



**South Hams
District Council**

**SUSTAINABILITY APPRAISAL /
STRATEGIC ENVIRONMENTAL
ASSESSMENT of
SOUTH HAMS CORE STRATEGY
(PREFERRED OPTIONS)**

SUSTAINABILITY APPRAISAL REPORT

APPENDIX VI

June 2005

Prepared by

enfusion



**APPENDIX VI
 DETAILED SA OF CORE STRATEGY (PREFERRED OPTIONS) SPATIAL
 STRATEGY AND STRATEGIC POLICIES**

During June 2005, a later version of the Core Strategy policies at a relatively advanced stage of development was appraised in detail. The likely effect of each policy upon each sustainability objective was considered, with comments about whether policy is likely to progress or conflict with each SA objective recorded in matrices. These matrices are presented in this Appendix. The SA of the Core Strategy policies found that, for the most part, the policies were strongly progressive for sustainability.

Where conflicts were identified, possible measures to offset adverse effects were considered, with recommendations to offset them provided in the bottom row of each matrix, again presented in this Appendix. Often, these recommendations do not seek a modification to the Core Strategy itself. Rather, they highlight important aspects or uncertainties regarding the sustainability of policies during implementation, which will need to be taken into account in the development of other Local Development Documents, or in the preparation of development briefs etc.

Recommendations focus on aspects for improvement, thus the content of the report is necessarily skewed towards those aspects where potential adverse effects could arise. On the whole, the findings of the SA suggest that the emerging Core Strategy will make significant contributions to the progression of SA objectives.

Symbols used in the matrices are to be interpreted as follows:

++	Likely to contribute considerably to the achievement of the sustainability objective
+	Likely to contribute somewhat to the achievement of the sustainability objective
-	Likely to conflict somewhat with the achievement of the sustainability objective
--	Likely to conflict considerably with the achievement of the sustainability objective
●	Negligible effect on the achievement of the sustainability objective
0	No identifiable relationship with the sustainability objective
?	Level of effect on the achievement of the sustainability objective unclear

Policy CS 1: Settlement Designation

Note: The SA of this Policy is focussed on a strategic overview of the policy concept, and is not an SA of each designation proposed

SA Objective	Predicted effects	Nature of Effect(s)
Balanced Communities	+	A positive impact may be expected on this SA objective, as the policy encourages the development of self-sufficient

centres capable achieving ‘critical mass’ and thereby providing a sustainable focus for the wider communities they serve. Focussing development in this way is likely to encourage the regeneration and enhancement of balanced, viable communities.

Access	+/?	<p>While some of the development pressure is to be directed to established settlements, because of the scale of Sherford New Community, the success of the policy overall will depend to a great degree on how well principles of sustainability are followed there.</p>
Housing	+/?	<p>By seeking to focus development in viable centres, the policy makes a rational and sustainable choice for the community as a whole. For those living in the centres, access to services and so on will be likely to improve. Inevitably however for those not living there, transport will be a key issue. Strong support for public transport will be necessary to ensure that disadvantaged groups, such as those on low incomes or with limited mobility do not suffer from social exclusion as a result. Funnelling development opportunity into key areas will inevitably make finding acceptable new plots harder for developers elsewhere and this is unlikely to improve either the availability or affordability of business premises or housing. It is also likely to make the smaller settlements even more attractive to those looking for second homes, as these will effectively be protected from further development.</p> <p>On the other hand, these are inevitable and unintentional consequences of a policy that is of overall benefit to the district from a sustainability point of view. Additionally, issues such as affordable housing are safeguarded by other policies in the Core Strategy (e.g. CS5/6).</p>
Quality of the Built Environment	+	<p>The policy is likely to lead to higher densities in existing settlements, thereby acting against land-hungry urban sprawl. As such the policy is likely to have a beneficial impact on this SA Objective.</p>
Health	+	<p>As with other policies in the Core Strategy, the actual effect in the end will depend upon the level of design support in the LDF and also on the quality of development control exercised. The policy helps to protect the open spaces of the countryside, which are important facilities for informal recreation and exercise – vital components of a healthy lifestyle.</p>
Employment	+	<p>On the other hand the indirect consequences of the policy on health (including crime, noise levels, etc.) will depend to a considerable degree on the quality of development that results (see comments under ‘Quality of the Built Environment’ above).</p> <p>The most sustainable location for employment growth is in the settlements identified. As such the effect of the policy is likely to be mainly positive for this SA Objective.</p> <p>However, other policies in the LDF (e.g. development control)</p>

Preferred Options: Appendix VI Detailed SA of Core Strategy (Preferred Options)

		should ensure that this valuable strategic focus does not stifle the promotion of a year round working countryside which provides very local job opportunities (for instance by allowing the re-use of redundant agricultural buildings for employment).
Economic Growth	+	See 'Employment' above.
Landscape	+	The policy is likely to have a strongly positively effect on this sustainability objective by focussing development around existing centres and Sherford New Community.
Land and Soil Quality	+	The policy is likely to have a positive effect on this sustainability objective by encouraging higher density development.
Biodiversity	+	The policy is likely to have a strongly positively effect on this sustainability objective by focussing development around existing centres and Sherford New Community, thereby protecting the more sensitive habitats in the rural parts of the district.
		On the other hand urban areas can also have a value for biodiversity – for instance by providing bat roosts. This need not be a problem providing the interest is recognised in development control policies.
Historic Environment and Cultural Heritage	?	By not being designated, some of the more sensitive small settlements, and the heritage they contain, are effectively protected by this policy.
		On the other hand, in the centres identified, which themselves contain significant heritage (e.g. Dartmouth) the policy may, through encouraging higher density and brownfield development, pose a challenge to this SA Objective.
		The strategic sustainability benefits for other SA Objectives may be overriding, but what happens to the District's valuable heritage resource in the designated centres will depend to a great degree on the quality of other policies, design guidance and the development control regime.
Minerals	●	The effect on this SA Objective is likely to be minimal, although focussing development around existing centres may help prevent the sterilisation of mineral reserves (if any).
Energy	+	The policy is likely to have a positive effect on this sustainability objective by encouraging higher density development, thereby facilitating the viability of local services and reducing the need to travel.
Air Quality	?/+	Locally the policy may have mixed effect. It could safeguard air quality in rural areas, but put pressure on it in the urban centres. Much will depend upon the design of new development permitted, the availability of good public transport and the effectiveness of control of other sources of pollution – e.g. bonfires and industry.
		Globally, the policy should have a positive effect, reducing

Waste	+	overall car use, leading to a gain for global air quality in terms of reduced CO2 emissions. The effect of the policy on this SA Objective should be positive, as meeting recycling targets will be easier when collecting the waste from a more concentrated population. The strategic approach proposed should help make local community recycling facilities more viable.
Water	+/?	Living at higher densities may help promote efficiencies in water use.

