this nature, which is not consistent with the JCS. Furthermore, a consent for 120 dwellings in Sywell has already been granted, which ought to make provision for local housing needs.
- 7.2.22 *Mears Ashby* – One site with capacity for 92 dwellings has been discarded. This scale of growth is not consistent with the rates of growth in Mears Ashby over the last 15 years. Windfall rates have been very consistent over the last 15 years, so it is not considered necessary to allocate a site of this scale in Mears Ashby (*which would be a six-fold increase in housing for Mears Ashby over the Plan period compared to the previous 15 years*). The scale of growth proposed is not enough to support new facilities, and would therefore put strain on additional services rather than support enhancements.
- 7.2.23 *Bozeat* – This village represents a large proportion of windfall development in the rural areas (almost one third). Therefore, to meet the residual requirement over the plan period through windfall, there would be a need for rates of growth in this settlement to continue, or for growth in other settlements (with consistently lower rates of growth over the past 15 years) to be increased. With this in mind, the need to allocate sites in Bozeat (or other settlements, if continued levels of growth in Bozeat are not feasible) ought to be explored. The brownfield land register could potentially deliver housing in this settlement, as there are a number of brownfield sites adjacent to the village.

7.3 Unreasonable Alternatives

- 7.3.1 **The Council does not consider that there are any reasonable alternatives to the draft Plan approach.** The reasons for this are discussed in section 7.2, which describes the alternatives that were considered before they were deemed to be unreasonable.

7.4 Why has the Preferred Approach Been Selected?

- 7.4.1 The Council’s preferred approach is to adopt the approach to housing growth and distribution established in the Joint Core Strategy. It is considered appropriate to plan to meet the housing target of 540 dwellings for the rural areas through windfall development.
- 7.4.2 The Council has considered alternative approaches to the delivery of the rural housing target. However, as discussed above, no reasonable alternatives were identified. There is no justification to plan for higher housing targets, nor is there compelling evidence that specific site allocations need to be made to meet housing targets. Choice and flexibility and a clear contingency to meet housing requirements is provided through increased provision at Wellingborough growth town.

8. Strategic site appraisal

8.1 Introduction

- 8.1.1 The Council considered it necessary to allocate sites for development in the Plan in order to ensure delivery of the JCS spatial strategy and housing targets.
- 8.1.2 The selection of sites for allocation is an important part of plan-making which must involve a consideration of all reasonable site options. The SA is one mechanism to assist in this process.

8.2 What are the Reasonable Alternatives

- 8.2.1 The Council identified a range of reasonable site options for the potential allocation as development sites in the Local Plan.
- 8.2.2 This involved a process of 'sieving out' sites from a long-list of options based upon a range of criteria such as; whether they already have planning permission, whether they are critically constrained, whether they are in conformity with the spatial strategy etc.
- 8.2.3 Once a set of reasonable site options had been identified, each was appraised consistently through the SA using a site appraisal framework.

8.3 Why has the Preferred Approach Been Selected?

- 8.3.1 Once the reasonable alternatives had been identified and assessed, the Council sought to identify the most suitable and deliverable sites that most closely match the plans aims and objectives, as well as the sites that are most likely to deliver housing in the plan period.
- 8.3.2 A further set of 'sieving criteria' was applied to the reasonable site options in Finedon to achieve the following objectives:
- Retain sites in active employment use.
 - Retain sites in active community use.
 - Prioritise brownfield sites.
 - Prioritise the most deliverable sites
 - Encourages regeneration.
 - Excludes sites likely to have a significant landscape impact.

Wellingborough Town

- 8.3.3 A further set of sieving criteria was applied to the reasonable site options in Wellingborough to achieve the following objectives:
- To steer new development to the areas with lowest probability of flooding (Policy 5 of the JCS)
 - Retains sites in active employment use unless the site is causing conflict with neighbouring uses (Policy 22 of the JCS)
 - Retains sites in active community use, including allotment use (Policy 7 of the JCS)
 - Prioritises the use of brownfield sites (Policy 6 of the JCS)
 - Prioritises the most deliverable sites where there is a willing developer or landowner involved

- Encourages regeneration of derelict, disused or underutilised sites
- Supports regeneration of the town centre

8.3.4 Following the second stage sieve, **ten sites** remained and all were proposed for allocation. With the exception of two sites, all other sites are already within the Councils 5 year supply of housing land.

