

Your Area, Your Plan

A new plan for jobs, homes, shops and green spaces

Core Strategy Sustainability Appraisal Report

Autumn 2012



Introduction

1	Non Technical Summary	3
2	Sustainable Development	5
3	Sustainability Appraisal Process	6
4	Strategic Environmental Assessment	10
5	Local Plan	12

Sustainability Appraisal Scoping Stage

6	Stage A1: Identifying Other Relevant Policies, Plans Programmes and Objectives	14
	International	14
	National	14
	Regional	15
	Local and Sub Regional	15
	Summary	16
7	Stage A2: Collecting Baseline Data	17
	Calderdale Baseline Profile	17
8	Stage A3: Identifying the Sustainability Issues	18
	Summary of Issues	18
9	Stage A4: Developing the Sustainability Appraisal Framework	22
	Sustainability Objectives	22
	Compatibility of Sustainability Objectives	25

Sustainability Appraisal Framework

10	Sustainability Appraisal Framework	26
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Stage B: Sustainability Appraisal of the Refined Issues and Options

11	Stage B: Sustainability Appraisal of the Refined Issues and Options	41
11.1	Themes from Refined Issues and Options Appraisal	76

Stage C: Sustainability Appraisal of the Refined Issues and Options

12 Stage C: Sustainability Appraisal of the Core Strategy Preferred Options 79

Monitoring

13 Monitoring 135

1 Non Technical Summary

Purpose of the document

- 1.1** This document is the Sustainability Appraisal (SA) of the Core Strategy Preferred Options. The purpose of the SA is to inform the plan preparation process by appraising each of the Core Strategy's Objectives, Spatial Options, and Policy Options in relation to their sustainability, establishing their likely impacts, and the scope for mitigating any possible negative impacts.

What is meant by Sustainable Development?

- 1.2** The most commonly used definition of the concept of 'Sustainable Development' emerged from the Bruntland Report⁽¹⁾ in 1987, which described sustainable development as being 'development that meets the needs of the present, without compromising the ability of future generations to meet their own needs'. It is about ensuring a better quality of life for everyone now and for future generations.

How does the Sustainability Appraisal work?

- 1.3** 3.1 The SA is a key component of the Local Plan evidence base, ensuring that sustainability issues are addressed during the preparation of Local Plans. The SA is a technical document which assesses and reports on a plans potential impact on the environment, economy, and society. The SA carries out an assessment of the draft policies at various stages throughout the preparation of the Core Strategy, and does this by testing the potential impacts of the plan's objectives and policies against a SA Framework. This ensures that the potential impacts from the plan on the aim of achieving sustainable development are considered
- 1.4** There are a number of different stages to preparing a SA; these are listed in the table below. So far the council have consulted on stages A and B in 2007 and then again in 2008/9. This SA is the report produced at Stage D of the SA process.

Table 1.1 Summary of the Stages of the Sustainability Appraisal Process

Stage	Summary
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope.
Stage B	Developing and defining options, and assessing effects.
Stage C	Preparing the Sustainability Appraisal Report.
Stage D	Consulting on the preferred options of the DPD and Sustainability Appraisal Report.
Stage E	Monitoring the significant effects of implementing the DPD.

Source: Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, 2005

- 1.5** Following this round of consultation, the comments received on both the SA and the Core Strategy will be considered and inform the drafting of the Core Strategy and accompanying final SA Report in 2013.

1 Our Common Future: The World Commission on Environment and Development, WCED, 1987

4 Non Technical Summary

- 1.6** A full assessment of the predicted impacts arising from the Core Strategy Preferred Options is given in chapter 12. This reports that there are a number of potential positive or uncertain impacts that would occur if the preferred options policies were implemented. A small number of potentially negative impacts are also identified. However, it is considered that of the vast majority of uncertain or negative impacts suggested, the actual impacts would be largely dependent on the specific location and design of development, and these will be largely dealt with in the Land Allocations document.
- 1.7** A monitoring framework will be implemented as part of Stage E, to ensure that once adopted, the impacts from the Core Strategy can be monitored, in order that any adverse impacts are avoided or remedial action is taken.

How do I Comment on the Sustainability Appraisal?

- 1.8** The SA is published for comment alongside the Core Strategy preferred options document, and the public consultation runs from Friday 19th October 2012 until 5pm on Friday 14th December 2012. The SA is available to view online or in various council buildings, including Libraries and Customer First. Comments on the SA can be made electronically via the online consultation at www.calderdale.gov.uk or in writing to Calderdale Metropolitan Borough Council, Spatial Planning Team, Planning Services, Northgate House, Halifax, HX1 1UN.

Next Steps

- 1.9** Following the consultation on the Core Strategy preferred options and Sustainability Appraisal, comments received on both documents will be used to guide the preparation of the Draft Core Strategy which will be accompanied by the Final Sustainability Appraisal Report, both of which are likely to be published in 2013.

2 Sustainable Development

- 2.1** The most commonly used definition of the concept of ‘Sustainable Development’ emerged from the Bruntland Report⁽²⁾ in 1987, which described sustainable development as being ‘development that meets the needs of the present, without compromising the ability of future generations to meet their own needs’. It is about ensuring a better quality of life for everyone now and for future generations.
- 2.2** In 2005 the Government updated its sustainable development strategy,⁽³⁾ which set out 5 principles that aim to achieve sustainable development. These are:
- Living within environmental limits;
 - Ensuring a strong, healthy and just society;
 - Achieving a sustainable economy;
 - Promoting good governance; and
 - Using sound science responsibly.
- 2.3** The National Planning Policy Framework (NPPF) repeated the importance of the Local Plan in delivering sustainable development through local policies. The NPPF emphasises there are three strands to sustainable development; economic, social, and environmental.
- 2.4** In terms of an economic role, the NPPF requires the planning system to contribute to building a strong, responsive and competitive economy, by ensuring sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure. Concerning planning and its social role, the system should support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs, and support its health, social, and cultural well-being. The environmental role should contribute to protect and enhancing the natural, built and historic environment, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and secure climate change mitigation and adaptation measures, including the move to a low carbon economy.