On the other hand, the larger urban areas which are likely to result from the policy may increase pressure on local drainage (e.g. rivers) during severe weather. Adequate drainage and flood-control infrastructure will be vital, especially in view of the probable local consequences of Climate Change, which include wetter winters and more frequent 'freak' storms. (see South West Climate Change Impacts Scoping Study, 2003, Cheltenham, UK).

Recommendations

The Policy and Access

Strong support for public transport will be necessary to ensure that disadvantaged groups, such as those on low incomes or with limited mobility do not suffer from social exclusion as a result.

The Policy and Quality of the Built Environment /

The Policy and Historic Environment and Cultural Heritage

Much will depend on the quality of design guidance and of the development control regime.

The Policy and Employment / Economic Growth

Policies elsewhere in the LDF (e.g. development control) should ensure that small scale business development and employment are permitted despite the overall strategic focus.

The Policy and Biodiversity

Urban areas can have a value for biodiversity – for instance by providing bat roosts. This need not be a negative sustainability point for this policy, providing the interest is recognised in development control policies

The Policy and Health / Air Quality

Again, the design of new development will be crucial here. In particular the creation of urban green spaces, including a policy requirement for tree and landscape planting as part of new development where possible, could help mitigate possible air quality problems.

The Policy and Water

It is important that when this strategic policy is turned into site-specific policies that the suitability of the local drainage infrastructure matches not only the norm for the development, and existing needs, but also allows for the predicted effects of climate change.

Policy CS 2: Housing Land Provision

Note: The SA of this Policy is focussed on a strategic overview of the policy concept, and is not an SA of each designation proposed

SA Objective	Predicted	Nature of Effect(s)
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	effects	
Balanced Communities	+	As the District Council is aware, the allocations made by the policy will not meet the actual level of housing need. However, by aiming for an ambitious target of 66% of all new housing to be affordable, the policy is likely to be as sustainable as possible in relation to this SA Objective.
Access	+	By promoting viable self-sustaining communities, the policy is likely to have a positive effect in terms of enabling people to live near where they work. The policy strikes a reasonable balance between containing development in centres, (which facilitates the provision of commercially viable public services and facilities) while allowing for modest new provision in smaller settlements.
Housing	-/+	As the District Council is aware, the allocations made by the policy will not meet the actual level of need, and this may create upward pressure on prices, making local affordability worse. However, by aiming for an ambitious target of 66% of all new housing to be affordable, the policy is likely to be as sustainable as possible in relation to this SA Objective, given the tight constraints of both the buoyant property market and the Structure Plan allocations.
Quality of the Built Environment	?	Directing much of the housing development proposed to Sherford New Community and Newnham means that any impact elsewhere on this SA Objective, either positive or negative, will be minimised. On the other hand, at these two main 'eggs in one basket' locations the possibilities for success or failure are proportionally greater.
Health	●/?	As with other policies in the Core Strategy, the actual effect in the end will depend upon the level of design support in the LDF and also on the quality of development control exercised. The exact impact of this policy on this SA Objective in terms of impact on crime, noise/light pollution etc will depend on the strength of the policies governing design etc. and the robustness and vigilance of the development control regime.
Employment	?/+	The failure to allocate sufficient housing will not assist the needs of sustainable employment, although the shortfall is not great enough to create a significant brake either. Locating much of the growth outside the Plymouth PUA near to Area centres is likely to locate jobs and workers in closer proximity, which is a sustainability gain.
Economic Growth	?	See 'Employment' above.
Landscape	+	By concentrating new housing in a few areas, mainly near to existing centres, the policy is likely to have an overall beneficial effect on this SA Objective.
Land and Soil	+	The policy is likely to have a positive effect on this

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Quality		sustainability objective by encouraging higher density development and so reducing land take.
Biodiversity	+	The policy is likely to have a positive effect on this sustainability objective overall by concentrating new housing in a few areas, mainly near to existing centres. Much depends on specific site locations.
Historic Environment and Cultural Heritage	?	The policy will, through encouraging higher density and brownfield development, pose a challenge to this SA Objective. Much will depend on the quality of design guidance and of the development control regime.
Minerals	●	
Energy	+/?	The policy may have a mainly positive effect on this sustainability objective. The smaller allocations around small settlements proposed are likely to generate more car use. On the other hand, by encouraging higher density development (to higher energy standards) in a relatively few locations, thereby facilitating the viability of local services and more sustainable transport modes, the net effect will probably be beneficial in energy terms.
Air Quality	-/+	The exact consequences of this policy for this SA Objective are hard to predict as much will depend on local circumstances. Local ‘hot-spots’ may experience air quality problems – e.g. from traffic. However, overall, by concentrating housing near to existing settlements, or by creating a new, relatively self-contained community at Sherford the policy may reduce car use (e.g. between settlements), leading to a positive contribution to global air quality and in particular CO ₂ reduction.
Waste	+	The effect of the policy on this SA Objective should be positive compared with a more dispersed housing allocation, as meeting recycling targets will be easier when collecting the waste from a more concentrated population.
Water	+/?	Living at higher densities may help promote efficiencies in water use.

On the other hand, the larger urban areas which are likely to result from the policy may increase pressure on local drainage (e.g. rivers) during severe weather. Adequate drainage and flood-control infrastructure will be vital, especially in view of the probable local consequences of Climate Change, which include wetter winters and more frequent ‘freak’ storms. (see South West Climate Change Impacts Scoping Study, 2003, Cheltenham, UK).

Recommendations

General:

Much will depend on the quality of design guidance and of the development control regime.

The Policy and Biodiversity

The urban districts in which most of the allocations under this policy are located may have a value for biodiversity – for instance by providing bat roosts. This need not be a negative sustainability point for this policy, providing the interest is recognised in development control policies.

The Policy and Health / Air Quality

Again, the design of new development will be crucial here. In particular the creation of urban green spaces, including a policy requirement for tree and landscape planting as part of new development where possible, could help mitigate possible air quality problems.