8.3.5 Although other sites have been discarded at this stage, the Council has made it clear that other sites could come forward as windfall development in the plan period, provided that they are no longer in employment or community use, the landowner is willing to develop and they comply with the policies of the development plan.

The reasons for discarding alternative sites were varied, but fell within the following broad categories.

- Site in active use
- Site in Flood Zone 2 or 3
- Availability is uncertain
- More suitable town centre uses identified in Town Centre Studies.

Rural areas

8.3.6 Following the stage 2 sieve, only three sites remained, with a total capacity of 162 units. Of these sites, only one is brownfield. Though this site provides the opportunity to regenerate brownfield land, it is not sufficient on its own to deliver the housing target for Finedon.

8.3.7 An additional site adjacent to Milner Road provides the opportunity to allocate two sites together. A comprehensive site would also allow suitable access to the sites.

8.3.8 Although other sites have been discarded at this stage, the Council has made it clear that other sites could come forward as windfall development in the plan period, provided that they are no longer in employment or community use and the landowner is willing to develop.

9. *Alternatives for other plan issues*

9.1 Introduction

- 9.1.1 Thematic planning policies (for example, to consider issues such as ‘design’ and ‘environmental protection’) can be prepared on the basis of a robust evidence base without the need to rigorously assess a series of options as part of the SA at each stage of policy development.
- 9.1.2 A range of options are often presented at an early stage to invite input from stakeholders on what approaches they would prefer. This is a useful exercise, but it is not always productive or necessary to undertake detailed sustainability appraisal on such ‘options’. Rather, the sustainability appraisal framework can be used to help guide policies as they develop, so that the principles of sustainability are ‘frontloaded’. Sustainability Appraisal can then be used more purposefully to inform policy approaches at a later stage of plan development when there is more policy detail (i.e. the ‘preferred options’).
- 9.1.3 For these reasons, it has not been considered necessary or proportionate to undertake an assessment of alternative policy approaches relating to the following issues:
- Heritage;
 - Design;
 - Environmental protection;
 - Climate change;
 - Infrastructure provision; and
 - Town centres.
- 9.1.4 Furthermore, these factors have already been covered through the policies established in the Joint Core Strategy.

Part 3: What are the appraisal findings and recommendations

10. Methodology

10.1 Determining effects

- 10.1.1 The appraisal uses the SA framework as a basis for identifying and evaluating any 'likely effects' on the baseline / projected baseline associated with the Plan approach.
- 10.1.2 It should be noted that effects are predicted based upon the criteria presented within the SEA Regulations². So, for example, account is taken of the nature of effects (including magnitude, spatial coverage and duration), the sensitivity of receptors, and the likelihood of effects occurring as far as possible. The potential for 'cumulative' effects is also considered.³

10.2 Presenting findings

- 10.2.1 The effects of the Local Plan have been identified in accordance with the criteria in Table 10.1; taking into account characteristics including magnitude, scale, duration, frequency and reversibility (i.e. the 'extent' of the effects), the sensitivity of receptors, and the likelihood of effects occurring.

Table 10.1 Determining the effects of the Local Plan

S = An assessment of the significance of effects in light of the effect characteristics.	
↑ Positive effect	↑ Significant +ve effect
↓ Negative effect	↓ Significant -ve effect
↔ No effect / neutral	? Uncertainty
<i>*In some instances it may be appropriate to present both positive and negative effects against the same SA Objective. This reflects the fact that a policy/the Local Plan could have positive effects on an SA objective in one respect, or in one geographical area, and negative effects in other respects / or different areas.</i>	

10.3 Plan policies

- 10.3.1 Table 10.2 below sets out the key chapters and policies within the draft Local Plan. Each of the policies have been appraised individually and in combination to determine the overall effects of the Plan on each of the sustainability objectives.

Table 10.2 Policy content within the draft Local Plan.

Section	Policy	
Spatial Strategy	SS1	Villages
Green Infrastructure Framework	GI 1	Local Green Infrastructure Corridors
	GI 2	Local Open Space
	GI 3	Local Green Space
	GI 4	Enhancement and Provision of Open Space
	GI 5	Enhancement and Provision of Sport and Recreation Facilities
Economy	E 1	Established Industrial Estates
	E 2	Non Employment Uses (non-B) in Established Industrial Estates
	E 3	Employment Outside Established Employment Estates
Delivering	H 1	Urban Housing Allocations
	H 2	Finedon Housing Allocation

² Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

³ In particular, there is a need to take into account the effects of the Local Plan acting in combination with the equivalent plans prepared for neighbouring authorities. Furthermore, there is a need to consider the effects of the Local Plan in combination with the 'saved' policies from the [Old Local Plan].