2 Our Common Future: The World Commission on Environment and Development, WCED, 1987

3 Securing the Future, Delivering the UK Sustainable Development Strategy, HM Government, March 2005

6 Sustainability Appraisal Process

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3 Sustainability Appraisal Process

- 3.1 As part of the evidence base for the new Local Plan, the Council is required to prepare a Sustainability Appraisal (SA), in order to inform the development of new policies and objectives. This SA Report documents the process and how the SA has helped inform the development of the new Local Plan.
- 3.2 Undertaking SA during the preparation of the Local Plan ensures that sustainability considerations inform the development of the relevant plans. The purpose of the SA is to identify and report on the likely significant social, economic, and environmental impacts of a plan throughout its preparation, so that decisions can be made that accord with the objectives of sustainable development. Following the adoption of the plan, the SA is also used to monitor the plans' significant impacts and inform responses to adverse effects.
- 3.3 The SA methodology includes various stages, and the approach carried out is consistent with the approach outlined in the guidance expressed in the 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005).
- 3.4 Although since commencing work on the SA there has been a significant change in national level planning policy, the requirement remains to carry out a SA as expressed in the National Planning Policy Framework (NPPF), which states that a "Sustainability Appraisal which meets the requirements of the Strategic Environmental Assessment (SEA) should be integral part of the plan preparation process and should consider all the likely significant effects on the environment, economic, and social factors".

Stage A - Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage A1 - Identifying other relevant policies, plans, programmes, and objectives

- 3.5 The first stage of the Scoping exercise is to review other relevant policies, plans, and programmes. The purpose of this exercise is to establish and take account of any external social, economic, or environmental objectives at international, national, regional, sub-regional, or local levels that will inform the SA and therefore the development of the Core Strategy and Land Allocations and Designations DPDs.

Stage A2 - Collecting baseline information

- 3.6 The purpose of baseline data is to record and analyse data as the basis for predicting and monitoring effects of plans, alongside identifying sustainability problems and alternative ways of dealing with them. Baseline data establishes the current environmental, economic, and social conditions in the District. Trends can then be identified over time through the use of indicators and monitored to determine whether conditions are improving or deteriorating. The data provides a snapshot of the District as at September 2011 and will be constantly updated upon the production of subsequent plans and strategies.

Stage A3 - Identifying sustainability issues and problems

- 3.7 The identification of sustainability issues is an opportunity to establish key issues for the Core Strategy and to inform the development of the Core Strategy as well as to inform the development of the Sustainability Objectives; this task was carried out as part of the SA Scoping Report.

Stage A4 - Developing the sustainability appraisal framework

- 3.8 The purpose of the SA framework is to analyse the sustainability effects of the Core Strategy,

thereby assisting in determining the most sustainable options. The SA Framework consists of sustainability objectives, each of which have a set of related decision making criteria, indicators, and targets. The sustainability objectives provide a yardstick against which the social, environmental and economic effects of the plan can be tested, and in line with the ongoing nature of the SA, also provide a monitoring framework. An updated SA framework was published alongside the Core Strategy Refined Issues and Options in 2011.

Stage A5 - Consulting on the scope of the sustainability appraisal

- 3.9** In order to meet the requirements of the SEA, Natural England, English Heritage, and the Environment Agency were consulted on the scope of the SA back in 2008/2009. In addition to the statutory consultees, the scoping report was put out for public consultation alongside the Core Strategy Issues and Options, in an attempt to gain as many comments and input into the process as possible.

Stage B - Developing and refining options and assessing effects.

Stage B1 - Testing the Core Strategy preferred options against the SA framework

- 3.10** Initially, the Core Strategy Refined Issues and Options was tested against the SA framework in order to establish where there was conflict with the sustainability objectives; this helped in refining the plans objectives as well as developing preferred policies. The same exercise was then carried out against the Core Strategy Preferred Options document. Where there is conflict between the plans objectives and preferred options, the Council will be required to form a view on priorities.

Stage B2 - Developing the Core Strategy preferred options

- 3.11** In order that the plans objectives are achieved, carrying out an SA of the options can help show how the plan could improve the existing situation compared to how the area would develop if there was no plan. The development of the Core Strategy preferred options, and subsequently the Core Strategy submission document will be the result of a process that has been repeated at each stage of preparing the plan, as the objectives and policies are refined as a result of the SA.

Stage B3 - Predicting the effects of the Core Strategy preferred options

- 3.12** This stage establishes the predicted social, environmental and economic effects of the options being considered in the Core Strategy. Task B3 has been carried out alongside tasks B4 and B5.

Stage B4 - Evaluating the effects of the Core Strategy preferred options.

- 3.13** Once the predicted effects of the preferred options have been established, an evaluation of the significance of these should be made. This is achieved in assessing each of the individual objectives and policies, and where a potential effect is predicted, a judgement needs to be made as to its significance. In order to meet the SEA requirements, the judgement on whether the effect will be significant is made with the following in mind:

- Probability;
- Duration;
- Frequency;
- Whether the effect could be reversed;
- Secondary;
- Cumulative;
- Combined effect with other elements of the plan;

8 Sustainability Appraisal Process

Extent of the effect;
Spatial extent.

3

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Stage B5 - Considering ways of mitigating adverse effects and maximising beneficial effects.

- 3.14** The SA report is required to include measures to prevent, reduce or offset significant negative impacts from implementing the Core Strategy. Mitigating potential negative impacts and maximising positive outcomes are dependent on the scope of the policy being appraised. This will be documented in the final SA report published alongside the Draft Core Strategy in 2013.

Stage B6 - Proposing measures to monitor the significant effects of implementing the Core Strategy.

- 3.15** Monitoring the actual effects of implementing the Core Strategy needs to be carried out and analysed, and compared with those predicted in the SA. The information gathered from monitoring will assist in producing the subsequent Local Plan monitoring reports.

Stage C - Preparing the SA Report

Stage C1: Preparing the Sustainability Report

- 3.16** The SA Report on the Core Strategy preferred options is a key output of the overall SA process, although this SA Report is considered as an 'interim' report rather than the final SA report which will be published alongside the Draft Core Strategy in 2013, as changes to the Core Strategy are likely to be necessary following comments received during the preferred options consultation (both on the Core Strategy and the SA itself) which will need to be subject to the SA process.
- 3.17** The SA Report presents information on the effects of the plan, clearly showing the relationship between the Core Strategy and the SA itself. It must show how the SEA requirements have been met, and will include a 'Non technical summary'. It is necessary to bear in mind that the SA report is a public consultation document, and therefore consideration needs to be given as to the level of detail and length of the document.

Stage D - Consulting on the preferred options and the Sustainability Appraisal Report

Stage D1 - Public participation on the Core Strategy preferred options and the SA report.

- 3.18** The SA Report on the preferred options will be made available for public consultation during the Core Strategy preferred options consultation.

Stage D2 (i) - Appraising significant changes

- 3.19** The next stage of plan preparation following the Core Strategy preferred options will be to prepare a Draft Core Strategy for submission to the government. Should there be only minor changes to the Core Strategy preferred options prior to submission, a further SA would not be required, although this could be discussed in an update to the SA report.
- 3.20** Alternatively, should the submission document contain strategy or policies that were either not included in the preferred options or significantly different to those presented in the preferred options, it will be necessary to carry out a SA of the changes and document this in a final SA report.