The Policy and Water

It is important that when this strategic policy is turned into site-specific policies that the suitability of the local drainage infrastructure matches not only the norm for the development, and existing needs, but also allows for the predicted effects of climate change.

Policy CS 3: Employment Land Provision

Note: The SA of this Policy is focussed on a strategic overview of the policy concept, and is not an SA of each designation proposed

SA Objective	Predicted effects	Nature of Effect(s)
Balanced Communities	+/-/?	On one hand, the policy succeeds in allocating a reasonable distribution of sites in sustainable locations close to viable community centres as well as in more rural areas. It thereby satisfies the sustainability objective of providing sites for business and employment within communities.
Access	+/?	On the other hand, while the distribution proposed is sustainable, as the District Council is aware, the total amount of land allocated is restricted by the Structure Plan, and may not be enough to meet local needs. The policy is likely to enhance access to jobs, especially within Sherford New Community, where there is proposed a substantial allocation of employment land.
Housing	●	On the other hand, as noted above, the overall supply may not be sufficient to meet the demand.
Quality of the Built Environment	?	There is a potential for either positive or negative impacts depending on the precise location, nature, scale of the employment development that results and quality of design. As with a number of policies elsewhere in the Core Strategy, much will depend on the quality of design guidance and development control.
Health	●	
Employment	+/?	The policy is likely to have an overall beneficial effect on this SA Objective, as much-needed employment land is released. The policy allows for some limited growth in the countryside, thereby supporting the promotion of local employment and enabling young people to remain within their communities.

However, it is not clear whether the policy goes far enough in either of these two respects. Firstly, it may be the case that

		insufficient land is released. Secondly, the wording of the supporting text could perhaps be changed to more greatly encourage small micro businesses in the countryside. This would help promote a year-round working countryside and could also be linked with the sustainable re-use of redundant farm buildings.
Economic Growth	+/?	See 'Employment' above.
Landscape	•	The exact effects will depend on a range of factors (see 'Quality of Built Environment' above) although locations near to existing settlements should minimise impact on the most sensitive landscapes.
Land and Soil Quality	?	By locating site near to existing centres, potential harm should be minimised. However, it is not clear as to how much emphasis there will be on encouraging development for employment purposes on brownfield sites. Policy CS 4, which deals with this issue, is mainly concerned with housing development, for which a target of 50% is set.
		A clearer statement of policy here would provide better guidance. Incorporating significant areas of brownfield land within the actual site boundaries, or using a 'Brownfield-First' selection principle, would boost the sustainability of the policy.
Biodiversity	?	See 'Land and Soil Quality' above.
Historic Environment and Cultural Heritage	?	The exact effects will depend on a range of factors (see 'Quality of Built Environment' above) and the specific sites chosen.
Minerals	•	
Energy	+	The policy should have a net benefit for this SA Objective, as the siting of businesses close to population centres should reduce the need to travel, thereby promoting energy efficiency. In 2001 63.8% of people in the district travelled to work by car (www.Devon.gov.uk/sustain/transport)
Air Quality	?	The precise local effects are hard to predict, however the energy-efficient locations chosen should help minimise CO ₂ , leading to a positive contribution towards global air quality.
Waste	+	Compared with more dispersed locations, the effect of the policy on this SA Objective should be moderately positive. By encouraging businesses to locate near to existing centres, the recycling of waste produced should be facilitated.
Water	+/?	Living at higher densities may help promote moderate efficiencies in water use.

On the other hand, the larger areas of rapidly-draining ground which are likely to result from the policy may increase peak pressure on local drainage (e.g. rivers) during severe weather.

Adequate drainage and flood-control infrastructure will be vital, especially in view of the probable local consequences of Climate Change, which include wetter winters and more frequent ‘freak’ storms. (see South West Climate Change Impacts Scoping Study, 2003, Cheltenham, UK).

Recommendations

The Policy and Employment

The wording of the supporting text could perhaps be changed to more greatly encourage micro businesses in the countryside.

The Policy and Land and Soil Quality and Biodiversity

The supporting text (perhaps paragraph 5.37) could be amended to reflect the extent to which the re-use of brownfield sites will be a criterion in site selection for Employment Use. The location of employment uses on brownfield land as a first choice principle would considerably enhance the sustainability of this policy.

Policy CS4: Previously Developed Land

SA Objective	Predicted effects	Nature of Effect(s)
Balanced Communities	+	Encourages regeneration and viability of communities
Access	+	More likely to promote integration of transport and other services.
Housing	●	May help to extract maximum potential from available sites, but by potentially restricting large volume Greenfield house-building, the policy could act against short-term affordable housing supply (a crucial issue). Many rural conversions likely to be aimed at the mid-to-top of the market.
Quality of the Built Environment	+	The policy should, in the medium to long term; Protect green and open spaces Encourage innovative and efficient design solutions. Encourage land recycling and the removal of eyesores. However, the effectiveness of the policy will to some extent depend upon the availability of clear design guidance and the robustness of the development control regime in implementing policies such as CS10 (Design).
Health	+	May help to encourage the creation of safe and secure built environment. However the effects of noise and light pollution could represent a challenge, unless adequately covered by other policies and / or design guides / SPD’s.
Employment	●	May indirectly facilitate employment in urban areas but slow in rural ones (see effect on Economic Growth)
Economic Growth	●	May help to improve viability of existing centres, especially in the medium to long term, but may act as a brake on Economic Development in rural areas through a potentially negative

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Landscape	++	impact on the provision of affordable housing. Likely to preserve existing high quality landscapes by diverting development pressure (one third of the District is AONB).
Land and Soil Quality	+	Protects agricultural land and encourages clean-up of contaminated areas.
Biodiversity	+	Has very significant habitat protection capability (e.g. compared with development on Greenfield sites). However, some Brownfield sites may have acquired a locally valuable wildlife habitat role themselves (e.g. Bats). Providing this interest was also protected through policy, and sites were considered carefully on a case by case basis, then the overall benefit to biodiversity would remain.
Historic Environment and Cultural Heritage	++	Likely to put back into use, and thereby help maintain, historic buildings. The magnitude of this benefit could be considerable as one of the main threats to historic buildings is from poor maintenance. May act to encourage conservation and enhancement of the District's 52 designated Conservation Areas. The effectiveness of this policy will depend to a considerable degree on the availability of design and development guidance, and the quality of development control.
Minerals	+	May help to reduce demand in conversions, although minerals are likely to be required for clean-up of some contaminated sites.
Energy	+	May reduce travelling and make best use of existing infrastructure if, as a result of this policy, housing is located in existing urban areas.
Air Quality	●	May help limit transport emissions, but increasing density may pose a challenge for local air quality.
Waste	+	Minimises use and promotes recycling of construction materials. Overall likely to have a positive effect despite possible increase in contaminated construction wastes during rehabilitation of some Brownfield sites.
Water	●	May help reduce pipe-work losses compared with remote Greenfield locations, and may better facilitate adequate water treatment, however the policy could place additional load on existing local infrastructure.