Homes	H 3	Housing Needs of Older People
	H 4	Retirement Housing, Supported Housing and Care Homes
	H 5	Self-build and Custom Housebuilding
	H 6	Single Plot Exception Sites for Self-Build
Retail Hierachy	R 1	Retail Hierarchy
	R 2	Neighbourhood Shops
	R 3	Local Impact Threshold
Wellingborough Town Centre	TC 1	Town Centre Boundary
	TC 2	Primary Shopping Area
	TC 3	The Market
	TC 4	Shop Fronts
	TC 5	Public Realm
	TC6	Town Centre Car Parking
	TC7	Town Centre Opportunity Sites
	TC 8	Former Post Office Sorting Depot/ BT Exchange
	TC 9	High Street/ Jacksons Lane
	TC 10	Alma Street/ Cambridge Street
Site Specific Proposals	Site 1	Wellingborough East
	Site 2	Wellingborough North
	Site 3	Windsor Road
	Site 4	Land between Finedon Road and Nest lane
	Site 5	Park Farm Way/ Shelley Road
	Site 6	East of Eastfield Road
	Site 7	Leys Road / Highfield Road
	Site 8	Milner Road, Finedon
	Site 9	Sywell Aerodrome

11. Conclusions

11.1.1 Generally, the Plan has been positively prepared, which has led to the identification of **Significant positive effects** for accessibility, housing, health, communities, wealth creation, town centres, biodiversity and water. Positive effects (but not significant) are also recorded for most other sustainability objectives. Some minor negative effects have been predicted for accessibility, liveability and heritage, but it ought to be possible to manage these,

11.1.2 Table 11.1 below presents a graphical summary of the effects identified for each SA topic. Table 11.2 discusses the reasons for these effects being determined in more detail. Full appraisal tables are available in the SA Report.

Table 11.1 – Summary of cumulative effects of the Local Plan on the SA objectives

Social progress which meets the needs of everyone							Maintaining economic growth and employment			Effective protection of the environment				Prudent use of natural resources						
Accessibility	Housing	Health	Crime	Community	Skills	Liveability	Employment	Wealth Creation	Town Centres	Biodiversity	Landscape	Cultural Heritage	Climate Change	Air	Water	Natural Hazard	Soil and Land	Minerals	Energy use	Waste
X			✓		✓	✓	✓				-	✓	✓	-		✓	✓	-	?	-

Table 11.2: Summary of SA findings and proposed monitoring measures

Summary of effects	Monitoring measures
Social progress which meets the needs of everyone	
<p><u>Accessibility</u></p> <p>Overall, the plan is predicted to have a significant positive effect on accessibility within Wellingborough. In particular, the commitment made to include a multi-modal transport link within the SUE at Wellingborough East is predicted to have positive and beneficial effects by enabling greater movement between proposed key housing sites and the borough, something which is supported by the adoption of GI where possible.</p> <p>The Spatial Strategy and Retail Hierarchy should help to concentrate development to the growth town and within the town centre to sites with good public transport links, and the Settlement Hierarchy will also direct housing the named Villages. This distribution of development is likely to promote more effective accessibility between certain nodal points within the borough, and restrict development in areas of poorer accessibility . For this reason, a positive effect is predicted overall. However, improved accessibility for new development and in the town is less likely to benefit rural settlements, which will continue to rely upon some services in higher order settlements.</p> <p><u>Housing</u></p> <p>The Plan is predicted to have a significant positive effect on housing by adopting the JCS spatial strategy and implementing locally specific policies which will support housing delivery. The Plan seek to deliver housing that is well served by GI, services and transport links, it also encourages town centre living, and exceeds the JCS requirement for housing development in Wellingborough. This will help to provide greater certainty that housing will be delivered over the plan period, as well as meeting local needs.</p> <p><u>Health</u></p> <p>Overall, the plan is predicted to generate a significant positive effect on the health and wellbeing of communities across the district. This is due to the cumulative positive effects on health that ought to be generated at a number of new development sites (for both existing and new communities); by protecting existing employment sites and delivering new employment land; through meeting housing needs; by promoting enhanced green infrastructure; and protecting local services and facilities.</p> <p><u>Communities</u></p> <p>The Plan supports the JCS in directing growth to areas that could benefit from development through access to housing, jobs and enhanced environments. The lower levels of development in rural areas are also likely to help maintain the character if smaller villages and retain community identity.</p> <p>A number of plan policies should help to protect neighbourhood shops and community facilities, to reduce vacancy rates, and develop mixed used communities. This should generate a positive effect on community development as it ensures facilities are accessible and useable by communities.</p>	<p><u>Accessibility</u></p> <p>Accessibility to services and facilities from new residential development.</p> <p>Progress on the delivery of multi-modal transport hub.</p> <p><u>Housing</u></p> <p>Housing delivery rates.</p> <p>Affordable homes secured.</p> <p><u>Health</u></p> <p>Indicators of physical and mental health.</p> <p><u>Communities</u></p> <p>None identified.</p> <p>Liveability</p>