Stage D2(ii) - Appraising significant changes resulting from representations

- 3.21** As a result of the examination, the inspector will produce a report which will document whether

the plan is considered 'sound'. Where there are significant changes proposed, the inspector will need to be satisfied that sufficient SA material is available to show what the significant effects would be. The council must then incorporate the changes required, amend the SA report and adopt the plan.

Stage D3 - Making decisions and providing information

- 3.22** The council will publish an adoption statement to accompany the adopted Core Strategy, which will set out how the findings of the SA process has been taken into account. The summary must provide enough information to make clear any changes made to the Core Strategy as a result of the SA process and responses to consultation, or the reasons why no changes were made or options were rejected.

Stage E - Monitoring the significant effects of implementing the Core Strategy

- 3.23** The Core Strategy will be monitored in order that any significant effects of implementing the plan will be identified at an early stage to avoid adverse effects, and to carry out appropriate remedial action.

Progress so Far

- 3.24** The Council produced a Generic SA Scoping Report in early 2007 to support the Sustainability Appraisals of all the Development Plan Documents (DPD) or Supplementary Planning Documents (SPD) that were intended to be prepared as part of the Local Plan. The Generic SA Scoping Report was subject to consultation from the following organisations:

The Environment Agency;
English Heritage;
Natural England;
West Yorkshire Ecology
Calderdale Sustainability Forum;
Calderdale Friends of the Earth;
Calderdale Forward.

- 3.25** Following the generic SA scoping report, an updated version was prepared and consulted on alongside the Core Strategy Issues and Options in winter 2008/9. This was to ensure the scoping report remained as up to date as possible, and the review meant that new national policies, indicators, data, and amendments / additions to the sustainability objectives were all taken into account. Details of the Scoping Report can be found on the Council's website at www.calderdale.gov.uk
- 3.26** The feedback from the winter 2008/9 SA Scoping Report consultation then informed an update of the SA Framework, which was published for information alongside the Core Strategy Refined Issues and Options consultation at the beginning of 2011.
- 3.27** Through consulting on the SA Scoping Report, organisations and individuals have helped ensure the relevant sustainability information is included to produce a robust and comprehensive SA Report on the preferred options that will be consulted on alongside the Core Strategy Preferred Options. Although stages A1 - A5 were carried out for the Scoping Reports in 2007 and 2008/9, they are updated for the SA Report.

10 Strategic Environmental Assessment

4 Strategic Environmental Assessment

4

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- 4.1** The EU Directive 2001/42/EC⁽⁴⁾ requires any plan or programme that may have significant effects on the environment to be formally assessed by a Strategic Environmental Assessment (SEA). However, in order to reduce duplication, the Government recommends that SA and SEA are carried out in one single appraisal process.
- 4.2** For the purposes of this report therefore, the term 'Sustainability Appraisal' includes the environmental requirements of the SEA.
- 4.3** The table below is included to demonstrate the sections in the SA where the SEA requirements have been met and documented accordingly; some of the requirements will be developed as part of the Final SA Report that will accompany the draft Core Strategy in 2013.

Table 4.1 Strategic Environmental Assessment Requirements and SA Process

SEA Directive Requirements	Where Covered in the SA Process
Preparation of Environmental Report (Art. 5 and Annex I)	
A) An outline of the contents, main objectives of the plan or programme, and relationships with other relevant plans and programmes	Section 5 - The Local Plan Section 6 - Identifying other relevant policies, plans, programmes and objectives. Calderdale Sustainability Appraisal Scoping Report 2008/9 Appendix 1 of the Sustainability Appraisal 2012 Report - Other Relevant Policies, Plans and Programmes.
B) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 7 - Collecting baseline data. Appendix 2 of the Sustainability Appraisal 2012 Report - Baseline Data
C) The environmental characteristics of areas likely to be significantly affected	Section 7 - Collecting baseline data. Section 11 - Sustainability Appraisal of the Refined Issues and Options Section 12 - Sustainability Appraisal of the Preferred Options Appendix 2 of the Sustainability Appraisal 2012 Report - Baseline Data
D) Any existing environmental problems which are relevant to the plan including, in particular those relating to any areas of particular environmental importance.	Section 7 - Collecting baseline data. Section 8 - Identifying the sustainability issues Appendix 2 of the Sustainability Appraisal 2012 Report - Baseline Data
E) The environmental protection objectives established at international community or national level, which are relevant to the plan	Section 6 - Identifying other relevant policies, plans, programmes and objectives.

4 European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

SEA Directive Requirements	Where Covered in the SA Process
or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	<p>Calderdale Sustainability Appraisal Scoping Report 2008/9</p> <p>Appendix 1 of the Sustainability Appraisal 2012 Report - Other Relevant Policies, Plans and Programmes.</p> <p>Section 11 - Sustainability Appraisal of the Refined Issues and Options</p> <p>Section 12 - Sustainability Appraisal of the Preferred Options</p>
F) The likely significant effects on the environment, including issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	<p>Section 9 - SA Objectives</p> <p>Section 11 - Sustainability Appraisal of the Refined Issues and Options</p> <p>Section 12 - Sustainability Appraisal of the Preferred Options</p> <p>To be concluded in the Final Sustainability Appraisal Report (2013)</p> <p>Sustainability Appraisal Worksheets to be included in the Final Sustainability Appraisal Report (2013).</p>
G) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	<p>Section 11 - Sustainability Appraisal of the Refined Issues and Options</p> <p>Section 12 - Sustainability Appraisal of the Preferred Options</p> <p>Recommendations for mitigation and Cumulative impacts to be concluded in the Final Sustainability Appraisal Report (2013)</p>
H) An outline of the reasons for selecting the alternatives dealt with, and description of how the assessment was undertaken including any difficulties.	<p>Section 11 - Sustainability Appraisal of the Refined Issues and Options</p> <p>Section 12 - Sustainability Appraisal of the Preferred Options</p> <p>Recommendations for mitigation to be concluded in the Final Sustainability Appraisal Report (2013)</p>
I) A description of measures envisaged concerning monitoring in accordance with Article 10.	Section 13 Monitoring -To be concluded in the Final Sustainability Appraisal Report (2013)
J) A non-technical summary of the information provided against the previous headings	Section 1 - Full summary to be published in the Final Sustainability Appraisal Report (2013)