Recommendations

- **The Policy and Sustainable Housing**

The policy has, overall, significantly positive sustainability effects. However, there is a tension between the strongly aspirational target of 50% of housing on PDL, and the acute need for affordable housing in the district. Put simply, if there is already a problem with affordable housing availability, restricting possible locations further is likely to make this worse - unless the issue is tackled adequately by other policies and initiatives. There should be a firm evidence base for the 50% target if it is to be retained.

The aspirational wording of the policy may also lead to difficulties - the word 'should' is

clearly a visionary and aspirational one – but how enforceable are visions and aspirations in practice? Consideration should be given as to whether the wording cannot be made stronger or more specific – for instance by changing the wording to ‘...between 2001 and 2016, **the council will expect or require** at least x %....’ etc.

- **The Policy and Biodiversity**

Policies should be included elsewhere in the LDF to ensure that the flora and fauna value of PDL sites are accounted for in the development process.

- **The Policy and Design Guidance**

Effectiveness of this policy in achieving SA objectives in the areas of **Quality of the Built Environment, Health and Cultural Heritage** will depend to a considerable degree on the quality of guidance and pre-application advice available to developers. Consideration should be given to the provision of design guides / workshops or other schemes as appropriate.

Policies CS5 and CS6: Affordable Housing and Affordable Housing on Windfall Sites

Note:

As the sustainability issues raised by Policies CS5 and CS6 are essentially the same, they are appraised here together.

SA Objective	Predicted effects	Nature of Effect(s)
Balanced Communities	++	Promotes mixed-use, mixed tenure settlements, as well as encouraging social inclusion and community ownership. Likely to help young people stay in the area, redressing the current situation, where the 20-29 age group is under-represented relative to the country as a whole. Potentially a long-term Sustainability benefit.
Access	+	May have a moderate positive impact on reducing isolation of minorities and people with limited mobility – as both categories tend to experience higher than average levels of housing affordability problems.
Housing	++	Recent years have seen steady upward pressure on house prices due partly to substantial population growth from in-migration. With house-prices in the district more than ten times the local wage (2003), the policy is certain to help enable local residents, and especially young people, to remain within their communities and families.
Quality of the Built Environment	?	Cheaper housing need not necessarily be worse housing from the point of view of the impact it has on the Quality of the Built Environment. Much will depend on the quality of design guidance and of local development control in implementing policies such as CS 10 (Design).
Health	+	From the point of view of those who will benefit from Affordable Housing the environments created in new developments are likely to offer significant benefits in terms of improved safety, security, reducing crime and the fear of

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		crime.
Employment	+ / ?	There may be some sustainability benefit for local employment by virtue of providing housing for a local workforce. See 'Economic Growth' heading below.
Economic Growth	+ / ?	The encouragement of Affordable Housing provided by these policies is likely to benefit the local economy by facilitating housing for a mixed local workforce.
Landscape	?	The effects on Landscape will depend on scale, massing and design quality. These are matters that are dealt with to some extent by policies such as CS10. However supplementary Design Guidance would also be useful in avoiding negative sustainability impacts.
Land and Soil Quality	+	May have some low-magnitude and indirect positive impact on this SA objective as Affordable Housing is generally built at higher densities, reducing relative land consumption.
Biodiversity	+	Potentially a low-magnitude positive impact, due to Affordable Housing being built at generally higher densities than Market Housing.
Historic Environment and Cultural Heritage	0	Unlikely to have any direct effect, but depends on location of development.
Minerals	+ / ?	Much depends on method of construction, but Affordable Housing can be less resource-hungry due to smaller unit size and higher site densities. Therefore there may be a moderate positive sustainability benefit in a reduced use of minerals compared with Market Housing. This could be encouraged by other LDF policies or Supplementary Planning Documents, such as design or sustainable building guides.
Energy	+ / ?	As with minerals use, depending on construction methods, the sustainability impact of this policy on energy consumption is likely to be moderately positive. Additional policies encouraging energy efficiency in new developments and conversions would help maximise this benefit.
Air Quality	+ / -	As with energy use, there may be a relative, moderate, overall reduction in CO2 production, both during construction and throughout the life of the properties, due to smaller unit size and higher densities. Energy efficiency is covered under policy CS 13.
		There might conceivably be a very small deterioration in local air quality also due to higher densities, but much will depend on the energy efficiency of the buildings and on matters affecting car use, such as pedestrian/cycle access and the availability of good public transport. Again, policies and guidance elsewhere in the LDF could help mitigate this potential disbenefit.
Waste	0 / ?	In itself, Affordable Housing is unlikely to have a unique impact on waste. However, the potential clearly exists for other policies in the LDF to encourage developers of both Affordable and Market Housing to minimise waste and use recycled products whenever possible.
Water		As with the use of minerals and energy, water use during

+ / ? construction may be less in typical Affordable Housing Units due to smaller size and efficiencies of scale at higher densities. However, much will depend on the methods of construction employed.

Recommendations

The Policies and Minerals, Energy, Water, Waste and Air Quality

Housing, of whatever type, has a significant effect on sustainability not only at the construction phase but, more importantly, over the typically very long life-span of the development. It is important therefore to ‘get it right first time’, by adopting a sustainable approach to resource use, energy-efficient design and to the minimisation of waste. This is encouraged by policies elsewhere in the LDF, but Supplementary Planning Documents such as a Design Guide could also be useful.

In addition, consideration should be given to producing a guide on Sustainable Construction, covering specifically matters such as reducing the use of minerals, recycling (and using recycled products), cutting energy and water consumption, minimising waste and CO2, both during the construction phase, but also, by design, over the decades or centuries of use that will follow.

To mitigate any local negative impacts on Air Quality, site specific policies and others should establish and encourage Affordable Housing In locations that will minimise car use and facilitate pedestrian/cycle access and the public transport.

The Policies and Quality of the Built Environment and Landscape

Affordable Housing presents an opportunity to create either a positive or negative impact on these Sustainability Objectives. To ensure that a positive impact is delivered, design matters are dealt with to some extent in policy CS 10, but a separate and more detailed design guide would also be useful.