Summary of effects	Monitoring measures
<p>The plan also encourages community engagement by encouraging groups to allocate housing within rural areas through neighbourhood planning. This could contribute to communities feeling more empowered.</p> <p>Overall, the plan is predicted to have a significant positive effect on communities. Though individual policies would only be predicted to have minor effects in particular locations; when viewed in combination, the effects are predicted to improve the baseline position with regards to deprivation (which would otherwise be expected to remain fairly static), and to encourage social integration.</p> <p><u>Crime</u></p> <p>The overall effect of the plan with regards to crime is predicted to be positive, but not significant. By locating the majority of development within and around Wellingborough, it is likely that the amount of residential and retail uses would increase within the town centre. This could help to reduce vacancy rates, create more active facades, and increase the number of overlooking units, thereby generating more natural surveillance. All these factors are likely to increase notions of safety for those using the public realm in Wellingborough centre, and may help to deter the opportunities for crime to take place.</p> <p>New development is likely to be safely designed, and new community facilities ought to help provide diversionary activities that may deter anti-social behaviour.</p> <p><u>Skills</u></p> <p>In the main, the plan is unlikely to have significant effects upon skills levels, though the spatial strategy, housing and economic policies ought to ensure that new development is well related to educational facilities and people have access to a decent home and employment (which helps to facilitate learning).</p> <p>Positive effects are predicted as a result of economic policies, which should protect jobs and encourage investment. The Sywell Aerodrome site also provides an opportunity for Wellingborough to specialise in the aviation industry, and may be able to provide valuable training in this sector. This could help to grow the local skills base, and make the borough attractive to further investment.</p> <p>Overall, a positive effect is predicted. This may be significant in the longer term, but there are some uncertainties about the extent to which the plan can help to improve skills.</p> <p><u>Liveability</u></p> <p>For most of the boroughs communities, there would be mainly negligible effect on liveability. However, there could be some localised positive or negative effects on certain communities. For example, acquiring housing in rural areas may be difficult, which could affect those people that wish to remain living in these areas. Conversely, new development opportunities ought to create well designed, attractive environments to live in. The GI policies should have positive effects by helping to maintain the proximity and retention of recreational facilities to communities, and the retail and town centre policies are likely to improve the experience of Wellingborough Town Centre in particular.</p>	<p><u>Crime</u></p> <p>None identified.</p> <p><u>Skills</u></p> <p>Number of jobs created by sector / profession.</p> <p>Number of residents employed within different professions.</p> <p><u>Liveability</u></p> <p>Percentage of people who are happy with the area they live in (<i>Place surveys</i>)</p> <p>Number of amenity related complaints to the Council at new development sites.</p>