5 Local Plan

- 5.1 The Local Plan will be made up of two key Development Plan Documents (DPD), the Core Strategy, and the Land Allocations document.
- 5.2 The Core Strategy is the key planning document within the new Local Plan to be prepared. It will set the scene for the next 15 years, provide planning policies, guidance and broad locations for new developments whilst protecting the environment, addressing climate change and the myriad of infrastructure, economic, environmental and social factors that help shape a place. The main requirements for a Core Strategy are:
- An overall vision which sets out how the area and the places within it should develop;
 - Strategic Objectives for the area focusing on the key issues to be addressed;
 - A delivery strategy for achieving these objectives;
 - Clear arrangements for managing and monitoring the delivery of the strategy.
- 5.3 The Core Strategy is required to go through a number of public consultations prior to being submitted to the Secretary of State and the Independent Examination by the Planning Inspectorate. So far, the Core Strategy has been through the 'Issues and Options' stage in November 2008 - January 2009, and a 'Refined Issues and Options' stage January to March 2011. Both these documents, along with the feedback from the consultations are available to view online at www.calderdale.gov.uk
- 5.4 This SA report documents how sustainability issues were taken into account whilst preparing the Core Strategy Preferred Options; firstly the appraisal of the Refined Issues and Options which informed the development of the Core Strategy Preferred Options, the assessment of which forms the second part of the SA document. In carrying out the SA of the Preferred Options, the following elements were appraised:
- the Core Strategy Strategic Objectives;
 - the Spatial Option;
 - Core Policies;
 - Thematic Policies; and
 - Area Based Policies.
- 5.5 The Core Strategy Preferred Options is underpinned by a spatial vision and a set of strategic objectives. The proposed Spatial Vision is as follows:

Calderdale in 2030 is a great place to live, work, invest and visit, which has capitalised on its strategic position between Leeds and Manchester within metropolitan northern England, managing growth, change and the needs of its people within its precious Pennine Environment.

- 5.6 The Core Strategy Strategic Objectives link the Core Strategy's Spatial Vision with the detailed Core, Thematic, and Area based policies. There are 10 in total and are as follows:

Table 5.1 Core Strategy Strategic Objectives

Title	Objective
SO1 - Sustainable Development	To follow the principles of sustainable development in the location and design of all new and refurbished development and associated infrastructure.
SO2 - Climate Change	Ensuring benefits to people, the environment and the economy are secured through addressing the causes of climate change, whilst adapting to its impacts
SO3 - Economy and Enterprise	Create a resilient sustainable economy founded upon innovation and enterprise; building upon the exceptional character of Calderdale and our location within Leeds City Region and proximity to Manchester.
SO4 - Housing	To meet the district's housing needs through the provision of a range of good quality dwellings of varying types, sizes and prices in sustainable locations utilising sustainable building methods and maximising the use of brownfield land, together with more efficient use and improvement of the existing housing stock.
SO5 - Green Infrastructure and the Natural Environment	To protect and enhance green infrastructure and the natural environment in Calderdale for its contribution to landscape, biodiversity, sport and recreation and its value for well being and health
SO6 - Historic Environment and Design	To conserve the District's heritage assets, maximising their contribution to the wider economic and social objectives of the plan, and to ensure that new development and investment helps to improve and reinforce the local character and identity of Calderdale's communities through high quality, inclusive design.
SO7 - Transport	To ensure the provision of a sustainable, safe and efficient transport system which reduces the need to travel, supports and promotes economic growth and minimises any adverse effects upon the environment and communities
SO8 - Communities and Narrowing the Gap	Work to ensure that the differences in health, quality of life and economic prosperity between different communities in Calderdale reduce.
SO9 - Minerals	To ensure a sufficient and sustainable supply of minerals, including through appropriate safeguarding, having regard to the need to encourage the efficient use and recycling of minerals, minimising the environmental and social impacts of mineral workings, and promote restoration of mineral sites that provide a beneficial after use.
SO10 - Waste	To plan for sufficient waste management facilities in sustainable locations, minimising transport impacts, and managing waste as a resource in order to minimise the amount sent to landfill.

5.7 The Land Allocations document will be the second part of the Local Plan to be prepared, and will allocate specific sites for development and protection. Since the Land Allocations is required to be in conformity with the Core Strategy, it is being prepared slightly behind the Core Strategy, with an Issues and Options stage unlikely to take place before the summer of 2013. Following a number of public consultations at various stages the timetable for adoption of the second part of the Local Plan is Winter 2015. Like the Core Strategy, the Land Allocations document will be subject to SA.

6 Stage A1: Identifying Other Relevant Policies, Plans Programmes and Objectives

Stage A1 - Identifying Other Relevant Policies, Plans, Programmes, and Objectives

- 6.1** The first stage of Scoping is to review other relevant policies, plans, and programmes. The purpose of this exercise is to establish and take account of any external social, economic, or environmental objectives at international, national, regional, sub-regional, or local levels that will inform the SA and therefore the development of the Core Strategy and Land Allocations plans.
- 6.2** A review of documents at the international, national, regional, sub-regional and local level was undertaken based on those suggested in the Government's guidance.⁽⁵⁾ The key objectives relating to sustainability were noted, along with the implications for the Core Strategy and Land Allocations, and the SA.
- 6.3** However, for the two elements of the Local Plan, it is assumed that most of the international level plans have already been fed into national plans and strategies. Therefore, only the most relevant international policy documents will be reviewed, with the more detailed implications and links to policies and programmes beginning at the national level.
- 6.4** Given the amount of time that has lapsed between the SA scoping report and the Core Strategy preferred options, an updated review of relevant documents was carried out. A full listing can be viewed in Appendix 1 of the SA on the Council's website at www.calderdale.gov.uk

International

- 6.5** At an international level, the Johannesburg Declaration on Sustainable Development, the European Spatial Development Perspective, the EU directive on SEA and various EU Directives concerned with the environment will drive key sustainability issues. However, these documents have not being reviewed at length as they have been incorporated into national level documents that inform national planning policy.

National

- 6.6** Nationally, planning policy is now set out within the National Planning Policy Framework (NPPF). The NPPF replaced a whole suite of Planning Policy Guidance and Planning Policy Statements, although the requirement to carry out a SA remains. The NPPF sets out the purpose of the planning system is to contribute to the achievement of sustainable development, and that at the heart of the planning system is a presumption in favour of sustainable development. There are however a small number of national planning policies that have not been replaced by the NPPF, for instance 'PPS 10: Planning for Sustainable Waste Management' remains in force.
- 6.7** Other national level documents reviewed include the UK Government's Sustainable Development Strategy 'Securing the Future', which outlines the government's main sustainability principles to be accounted for in developing policies. Acts, Reports and Plans on topics such as climate change, transport, the natural environment and biodiversity, sustainable communities, are included, alongside the urban, rural, and energy white papers.