Policy CS 7: Development Boundaries

Note: The SA of this Policy is focussed on a strategic overview of the policy concept, and is not an SA of each boundary or location proposed

SA Objective	Predicted effects	Nature of Effect(s)
Balanced Communities	+	A positive impact may be expected on this SA objective, for instance through encouraging regeneration and enhancement of viable communities by focussing development into those areas that need and can support it.
Access	+	The policy also supports communities to achieve or retain ‘Critical Mass’ – a point at which they will more self-sustaining and less dependent on travel. By seeking to contain development within viable centres, the policy makes integration between demand and provision of services more likely (i.e. by creating concentrated and hence commercially viable populations from the point of view of service providers – e.g. public transport, shops, schools, community centres etc.).
Housing	-/?	The policy may tend to have an unintentionally negative impact on this SA objective, as the restriction of sites will

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		inevitably make finding new plots harder for developers. This will not improve either the availability or affordability of business premises or housing.
		On the other hand, these issues and interests are safeguarded by other policies in the Core Strategy (e.g. CS5/6). The risk is in any event a necessary one in view of the many negative sustainability impacts of permitting wider development of the District.
Quality of the Built Environment	+ / ●	The policy is unlikely to have much direct impact on this Sustainability Objective. However, a minor positive impact might arise from the indirect promotion of higher densities.
Health	● / ?	The direct impact of the policy on this SA Objective is likely to be minimal. As an indirect consequence of the higher densities the policy promotes, there could be either negative or positive impacts – e.g. in terms of impact on crime, noise/light pollution etc. - The exact effects will depend on the strength of the policies governing design etc. and the robustness and vigilance of the development control regime.
Employment	+ / ?	Viewed purely in short-term employment and economic terms the policy could act as a brake on development in these areas, and therefore have a negative impact. On the other hand, in the longer term, the promotion the policy affords to higher density living. – Inherently more sustainable than the alternative – means that the overall effects on <i>sustainable</i> employment and economic growth are likely to be positive. See ‘Employment’ above.
Economic Growth	+ / ?	
Landscape	++	The policy will have a strongly positive effect on this sustainability objective.
Land and Soil Quality	+	The policy is likely to have a positive effect on this sustainability objective by encouraging higher density development.
Biodiversity	+	The policy is likely to have a positive effect on this sustainability objective by encouraging higher density development.
Historic Environment and Cultural Heritage	?	The policy will, through encouraging higher density and brownfield development, pose a challenge to this SA Objective. Much will depend on the quality of design guidance and of the development control regime.
Minerals	0	
Energy	+	The policy is likely to have a positive effect on this sustainability objective by encouraging higher density development, thereby facilitating the viability of local services and more sustainable transport modes.

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Air Quality	+ / -	The exact consequences of this policy for this SA Objective are hard to predict as much will depend on local circumstances. Local 'hot-spots' of higher density may experience air quality problems – e.g. from traffic. However, overall the policy should reduce car use (e.g. between settlements), leading to a positive contribution to global air quality and in particular CO2 reduction..
Waste	0	
Water	+/?	Living at higher densities may help promote efficiencies in water use.

Recommendations**The Policy and Quality of the Built Environment /
The Policy and Historic Environment and Cultural Heritage**

The policy represents an opportunity in both of these areas. Whether the sustainability effect is positive or negative will depend to a considerable extent upon the availability of SPD design guidance elsewhere in the LDF, and on the quality of local development control.

The Policy and Health / Air Quality

Again, the design of new development will be crucial here. In particular the creation of urban green spaces, including a requirement for tree and landscape planting as part of new development could help mitigate possible air quality problems.

Policy CS8: Areas of Outstanding Natural Beauty (AONB)

SA Objective	Predicted effects	Nature of Effect(s)
Balanced Communities	0	Protecting the high landscape quality areas, which form a large part of the District, may inadvertently and indirectly enhance their appeal for house-buyers and so indirectly help to maintain high house prices. The policy, were it not carefully worded, could therefore have an adverse impact on the objective of securing balanced communities. However, the wording does take account of social and economic well-being, so mitigating any potential obstacle to appropriately designed and sited Affordable Housing, which is supported by policies elsewhere in the LDF. Overall the effect should be neutral.
Access	+	The District's AONBs provide informal leisure and recreational opportunities for both locals and tourists. Safeguarding the resource helps ensure that this access is maintained into the future.
Housing	?	As with the 'Balanced Communities' SA objective outlined above, protecting the natural asset of AONBs may have paradoxical or unintended effects, for instance by inflating or maintaining house prices. Additionally, such areas are usually attractive to purchasers of second homes. South Hams has a high level of household spaces which are holiday homes

		(11.10%) The policy does take account of social issues; however, the issue of second homes might be one that could also be directly addressed as it impacts upon local housing affordability and availability.
Quality of the Built Environment	0	While design is covered under Policy CS10, consideration could be given to insisting on particularly high standards of design in this sensitive area. The use of local materials and building techniques is also important. Within the policy, in the supporting wording or elsewhere, it could be spelt out that higher than normal standards of design and or use of local materials and styles will be expected within AONBs. The use of such materials has other important sustainability benefits in addition to landscape ones – for instance the reduction in CO2 emissions used in transport and the creation or safeguarding of local skills and employment.
Health	+	Informal recreation and exercise, enjoyed by many visitors to the District’s AONBs, is an important component of a healthy lifestyle. This resource is safeguarded by the protection afforded under this policy.
Employment	+ / ?	The attractiveness of the AONBs helps create and safeguard jobs in tourism. Restrictions on development should be carefully imposed so that sites for employment continue to be available to ensure the economic viability of rural communities. The policy recognises this to some extent, but it will be important that other policies or SPDs take this forward, for instance by specifying appropriate employment uses for redundant farm buildings.
Economic Growth	+ / ?	See ‘Employment’ above. While protecting the visual and natural characteristics of the AONBs, it is vital to keep the areas economically alive, for instance by encouraging the growth of indigenous companies, and facilitating the diversification of traditional sources of employment. This could be done through other LDF policies and through specific economic development initiatives targeted at the areas.
Landscape	++	The policy will clearly support this Sustainability Objective
Land and Soil Quality	+	By restricting development in the AONBs the policy will tend to protect the agricultural land and soils they contain.
Biodiversity	+	Since the factors creating beauty and good quality habitat are frequently the same (trees, hedgerows, water, local geology, topography etc.) the policy will assist the protection of local Biodiversity by restricting inappropriate development. This is an important issue in South Hams where there are nationally important populations of species such as the Greater Horseshoe Bat and the Green Bush Cricket. The success or otherwise of this and other policies in this respect would be easier to judge were an adequate selection of reliable biodiversity indicators available.
Historic Environment and Cultural Heritage		As with Biodiversity, the policy will help safeguard local environmental assets such as geology. The built heritage is also likely to be safeguarded, especially