Summary of effects	Monitoring measures
<p>With regards to specific site allocations, the majority are not likely to generate any concerns relating to liveability. However, sites 5 and 7 which are both adjacent to Finedon Road Industrial Estate, could potentially put new residential development into contact with surrounding industrial uses. Whilst appropriate mitigation ought to be secured through JCS Policy 8, it would be beneficial to include explicit reference to this within the corresponding site policies.</p>	
<p>Maintaining economic growth and employment</p>	
<p>The plan is predicted to have a positive effect on the economy by supporting the retention and growth of employment in the borough's principal town of Wellingborough.</p> <p>A significant positive effect on <i>wealth creation</i> and <i>town centres</i> is predicted as the spatial strategy, retail hierarchy and town centre strategy should ensure that centres are; more attractive to investment, resilient to competition (e.g. from online platforms and Rushden Lakes), and more attractive places to live and visit.</p> <p>Not significant positive effects on employment are predicted, as the plan ought to ensure that new jobs are accessible to communities in greatest need, as well as helping to reduce commuting. The benefits are most likely to be derived from higher quality jobs, which could help to make Wellingborough more self-reliant. The proximity of new housing to employment could also lead to more efficient and sustainable patterns of travel.</p> <p>Plan policies that seek to improve the environment (notably the GI policies) should help to encourage access to work, as well as creating more attractive environments that could help contribute to investment and improve Wellingborough Town Centre.</p> <p>No significant negative effects have been predicted. Though some landowners may not benefit from the Plan (in rural areas in particular), these effects are not predicted to be significant.</p>	<p><u>Employment</u></p> <ul style="list-style-type: none"> • Unemployment rates • Occupations - % in higher skill categories. <p><u>Wealth creation</u></p> <ul style="list-style-type: none"> • Number of new business set up. • Council tax income receipts. <p><u>Town Centres</u></p> <ul style="list-style-type: none"> • Vacancy rates
<p>Effective protection of the environment</p>	
<p>The Plan approach generates positive effects on the environment through its approach to green infrastructure (which benefits biodiversity, landscape and heritage), high quality design, and site specific mitigation and enhancement measures. The spatial strategy also focuses development to the town centre and named villages, ensuring that effects on the built and natural environment in rural areas are minimised.</p> <p><u>Biodiversity</u></p> <p>With regards to biodiversity, the majority of development is not within close proximity to designated habitats. The potential for increased recreational pressure on the Upper Nene Valley SPA is anticipated to be manageable (According to the JCS HRA), and a mitigation strategy is being prepared to ensure this is the case. Furthermore, the GI strategy, in combination with site specific enhancement measures at the SUEs is predicted to have a significant positive effect on biodiversity by strengthening the quality and linkages between habitats.</p>	<p><u>Biodiversity</u></p> <p>Gross and net change in areas of biodiversity importance (ha)</p>

Summary of effects	Monitoring measures
<p><u>Landscape</u></p> <p>The overall strategy focuses on retaining and enhancing Wellingborough's local character and distinctiveness. This focus alongside the Green Infrastructure requirements and high quality design requirements should ensure there is no significant loss to landscape amenity.</p> <p>Site allocations and policy details for the SUEs, and other housing allocations on the urban fringe of Wellingborough could have mixed effects on landscape. On one hand, directing most of the growth to Wellingborough helps to protect the named villages and smaller villages, whilst on the other; growth on the edge of Wellingborough will alter the transition of the urban area into the countryside.</p> <p>Site specific proposals (alongside more broad policy principles for landscape protection within the JCS) ought to ensure that these effects are not significant though. Consequently, the overall effect across the borough is predicted to be negligible.</p> <p><u>Heritage</u></p> <p>The spatial strategy (set by the JCS) already directs much of the development to Wellingborough, followed by the named villages. The Plan supports this approach through a number of further housing allocations. Whilst some of these are within Wellingborough town centre, or its urban edge, potential negative effects upon heritage are not predicted to be significant. Furthermore, the green infrastructure and town centre policies ought to be positive with regards to the enhancement of the built and natural environment, and so positive effects are recorded for these elements of the Plan.</p> <p><u>Climate change</u></p> <p>The spatial strategy's hierarchical focus, with development being concentrated in existing built up areas (principally in Wellingborough), should help to reduce car journeys and associated greenhouse gas emissions. This strategy is already established in the JCS, and so the effects of the Plan are not significant in this respect. However, the approach to GI, and the requirement for high quality design at the SUEs, ought to generate positive effects in terms of climate change resilience, especially alongside the key GI networks identified in the Plan. Overall a minor positive effect is predicted across the borough.</p>	<p><u>Landscape</u></p> <p>Landscape character assessments.</p> <p><u>Heritage</u></p> <p>Reporting on heritage at risk.</p> <p>Conservation area appraisals.</p> <p>Planning permission granted contrary to advice on heritage.</p> <p><u>Climate change</u></p> <p>Reporting on green infrastructure projects and investment.</p>