Regional

- 6.8** Since the Coalition government came into power, they have made it clear their intention to devolve power to the local level; as a result, many of the regional bodies with planning related functions have ceased to exist. However, some of the documents they produced still hold relevance or are required to be considered until formally revoked.
- 6.9** The Regional Spatial Strategy (RSS) provided the main policy framework at the regional level, although the government intends to revoke the RSS following the passing of the Localism Bill. The impacts from revoking the RSS plans are currently being assessed through a Strategic Environmental Assessment (SEA).
- 6.10** Other regional level strategies have also been reviewed, and , although some were prepared prior to the Localism Bill and the NPPF, some of the high level objectives and principles remain relevant. There are also a number of documents and strategies at a Leeds City Region(LCR) level, for instance the LCR Development Programme, and the LCR Green Infrastructure Strategy. More recent Yorkshire and Humber level documents reviewed include a recent study on Low Carbon and Renewable Energy Capacity in Yorkshire and Humber.

Local and Sub Regional

- 6.11** The Replacement Calderdale Unitary Development Plan (RCUDP) was adopted in 2006. Under the transitional arrangements contained within the 2004 Planning and Compulsory Purchase Act, certain policies in the plan were saved in 2009 and remain in place until replaced by the Core Strategy or the Land Allocations document. The Sustainable Community Strategy, 'The Futures Plan 2006-16' sets out six priorities, which together with Corporate Plan 2006-9 and the new Local Area Agreement (2008) also informed the development of the sustainability objectives.
- 6.12** With changes in governance of health services, the Sustainable Community Strategy will be replaced by the forthcoming Wellbeing Strategy, which the SA will need to reflect. The Wellbeing Strategy is due to be completed in Autumn 2012, and will focus on a small number of high level priority outcomes. The draft 'priority outcomes' at present are to ensure that Calderdale is a place:
 - where people have good health;
 - with a balanced and dynamic local economy;
 - where fewer children under the age of 5 live in, and are born into, poverty;
 - where children and young people are ready for learning and ready for life;
 - where older people live fulfilling and independent lives;
 - where everyone has a sense of pride and belonging based on mutual respect
- 6.13** A raft of local and sub regional evidence base reports exist, all of which will inform the development of policies and which the SA will draw upon, and, where relevant, aim to support specific objectives or targets. These include:
 - A Strategic Flood Risk Assessment (SFRA);
 - Renewable energy studies;
 - West Yorkshire Local Transport Plan;
 - Local Climate Change Impact Profile;
 - Employment Land Review;
 - Strategic Housing Land Availability Assessment (SHLAA);
 - Settlement Hierarchy;
 - Spatial Atlas;

Transport Studies;
Climate Change Strategy.

- 6.14** Calderdale's Strategic Housing Market Assessment 2011 (SHMA) contains information on the current housing needs in the District, and the housing requirements study will provide a basis for arriving at a proposed housing requirement for the Local Plan. The Economy and Enterprise Strategy, and the Employment Land Review provide economic information, whilst the Biodiversity Action Plan includes targets for habitat creation and the protection of wildlife, flora and fauna. In terms of achieving carbon reductions, the Energy Future Strategy aims to achieve a 40% reduction in carbon emissions by 2020 based on 2005 levels. The Local Plan therefore is a key part to provide the framework to secure such reductions. In order to ensure that health matters are considered throughout the plan, the SA has included relevant aspects of the council's Health Impact Assessment.
- 6.15** Neighbouring authorities' Local Plans, and other emerging Local Plan documents will need to be regularly reviewed in order to take account of the potential sub-regional impacts of policies.

Summary

- 6.16** The full listing of documents reviewed, together with a summary of the objectives and implications relevant to the Core Strategy and SA framework is included in Appendix 1 'Other Relevant Plans, and Programmes', which can be viewed on the council's website at www.calderdale.gov.uk. A summary of the main issues arising from the document review is given below:

Ensure issues on climate change influence policies in all plans;
There is a need to reduce disparities across the district in relation to health, income levels and social inclusion;
Plan to direct most development towards brownfield land;
Avoid dispersal from where people live, work, and access services;
Ensure accessibility is a key consideration in planning for new development together with reducing the need to travel and reducing dependence on the private car;
Enhance the local economy by working with business to develop an environment in which they prosper;
Improve people's quality of life by promoting economic growth and increasing skills;
Build on the location and exceptional character of Calderdale;
Include policies to protect and regenerate the vitality and viability of town and district centres;
Protect and enhance Calderdale's built heritage and features of historical importance;
Include policies to protect and enhance biodiversity;
Apply the waste hierarchy to planning policies;
Ensure as far as practicable, the prudent, efficient and sustainable use of minerals;
Increase access and availability of open space and other recreational and sports facilities;
Respond to the need to increase the proportion of energy derived from renewable sources and from decentralised sources;
Consider what policies are required to prevent pollution of air, water and land, and clean up areas that are polluted together with measures to reduce nuisance such as noise and light pollution;
Consider policies on water demand and capacity.

7 Stage A2: Collecting Baseline Data

Calderdale Baseline Profile

- 7.1** The purpose of baseline data is to record and analyse data as the basis for predicting and monitoring effects of plans, alongside identifying sustainability problems and alternative ways of dealing with them. Baseline data establishes the current environmental, economic, and social conditions in the District. Trends can then be identified over time through the use of indicators and monitored to determine whether conditions are improving or deteriorating. The data provides a snapshot of the District and will be constantly updated upon the production of subsequent plans and strategies.

Collecting the Baseline Data

- 7.2** A review of a wide range of data sources was undertaken based on government guidance,⁽⁶⁾ together with other relevant sources of information. Much of the baseline information is generic to the District to cover the strategic requirements of the Core Strategy and Land Allocations plans, although the final SA report of the Land Allocations plans is likely to reflect more specific issues related to the locations and designations of the allocated land. Consistency between the SA Indicators and other Council monitoring indicators will ensure that monitoring the impacts of the plan will be made easier as the data will be regularly updated.
- 7.3** Appendix B 'Baseline Data' (www.calderdale.gov.uk) provides a full listing of the entire baseline data collected for the purpose of this scoping report, including indicators, and targets (where established). Stage A3 provides a summary of the sustainability issues that emerge as a result of the baseline data collection and Task A1, sub divided into economic, social and environmental information.

18 Stage A3: Identifying the Sustainability Issues

8 Stage A3: Identifying the Sustainability Issues

Summary of Issues

8

Identifying the Sustainability Issues - Task A3

- 8.1** The local authority is already aware of many sustainability issues affecting the district from previous plan work, particularly from the preparation of the evidence base for the Local Plan. Others have emerged through the document review (Task A1) and collection of baseline data (Task A2). As more information is fed into the baseline data, and fewer data gaps exist, other issues may start to emerge.