	+	in terms of the rural setting of many of the District's historic buildings.
		It is important to recognise however, that the buildings themselves grew directly from the local environment and owe some of their beauty and character to their use of local natural materials. Other policies or initiatives should stress the need to safeguard the availability of these.
Minerals	0 / ?	Consideration should be given as to the likely affect of this policy when determining applications for mineral extraction or working within the AONBs.
Energy	0 / ?	The policy is unlikely to affect energy use; however, consideration should be given to the need or likelihood of development proposals arising for renewable energy generation in the area. Given the potential conflict between Sustainability Objectives, this issue should be addressed. Although Policy CS 12 deals with Renewable energy, the principles as they apply specifically to the AONBs should be re-stated or made explicit here.
Air Quality	+ / -	Overall the policy is likely to protect local air quality. However, the very beauty of the area, preserved by the protection of this policy, is likely to generate a contribution towards Climate Change through CO2 emissions from visitor's cars. This could be mitigated through policies to encourage public transport access, or through compensatory carbon-fixing tree-planting.
Waste	0	The policy is unlikely to have any strong impact on this Sustainability Objective. However, Consideration should be given to amending the wording to facilitate the permitting of some local community recycling facilities. (See Recommendations, below).

Recommendations

The Policy and Housing

Consideration should be given to mentioning Second Homes in AONBs, either in the policy, supporting text or in other policies.

The Policy and Quality of the Built Environment.

The policy desires to protect local natural beauty, but it is important that this is not compromised by poor-quality development, especially when many traditional, historic buildings actually complement the natural beauty of the area.

Design issues take on an even greater importance in AONBS, and consideration should be given to mentioning these issues in the supporting text and linking them to policy CS10 and a more detailed explanation in a design guide.

The Policy and Biodiversity

Success of the policy in sustainability terms could more easily be measured in respect of Biodiversity, were an adequate set of indicators available.

The Policy and Historic Environment and Cultural Heritage

As above, the policy will generally support this Sustainability Objective. However, other policies or initiatives should take this further and stress the need to safeguard local materials.

The Policy and Minerals

The policy does not mention mineral extraction. If there are reserves in the areas affected, consideration should be given as to whether the wording acts against securing a necessary supply.

The Policy and Energy

Consideration should be given to modifying this policy to specifically mention the issue of renewable energy proposals, which might occur within AONBs (e.g. wind turbines)

The Policy and Waste

Consideration should be given as to whether the wording of the policy should be modified, perhaps as follows:

‘Development will only be permitted where it would support the area’s conservation, enhancement or **environmental protection.....**’

This would avoid any potential conflict between this policy and local community recycling facilities, which are needed to improve the level of recycling of domestic waste in the District.

Policy CS9: Coastal Preservation Area

SA Objective	Predicted effects	Nature of Effect(s)
Balanced Communities	●	As in AONBs, the protection of attractive areas such as the CPA may have the unintended consequence of maintaining high house prices e.g. by limiting any new supply. This could have a negative impact on this Sustainability Objective. However, the area involved is much smaller than the AONBs, and takes the form of a narrow strip. The affordable housing needs of the local community could therefore be met in areas just outside of the CPA. In practice any negative effect is likely to be minimal, and it may be considered to be a price worth paying for the protection of such a valuable natural resource.
Access	+	The District’s Coast provides informal leisure and recreational opportunities for both locals and tourists. Safeguarding the resource helps ensure that this access is maintained into the future.
Housing	●	Designation may help to keep existing property prices beyond the reach of many locals. Second Home ownership may also be high. However, because of the shape of the land involved, local needs could be met nearby, just outside the sensitive area. Second Home ownership of existing properties may be better tackled by means other than planning policy.
Quality of the Built Environment	0	Although design is covered by policy CS10, consideration could be given here to insisting on particularly high standards of design in this sensitive area, on the rare occasions when development is permitted. The use of local materials and building techniques is also important here. Within the policy, in the supporting wording or elsewhere, it could be spelt out that higher than normal standards of design and or use of local materials and styles will be expected within the CPA
Health	+	Informal recreation and exercise, enjoyed by many visitors to the District’s CPA, is an important component of a healthy lifestyle. This resource is safeguarded by the protection afforded under this policy
Employment	●	The attractiveness of the CPA helps create and safeguard jobs in tourism. It may be the case that much development pressure

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		from this source can be accommodated just outside the CPA and that therefore any negative impact of the policy on this Sustainability Objective will be slight.
Economic Growth	●	The policy allows for the traditional industries of agriculture and forestry, and it is probable that the economic needs of the area can be met nearby, just outside the more sensitive CPA.
Landscape	+	The policy will clearly support this Sustainability Objective
Land and Soil Quality	+	By restricting development in the CPA, the policy will tend to protect the agricultural land and soils it contains
Biodiversity	+	The policy will assist the protection of local Biodiversity by restricting development.
		The success or otherwise of this and other policies in this respect would be easier to judge were an adequate selection of reliable biodiversity indicators available.
Historic Environment and Cultural Heritage Minerals	+	The policy will help safeguard local environmental assets such as geology. It will also preserve the setting of historic buildings in the CPA.
Energy	0	
	0/?	The policy is unlikely to affect energy use; however, consideration should be given to the need or likelihood of development proposals arising for renewable energy generation in the area. While this is covered under policy CS 12, an explicit link could be made here.
Air Quality	+	Overall the policy is likely to protect local air quality. However, the very beauty of the area, preserved by the protection of this policy, is likely to generate a contribution towards Climate Change through CO2 emissions from visitor's cars. This could be mitigated through policies to encourage public transport access, or through compensatory carbon-fixing tree-planting.
Waste	0	The policy is unlikely to have any strong impact on this Sustainability Objective.

Recommendations**The Policy and Quality of the Built Environment**

Given the high quality of the area's landscape, consideration should be given as to whether higher standards of design and use of local styles / materials should be insisted on when development is permitted.