Summary of effects	Monitoring measures
Prudent use of natural resources	
<p><u>Air quality</u></p> <p>Increased development has the potential to affect air quality, particularly in areas that already suffer from congestion, and expose pedestrians/residents to emissions. However, much of the development proposed is already established through commitments and the JCS Strategy. Further development is mainly directed to Wellingborough in line with the settlement hierarchy, but the effects are predicted to be negligible as other Plan policies ought to help mitigate and minimise potential air quality issues. For example, the GI network, improvements to the train station at WEAST, Isham Bypass, and the encouragement of sustainable modes of transport. Consequently, a neutral effect is predicted overall.</p> <p><u>Water</u></p> <p>Overall, the spatial strategy, economic and housing policies are not predicted to have significant effects on water. Increased development could potentially affect water quality through increased need for wastewater treatment and through pollution of run off during construction and during the life of developments. Development also places a demand on water, which can affect water supply and abstraction. However, the scale of development proposed (largely through the JCS) is taken into account in water resource planning and is considered to be achievable. With regards to water quality, other policies in the Plan seek to secure SUDs and protect and enhance green infrastructure. There is also specific reference to the need to secure improvements to the river environment as part of Wellingborough East. Together with the broader green infrastructure framework, this is predicted to have a significant positive effect upon water quality. This should help to achieve Water Framework Directive targets for watercourses running through the Borough.</p> <p><u>Natural hazard</u></p> <p>Policy 5 in the JCS already sets the framework for flood risk management, and should also ensure that no significant adverse effects are generated from new development. Furthermore, the spatial strategy directs development mainly away from areas of flood risk, as well as requiring enhancement measures at a number of sites and through GI policies. Consequently the Plan is predicted to have some positive effects on natural hazards/flooding.</p> <p><u>Soil and Land</u></p> <p>Overall, the Plan is likely to have a positive effect on soil and land. The spatial strategy directs development away from the most sensitive agricultural land, whilst supporting appropriate densities and brownfield development in the urban area. Although there are some site allocations on the urban fringe that are within Grade 3 agricultural land, this is not considered to be significant.</p>	<p><u>Air quality</u></p> <p>Annual monitoring of air quality at diffuse tube sites.</p> <p><u>Water</u></p> <p>Achievement / progress towards water framework directive targets for ecological water quality.</p> <p><u>Natural Hazard</u></p> <p>Number of developments approved and completed with SUDs.</p> <p><u>Soil and land</u></p> <p>None identified.</p>

<p><u>Energy use and waste</u></p> <p>As the Plan does not explicitly set out energy use, renewable energy or waste management policies, it limits the significance of effects.</p> <p>Overall, the Plan should contribute to a positive effect for energy, as the spatial strategy ought to reduce the use of energy for transport and be more likely to support district heating schemes. However, the likelihood of such effects being realised are uncertain.</p> <p>Waste management is unlikely to be affected by the Plan.</p>	<p><u>Energy use and waste</u></p> <p>Permitted and completed renewable energy installations by type (excluding Permitted Development) and area, including district heating schemes.</p>
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12. Mitigation and Enhancement

- 12.1.1 As the plan was being developed, the draft policies were subjected to SA, and a small number of mitigation and enhancement measures were suggested through the SA.
- 12.1.2 Generally, the draft Local Plan has been positively prepared and links well to the JCS. There was little scope for suggesting mitigation measures, as no significant negative effects were identified. However, there was some scope for enhancement of positive effects, as well as mitigation where not significant negative effects were identified.
- 12.1.3 Table 12.1 below sets out the measures suggested through the SA below and the response taken by the Council.