Summary of Issues

Social

- 8.2** In terms of the social elements of sustainability, the issues are concerned with housing, safety and security, inclusive communities and good health, improving accessibility to services and facilities, and providing education and training opportunities. Calderdale has a higher percentage of owner occupied dwellings when compared with either West Yorkshire or England, although it has a lower percentage of social housing. In relation to the quality of the housing stock, nearly one fifth of households are without central heating, and the Calderdale Housing Strategy (2012-17) estimates that 15-25% of all households experience fuel poverty. Approximately 16% of private sector dwellings were considered not to meet the Decent Homes Standard, whilst average lower quartile house prices were lower than West Yorkshire or England and Wales as a whole.
- 8.3** Good design will enhance not just the built environment but the spaces inbetween. Policies therefore need to ensure that development designs out crime, or the opportunities for crime. Initiatives such as 'Secure by Design' help improve buildings security, whilst improving the layout of developments can also help reduce the numbers of road casualties. In relation to offences committed, Calderdale has a higher overall number of offences per 1000 population (45/1000) than England and Wales (41/1000), but slightly fewer than West Yorkshire (50/1000), violence against the person is lower than both West Yorkshire or England & Wales, and the number of burglary offences per 1000 population (6/1000) were higher than the national figure (5/1000) but higher than the regional level (9/1000). In 2010 there were 29 recorded cyclist road accident casualties, and 80 pedestrian road accident casualties.
- 8.4** The health of the population is monitored as part of the SA, reflecting the important role planning can play in providing the opportunities for people to improve their health, through protection and enhancement of open spaces, provision of safe, attractive green infrastructure networks that can increase pedestrian and cycling numbers, and allocating land for the health service facilities. In terms of the issues emerging from the data review, there are a number of key issues that Local Plan will need to address as part of a strategic approach to improving the populations health. Life expectancy is lower than either the region or the UK, whilst infant mortality rates (7.53 per 1000 live births) are higher than the region (5.48) and the national figure (4.69). It is estimated that 18.4% of the population have a limiting life long term illness, which is less than the region (18.8%) but higher than the national figure of 17.9%. The Calderdale Health Profile (2011) states that the levels of obesity in year 6 children are 17.4%, which is lower than the national figure (18.7%), although the levels of obesity in adults is 27% locally compared to 24.2% nationally. The district's average national ranking in the Indices of Deprivation is 110 (1 being the least deprived, 326 the most deprived), and there are pockets of deprivation in various parts of the district. For instance parts of the Park ward are within the most deprived 3% areas of England. The least deprived areas tend to be focused on the more rural areas, or smaller settlements such as parts of Hipperholme, Lightcliffe,

Greetland, and Stainland.

- 8.5** In the Places Survey 2008, 78% of people were satisfied overall with the local area as place to live, and approximately two thirds of those questioned believed that people from different backgrounds get on well together in their local area. The Calderdale Physical Activity Strategy (2010/2011) estimated that around 25% of adults achieve three 30 minutes of sport per week. Accessibility to facilities and employment is an issue, although this varies across the district. The percentage of 16-18 year olds not in education, employment or training (6.4%) is lower than the region (7.2%) or England (7.30%) as a whole, and the percentage of people of working age with no formal qualifications (10.4%) is lower than either the region (12.8%) or the national figure (11.3%).

Environmental

- 8.6** There are a number of environmental based issues that emerged as part of the scoping and baseline data exercise. The retention, protection and creation of a locally distinctive built environment means that it is important to ensure that a green infrastructure network provides a network that ensures green space is accessible to everyone. The district has 7 parks that have been awarded the Green Flag award, and therefore it is important to protect and maintain these. There are over 2,000 listed buildings within the district, and 27 Conservation Areas, highlighting the rich built heritage history that exists in Calderdale, therefore the identity and distinctiveness of villages and towns need protecting.
- 8.7** Reducing the impact of transport on the environment is a significant part of reducing carbon emissions and addressing climate change. Compared to neighbouring authorities or national figures, car use for commuting is higher in Calderdale, and cycling to work numbers are lower than nationally. Increasing sustainable forms of travel will rely partly on ensuring the green infrastructure networks provide routes that make walking and cycling attractive. Although there are no local level figures for bus and train use, figures from the West Yorkshire Local Transport Plan show that in 2011 there was 184.7 million bus journeys in West Yorkshire, and 27 million rail journeys. The Leeds City Region Connectivity Study identified that Calderdale has poor connection by rail to other parts of the city region. There are a number of constraints on the line including the number of single line sections especially at junctions and slow maximum line speeds. The Local Plan must identify the infrastructure required to make non car travel a realistic alternative.
- 8.8** The impacts of climate change require the district to ensure it has a Local Plan in place that promotes adaptation and mitigation. One of the major aspects of adaptation is concerned with flood risk. Residents and business have recently experienced significant damage and disruption to property following the floods of summer 2012. The Local Plan will be required to address both strategic level flood risk issues, and in the Land Allocations document site specific issues as well. It will be of extreme importance that new development avoids placing further pressures on infrastructure and water flows.
- 8.9** Water quality is also a relevant indicator for the Local Plan. The percentage of river and canal length where the water is deemed to be of 'good' quality in relation to chemical levels was 82%; in relation to biological levels the percentage was 52%. The target is that by 2015 100% of water bodies meet 'good' ecological status.
- 8.10** Mitigation aspects include the reduction of greenhouse gas emissions. The total carbon dioxide emissions per capita in Calderdale in 2010 was measured at 6.6 tonnes. The Calderdale Energy Futures Plan aims for a 40% carbon emission reduction by 2020 compared to 2005 levels. Further issues on air emissions can be evidenced by the fact the district has 6 Air Quality Management Areas designated. Reducing the levels of traffic will be a factor in reducing the level of air pollution.