The Policy and Energy

Consideration should be given as to whether the policy should be expanded to take account of future proposals for renewable energy development.

Policy CS10: Design

SA Objective	Predicted effects	Nature of Effect(s)
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Balanced Communities	+	<p>Good design can have a positive effect here in terms of;</p> <ul style="list-style-type: none"> • assisting regeneration • helping to create a sense of community by confirming local distinctiveness and character. • facilitating social inclusion through enabling independent lifestyles for the elderly and those with disabilities- <p>This latter point could be specifically mentioned and would enhance the positive sustainability impact of the policy.</p>
Access	+	<p>A small positive effect may be expected on this SA objective, in terms of the potential for good design to reduce the isolation of people with limited mobility.</p>
Housing	0	
Quality of the Built Environment	+	<p>Good design is critical to a creating a high quality built environment, and this is reinforced by this policy. The specific mention of local character and the in-depth approach to it elsewhere in the LDF is especially welcome. However, the positive effect could be enhanced in a number of respects, including linking it with a SPD design guide. (see 'Recommendations')</p>
Health	+	<p>The effects on this SA objective are likely to be positive and significant, especially in terms of designing out crime. However, the positive effect could be enhanced through the specific mention of a number of key issues, such as the potential for design to securing space for informal recreation. (see 'Recommendations')</p>
Employment	•	<p>While it could be argued that good design enhances the appeal of an area to both businesses and their employees, the likely effect of this policy on this SA is likely to be minimal.</p>
Economic Growth	•	<p>As 'Employment' above.</p>
Landscape	+	<p>Good design is likely to have a moderate positive effect on this SA objective through helping to prevent harm to the overall quality of the landscape through poor design.</p>
Land and Soil Quality	0	
Biodiversity	0	
Historic Environment and Cultural Heritage	+	<p>The policy is likely to have a strongly positive effect on this SA objective, as good design of development is vital in preserving and enhancing historic buildings, their settings and the distinctive character of conservation areas. The effect could be enhanced by slightly modifying paragraph 6.35 (see 'Recommendations')</p>
Minerals	•	<p>The effect on this SA objective is likely to be minimal, however it could be enhanced in the supporting text. (see 'Recommendations')</p>
Energy	+/?	<p>The policy has the potential to have a strong positive impact</p>

		on this SA objective, not least because of the long-term nature of buildings and their consequently very great cumulative effect on CO2 emissions and hence climate change. But the importance of good design in securing needed improvements in energy efficiency is mentioned only in the supporting text. There is a specific energy efficiency policy elsewhere in the Core Strategy, however the challenge posed by climate change is so serious, and the emissions contribution of the country's building stock so great, that consideration should be given to specifically mentioning this issue in the policy itself (see 'Recommendations').
Air Quality	+	The policy is likely to have a moderate positive effect on local air quality, especially as it specifically mentions the need to create 'successful' outdoor areas. However, local air quality can be significantly improved through planting in these areas of trees. The positive effect could be enhanced through improvements in wording (see 'Recommendations')
Waste	+/●	The policy is likely to have a minimal, but probably positive effect on this SA Objective. The effect could be enhanced by a minor modification to the wording (See 'Recommendations')
Water	+/●	See 'Waste' above and 'Recommendations'

Recommendations

The Policy and Balanced Communities

If specific mention were made in the supporting text (e.g. paragraph 6.36) of the positive effect of good design on the needs of the elderly and those with disabilities, then this clarify and strengthen the policy. It would also strengthen the sense of 'ownership' of the plan by these groups in the community.

The Policy and Quality of the Built Environment.

The positive sustainability impact of the policy would be increased by specifically linking the policy with a SPD design guide

The Policy and Health

The specific mention of green spaces and space for informal recreation (where appropriate) would help enhance the positive sustainability effect of this policy, as would specifically mentioning some possibilities, such as walking and cycling.

Mention should also be made of the potential of good design to reduce negative impacts of noise and light and odour pollution which can have an indirect impact on health through quality of life and mental well-being.

The Policy and Historic Environment and Cultural Heritage

Modify paragraph 6.35 to specifically mention historic buildings Conservation Areas and their settings. Perhaps as follows. '...biodiversity **and cultural heritage** implications....'

The Policy and Minerals

It could be suggested in the supporting text that good design can include using recycled materials whenever possible. This reduces the demand for newly-extracted minerals, and is particularly appropriate in the case of historic buildings where such recycling, especially of local materials within developments, also supports the proper principles of 'Conservative Repair'.

The Policy and Energy

The challenge of climate change is so serious, and the emissions contribution of the country's building stock so great, that consideration should be given to specifically mentioning this issue in the policy itself (see 'Recommendations').

The Policy and Air Quality

Mention of the need to incorporate **green** spaces in paragraph 6.34 – i.e. with planting and trees - whenever possible, as this would help design in improvements in local air quality.

The Policy and Waste / Water

Modify wording paragraph 6.35, perhaps to '...energy efficiency, water and waste **reduction** arrangements..' This would stress the need for new development to actively change practice in a more sustainable direction.

Policy CS11: Infrastructure Provision

SA Objective	Predicted effects	Nature of Effect(s)
Balanced Communities	+	The provision of adequate infrastructure is essential for the realisation of this Sustainability Objective and the policy supports this.
Access	+	The policy strongly promotes this Sustainability Objective.
Housing	+	The provision of adequate infrastructure is essential for the realisation of this Sustainability Objective and the policy supports this.
Quality of the Built Environment	+	The provision of adequate infrastructure is essential for the realisation of this Sustainability Objective and the policy supports this.
Health	+	The provision of adequate infrastructure is essential for the realisation of this Sustainability Objective and the policy supports this.
Employment	+	The provision of adequate infrastructure is essential for the realisation of this Sustainability Objective and the policy supports this.
Economic Growth	+	The provision of adequate infrastructure is essential for the realisation of this Sustainability Objective and the policy supports this.
Landscape	0/?	The provision of new infrastructure, which the policy encourages, will have to be designed with care if a negative impact on this SA Objective is to be avoided. The provision of adequate guidance and of a quality development control regime will be essential.
Land and Soil Quality	0/?	The provision of new infrastructure, which the policy encourages, will have to be designed with care if a negative impact on this SA Objective is to be avoided. The provision of adequate guidance and of a quality development control regime will be essential.
Biodiversity		The provision of new infrastructure, which the policy