Table 12.1: Summary of SA findings and proposed monitoring measures

Issue / opportunity	Mitigation/Enhancement	Council response
There may be an opportunity to enhance accessibility to existing employment sites.	It would be beneficial to support the enhancement of transport links to existing employment sites within Policy E1, which could lead to a positive effect on accessibility.	Reference to enhanced transport links such as opportunities for walking and cycling has been added to para 6.1.6 as an example of enhancing the physical or environmental infrastructure referred to in Policy E1
There is a need to ensure that the types and tenures of new housing are suitable to meet needs.	In order to secure more locally specific mix of housing, the plan could adopt its own policy which establishes local targets regarding housing type and tenure. JCS Policy 30 does set out the overall framework, but also states that Part 2 Plans and Neighbourhood Plans can set more locally specific requirements for particular locations.	Given the changing situation regarding housing tenure set out in the Housing White Paper BCW considers that, at this time, it is better to retain the flexibility provided by JCS policy 30 and use local up-to-date evidence as it becomes available to negotiate for housing types and tenure to meet local need.
There is a need to improve the skills of the local population. It is also important to ensure that deprived communities benefit from increased development in Wellingborough.	In order to garner a more positive effect , the plan could outline a commitment to employ a certain number of local apprentices / workforce to help with the construction of new developments over a certain size (for examples the SUEs).	It is considered that this is adequately covered in the JCS para 8.10 and Policy 22. Para 6.05 of the PBW references Policy 22 of the JCS.
School facilities also have the potential to be used outside of school hours as a flexible community centre, whereby training could take place for a variety of purposes.	The plan could enhance the positive effects of the facilities by outlining the necessity of a multi-functional space within the policy. However, it is acknowledged that the operational aspects of community facilities may be difficult to control.	Policy Site 1 (H) refers to the secondary school having an option for co-located community/sports facilities – this is also referred to in the accompanying text.

Issue / opportunity	Mitigation/Enhancement	Council response
The amenity of communities living in close proximity to Allocated site 5, 7 (and the SUEs to a lesser extent) could be affected by new development.	The potential for effects on amenity at sites 5 and 7 (and the SUEs to a lesser extent) ought to be more explicitly managed through reference to the need for measures to protect amenity of existing and new residents. Though this is covered by JCS policy 8, it would be beneficial to identify the issues through the site specific policies.	This is considered to be adequately covered in general terms by JCS Policy 8. Policy Site 5 (D) now includes a requirement for a landscape buffer between the site and the Finedon Road Industrial Estate and the text in para 10.4.4 refers to the need for a noise assessment. The text to Site 7 also refers to the need for a noise assessment.

Negative effects that recommendations have not been made for

12.1.4 There are certain negative effects that have been identified where it has been considered unnecessary, or not possible to make recommendations for mitigation. These are discussed below.

- There is a small loss of agricultural land associated with urban fringe site allocations. The Council does not consider that there are more suitable sites in the Wellingborough urban area. It is not possible to avoid the loss of agricultural land on these sites, as they are proposed for housing development, as well as a range of landscape and GI measures.
- Changes to landscape character as a result of urban fringe development – Some minor adverse effects have been identified associated with the change to landscape character that is likely to occur at urban fringe sites. The JCS and PBW already contain policies that seek to ensure that landscape character is protected and enhanced. No further measures have been identified, and it is inevitable that some change will occur as the use of land is being changed.
- Minor negative effects upon the setting of heritage assets are identified due to the general increase in development in and around Wellingborough. However, there are plan policies that seek to protect heritage assets and their settings. These should be adequate to ensure that no significant effects are generated. There are also a number of policies that seek to ensure that the town centre environment is improved.

13. Next steps

- 13.1.1 The Council consulted upon an emerging draft of the Local Plan in spring 2016. In response to comments received and further updates to the evidence base, the Council made a number of focused changes to the Plan. The implications of these changes have been considered in the SA, with any changes reflected in this updated SA Report.
- 13.1.2 The Council will now submit the Local Plan to the Secretary of State to be formally examined by an independent Planning Inspector. The SA Report is one of the key pieces of evidence that accompanies the Local Plan.
- 13.1.3 The Examination process may involve making a number of modifications to the Plan in order to make it 'sound'. Any changes that are made will need to be considered in the context of the SA, with further updates to the appraisal provided as deemed necessary.
- 13.1.4 Providing the Inspector is able to find that the Local Plan is 'Sound', it can then be formally Adopted.
- 13.1.5 The timetable moving towards Adoption of the Local Plan is set out in Table 13.1 below.

Table 13.1 – Timetable

Date	Milestone
Sep/Oct 2017	Publication plan consultation
December 2017	Submission
March 2018	Examination Hearings
Oct 2018	Adoption

- 13.1.6 At each of these stages, it may be necessary to undertake additional iterations of SA to account for changes/modifications to the Plan.

Monitoring

- 13.1.7 At the current stage (i.e. within the SA Report), there is a need to present measures envisaged concerning monitoring. As such, Table 11.2 suggests measures that might be taken to monitor the effects (in particular the significant effects) highlighted by the appraisal of the Plan (see Part 3 of this SA Report).