20 Stage A3: Identifying the Sustainability Issues

- 8.11** Energy use and efficiency is another approach to mitigation. Planning can help secure greater energy efficient new development, although it has limited influence on existing properties. The average annual domestic electricity usage is lower than the national average but higher than the region, but the average annual gas consumption is higher than either the region or the national figure. One way of securing greater energy efficiency is from the generation of renewable energy, such as wind, solar, or hydro. An area of growing interest is for Combined Heat and Power (CHP) units, which make use of what otherwise would be wasted heat. CHP units can also be part of a District Heating Network, so, rather than powering just one building or space, it can be part of a heating network for a number of buildings. Overall, the amount of energy generated from renewable and low carbon sources needs increasing.
- 8.12** The district has large areas of locally, nationally and internationally protected nature conservation sites. The Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest (SSSI) must be protected and enhanced. The latest assessment of SSSI's show some areas are in an 'Unfavourable but Recovering' condition. Much of the district is covered by Green Belt or Special Landscape Areas, although the Green Belt will be reviewed as part of the Local Plan preparation. Other natural environment issues include the generally poor quality of agricultural land in Calderdale, with the highest grade being 3 (1 being the best, 5 being the worst), and the relatively low level of woodland cover.
- 8.13** As well as energy, there are sustainability issues concerning other resources, such as land. The district has a number of quarries that extract sandstone and to a lesser extent clay and shale. Mineral extraction is a temporary land use, and it is important that once extraction is completed, the site is restored back to a beneficial use. Recycled aggregates play an increasing part in the construction industry today. Locally quarried stone contributes to a locally distinctive built environment, although the environmental and social impacts of mineral extraction need to be minimised. The percentage of new housing completions on brownfield land stood at 95% in 2011/12, and although the NPPF has removed a brownfield target the priority for focusing development on brownfield land remains. It was estimated that there were approximately 2,000 dwellings that had been empty for more than 6 months, and a further 120 classed as unfit for habitation. In addition, there were approximately 1,000 dwellings empty since the death of the last resident, or classed as second homes. Another aspect of using land and resources efficiently is ensuring that high quality sustainable design is achieved, as this will avoid unattractive residential and employment environments, attracting both residents and employers alike.
- 8.14** Considering waste as a resource is a necessity as a result of the need to reduce the amounts of waste ending up in landfill. In 2011, the amounts of household waste collected per head (381kg) was lower than the regional average (436kg) and the national average (395kg). Although dry recycling levels were higher than both the region or nationally, the levels of composting were lower and the landfill rate was higher.

Economic

- 8.15** As of August 2011, the number of Job Seekers Allowance claimants as a percentage of the working age population was higher than the regional level figure (4.5%) and the national figure (3.9%). Youth unemployment (16-25) as a percentage of total unemployment stood at 30% in April 2012, which was slightly lower than the region (31%) but slightly higher than the UK (29%). The job density figures (a figure of 1 would mean there is 1 job per person of working age) in 2010 stood at 0.78, higher than the region or nationally. In terms of income, in 2011 the average gross weekly pay for all workers living in Calderdale was £462, which was almost equivalent to the region level (£463) but significantly below the national level (£499).
- 8.16** Calderdale's 2011 Local Economic Assessment (LEA) reports that the local economy remains stronger in manufacturing than either the region or the national levels, but has a lower level of service and construction sector jobs. In terms of employment, the local economy is focused

on four sectors, Finance, Public Services, Service Sectors and Manufacturing. Finance accounts for a quarter of all employment in the borough, and the local economy is closely linked with the Lloyds banking group, which provides over 6,000 jobs. The heavy reliance on the financial sector and also the manufacturing sector reflects a lack of diversity in Calderdale's economy, and raises issues over the shape of the local economy in the future. However tourism plays a key role in the local economy, the LEA states that the area receives over 3 million visitors a year and the sector is worth approximately £250 million and supports in the region of 4,200 full time equivalent jobs.

- 8.17** The business registration rate according to was slightly less than both the region and the national figure, but the GVA per employee (£41,699) was higher than the region (£36,617), but slightly lower than the national figure (£41,941). The district has also seen the highest increase in productivity between 2007 and 2010 with a 1.6% increase, and 9.4% of the population are self employed, higher than people than 8.3% of the regions population. Other issues highlighted by the scoping review include the need for the district to attract blue chip and smaller start up businesses to boost the economy.
- 8.18** In terms of retail, Halifax is the biggest town centre in Calderdale, and therefore has the highest proportion of comparison retail floorspace, although this is still below the national average, there is a lack of medium sized premises, and less than half of the top twenty national retailers operate in Halifax. Vacant floorspace levels increased from 7.1% to 10.4% during the period 2000 to 2009, higher than the national average of 8.9%. The town centre qualitative assessment indicates that a vacant town centre unit in itself is not an issue due to the ongoing natural replacement of businesses; instead, of more concern are the areas where there are long term vacancies which may indicate a certain part of the centre or edge of centre is in decline. Brighouse town centre's floorspace vacancy rate increased from 5.9% to 13%, and although there are no concentrations of vacant units, a number have remained vacant in between surveys. The qualitative assessment established there was a vacant floorspace rate of 11% in Elland town centre, with particular concentrations of vacant properties around the Town Hall between Southgate and Huddersfield Road, and also at the northern end of Southgate into Northgate. In Sowerby Bridge, the rate of town centre vacant floorspace was 7.1%, lower than the national average (8.9%).
- 8.19** Hebden Bridge has performed consistently well in retail assessments, and the latest vacancy rates showed that only 4.5% of floorspace was considered vacant, around half of the national average figure (8.9%). A handful of units have remained vacant on Market Street, although this is not an area considered to be experiencing declining business rates. Todmorden in contrast has the highest levels of vacant floorspace in Calderdale; the latest figures show that nearly 29% of floorspace was vacant, more than three times higher than the national average. Particular areas of concern include the northernmost row of shops on Burnley Road, which suggests a potential decline in the retail potential for this part of the town.

9 Stage A4: Developing the Sustainability Appraisal Framework

Sustainability Objectives

9

Developing the Sustainability Appraisal Framework - Task A4

- 9.1** The purpose of the SA framework is to analyse the sustainability effects of the Core Strategy and Land Allocations plans, thereby assisting in determining the most sustainable options. The SA objectives provide a yardstick against which the social, environmental and economic effects of the plan can be tested.