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	0/?	encourages, will have to be designed with care if a negative impact on this SA Objective is to be avoided. The provision of adequate guidance and of quality development control will be essential.
Historic Environment and Cultural Heritage	0/?	The provision of new infrastructure, which the policy encourages, will have to be designed with care if a negative impact on this SA Objective is to be avoided. The provision of adequate guidance and of quality development control will be essential.
Minerals	–	The demand for new infrastructure may increase demand for minerals, resulting in a negative impact on sustainability. This may be unavoidable, but would be reduced if recycled materials were used. The potentially negative sustainability impact of the policy on this SA Objective would be partially mitigated if recycled products were specified at the negotiation / legal agreement stages.
Energy	?	The exact impact on this SA Objective will depend on the type of infrastructure specified. For example, reductions could be achieved if public transport or cycle ways were built, on the other hand, new roads could increase energy use.
Air Quality	?	The exact impact on this SA Objective will depend on the type of infrastructure specified. For example, reductions could be achieved if public transport or cycle ways were built; on the other hand, new roads could increase energy use.
Waste	+	Should have a positive impact, but specifying community recycling facilities as infrastructure in the supporting text would help clarity.
Water	+	Likely to have a positive impact on this SA Objective.

Recommendations**The Policy and Minerals**

A negative impact on this SA Objective would be partially mitigated if recycled products were specified at the pre-application/negotiation/ legal agreement stages of the planning process. Guidance could be issued to developers and development control staff in this respect, or mention could be made in the supporting text.

The Policy and Waste

In paragraph 6.37. The addition of ‘community recycling facilities’ to the examples of ‘infrastructure’ would help make this aspect of achieving the sustainability objective clearer.

General: Consideration should be given to strengthening the policy, for instance a minor change in the wording as follows; ‘where existing infrastructure is inadequate, new or improved infrastructure and facilities should **always** be provided.’”

Policies CS12 and CS 13: Renewable Energy and Energy Efficiency

Note: As the sustainability issues raised by policies CS12 and CS13 are similar and are dealt with together in the Core Strategy, they are appraised here together

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SA Objective	Predicted effects	Nature of Effect(s)
Balanced Communities	0	Any negative impact in terms of increased costs on affordability is likely to be minimal (see 'Housing' below).
Access	0	
Housing	0	Improving energy conservation measures and encouraging small-scale renewables is unlikely to have such serious cost implications (relative to the existing costs which are mainly land-price related) as to have a serious negative impact on affordability. If there are any cost implications then these would be offset by lower running costs for property owners.
Quality of the Built Environment	?	The quality of the built environment need not necessarily be harmed by the installation of renewables, and is unlikely to be affected at all by energy conservation measures. However, even where some moderate level of impact is likely, it may be necessary to accept this in order to avoid the far worse potential consequences of climate change.
Health	0	The policy takes account of possible adverse noise impacts (e.g. from wind turbines) and the policy should not therefore have any negative impact on this SA Objective. Improved energy conservation measures (e.g. insulation / double or triple -glazing) may even help to reduce ambient noise impacts.
Employment	+	The policy's endorsement of renewable energy would support local and national jobs in the growing renewables industry – an area in which UK businesses lead the world. The same holds true for energy conservation measures such as cavity wall and other insulation.
Economic Growth	+	The policy supports sustainable economic development by facilitating diversification by local businesses into the environmental / energy conservation sectors. Planning obstacles have previously been identified as a major problem to the more widespread take-up of the available renewable energy technologies and this policy should help change that.
Landscape	- / ?	The potential exists for a negative impact on landscape, though this would mainly be something likely to occur only with major schemes, and might have to be accepted when weighed against the impact of climate change (or other generation alternatives such as coal or nuclear power, which may be worse). See a recent major study 'Wind Power' by the Sustainable Development Commission. 020 7238 4999.
Land and Soil Quality	●	Renewables are unlikely to significantly inhibit agricultural activity or damage soils.
Biodiversity	+/?	Unlike alternatives methods of power generation, significant negative impacts on wildlife are unlikely from renewables. It should also be remembered that climate change is likely to have far greater impacts. Overall, the likely long-term impact would be positive in terms of this SA Objective. Much would depend upon the particular proposal.
Historic Environment and Cultural	?	Historic buildings, their settings and Conservation Areas are more sensitive to visual intrusion. However, the heritage is itself the result of centuries of adaptation and piece-meal

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Heritage		addition in response to changing fashions and technologies. renewables are just one more example of this. Given the potential damage to the resource from climate change (e.g. major storms such as the October 1987 event) the careful incorporation of renewables and energy conservation into the historic fabric need not be excessively intrusive and should be regarded as responsible stewardship. Overall, in the long-term the effect could be positive.
Minerals	0	
Energy	++	The policy is likely to result in a positive sustainability impact in this area. Strengthening the wording would enhance this further.
Air Quality	++	Housing and industry constitute a major part of the country's CO2 emissions. The policy is likely to result in a positive sustainability impact. Strengthening the wording would enhance this positive impact further
Waste	● / +	Unlikely to be any significant impact unless renewable power is thought to include any form of power from waste, in which case the sustainability impact would be positive.
Water	+	The overall long-term effect of the policy in respect of this SA Objective is likely to be positive, as renewables are an effective long-term way of combating climate change and associated flood-risks.

Recommendations**Renewable Energy, Policy CS12, General:**

1. Climate change is one of the greatest challenges the District has ever faced. The potential negative impacts for both humans and biodiversity are considerable. These consequences should be spelt out so that the community can better understand, feel ownership of, and hopefully get behind the principle of the policy. For example in the District – e.g. flooding, storms (refer to data). An additional paragraph should be inserted by way of an introduction and explanation.

2. The potential positive sustainability impact of the policy (for example in the areas of Quality of The Built Environment, Energy / Air Quality) would be enhanced if the wording were amended, and the commitment to renewables consequently strengthened, by replacing 'minimal' in point 2 of the policy, with 'acceptable'. There may be some visual consequences of this technology, but the consequences of alternative forms of power generation, or of climate change, are likely to be worse overall from a sustainability point of view. Research has shown (*'Power To The People'* www.PlanningResource.co.uk) that the planning process can be a major obstacle to the take-up of the available technologies. The policy needs to be more strongly tilted in favour of renewables to help change this.

Energy Efficiency, Policy CS13, General:

The inclusion of definite targets and standards is an important strength of this policy in terms of strengthening its likely positive sustainability impact, and should definitely be retained.