Sustainability Objectives

- 9.2** The sustainability objectives proposed are high level and focus on outcomes rather than the means of achieving the desired state, which is the purpose of policies and objectives in Core Strategy and Land Allocations plans. Government guidance⁽⁷⁾ recommends that in order to keep the SA process manageable, the number of objectives should be between 12 and 25. Through the review of plans, programmes, strategies and initiatives, internal discussion within Planning Services, baseline information, the Community Strategy and with reference to the Yorkshire and Humber Integrated Regional Framework, and Regional Spatial Strategy, 19 initial sustainability objectives were selected and consulted on in a 'Generic Scoping Report' in 2007. The initial list of Sustainability Objectives is presented below:

Table 9.1 Initial List of Sustainability Objectives 2007

	Initial List of Sustainability Objectives
1	Meeting housing need for all
2	Protect and enhance human health
3	Safety and security for people and property
4	Vibrant communities
5	Culture, leisure and recreation activities available to all
6	Improving accessibility to essential services, facilities and employment
7	Improving educational attainment and promoting lifelong learning
8	A quality built environment
9	Reducing the effect of traffic on the environment
10	Cultural heritage conserved
11	Protect and enhance biodiversity
12	Reducing pollution levels
13	Protect and enhance the natural landscape
14	Prudent and efficient use of natural resources and energy
15	Efficient land use patterns

	Initial List of Sustainability Objectives
16	Reducing waste
17	Good quality employment opportunities for all
18	Achieving business success, economic growth and continued investment
19	A highly skilled and knowledgeable workforce

- 9.3** Having arrived at an initial list of sustainability objectives, it was considered that some objectives were unclear as to their exact meaning. The result of both the internal and external consultation with various stakeholders resulted in revisions to a number of the initial objectives. Objectives 1, 7, 13 and 17 were re-worded and initial objectives 2, 10 and 19 deleted, and a specific objective concerning flooding was included. This exercise resulted in a list of 18 more precise and clearer objectives as listed in below. These objectives were then consulted on again in the 2008/9 Sustainability Appraisal Scoping Report that accompanied the Core Strategy Issues and Options consultation.

Table 9.2 List of Proposed Sustainability Objectives - Scoping Report 2008

	Proposed Sustainability Objectives
1	To ensure quality housing is available to everyone
2	To improve safety and security for people and property
3	To create and retain vibrant communities that promote good health and social inclusion
4	To ensure that cultural, leisure, and recreation activities are available to all.
5	To improve accessibility to essential services, facilities and employment.
6	To provide the education and training opportunities to build skills and capacities.
7	To retain, protect and create a quality, locally distinctive built environment
8	To reduce the risk of flooding and resulting detrimental effects on people and property
9	To reduce the effect of traffic on the environment
10	To protect and enhance biodiversity
11	To reduce pollution levels including the carbon footprint of the District
12	To protect and enhance the natural, semi natural and manmade landscape
13	To ensure prudent and efficient use of natural resources and energy.
14	To ensure efficient use of land
15	To reduce the amount of waste produced
16	To provide good employment opportunities for all
17	To achieve business success, economic growth, and continued investment

	Proposed Sustainability Objectives
18	Enhance the Viability and Vitality of the Town Centres

9.4 The consultation on the 2008/9 Scoping Report produced comments that further refined the Sustainability Objectives, and saw further revisions to Objectives 11 and 17. This provided a set of Sustainability Objectives set out below, which are the basis for the assessment of the Core Strategy Refined Issues and Options and subsequently the Preferred Options.

9.5 This further refined set of Sustainability Objectives have been linked to Decision Making Criteria, indicators and targets to form the SA Framework which forms the basis for assessing the plans potential impacts. The Sustainability Objectives that form part of the SA Framework are as follows:

Table 9.3 List of Sustainability Objectives 2011

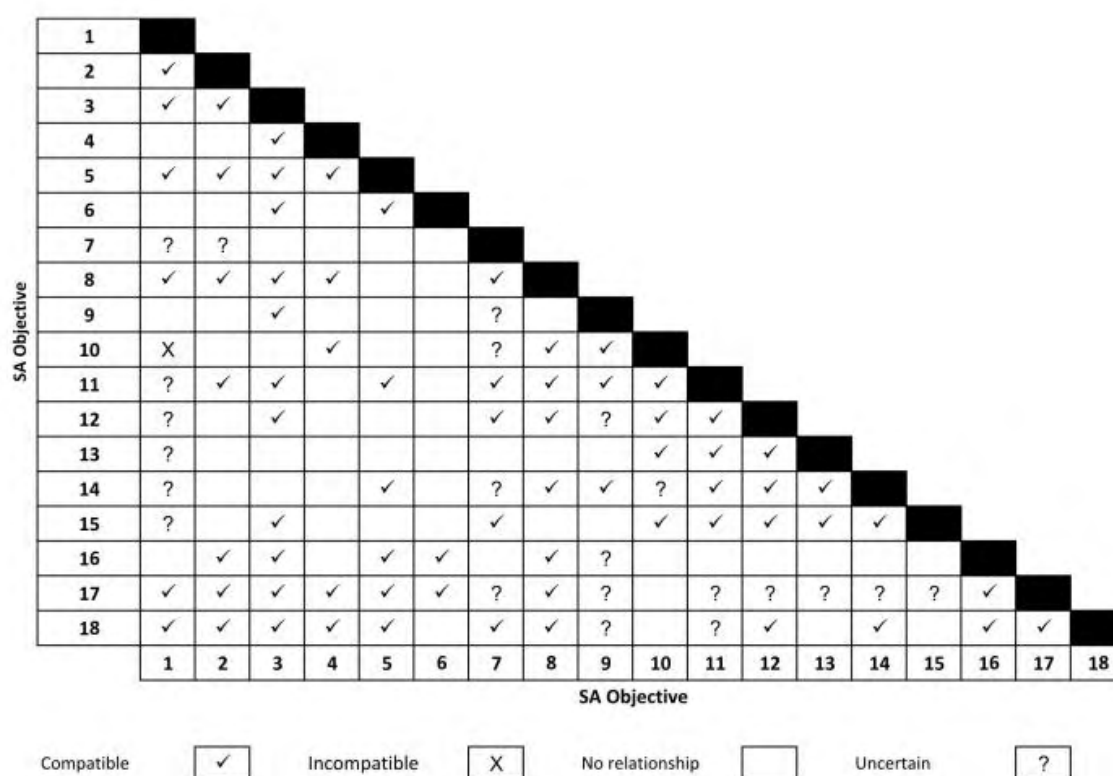
	List of Sustainability Objectives
1	To ensure quality housing is available to everyone
2	To improve safety and security for people and property
3	To create and retain vibrant communities that promote good health and social inclusion
4	To ensure that cultural, leisure, and recreation activities are available to all.
5	To improve accessibility to essential services, facilities and employment
6	To provide the education and training opportunities to build skills and capacities
7	To retain, protect and create a quality, locally distinctive built environment.
8	To reduce the risk of flooding and resulting detrimental effects on people and property.
9	To reduce the effect of traffic on the environment
10	To protect and enhance biodiversity
11	To reduce pollution levels and CO2 emissions to target levels.
12	To protect and enhance the natural, semi natural and manmade landscape.
13	To ensure prudent and efficient use of natural resources and energy.
14	To ensure efficient use of land.
15	To reduce the amount of waste produced
16	To provide good employment opportunities for all
17	To achieve business success, sustainable economic growth, and continued investment
18	Enhance the Viability and Vitality of the Town Centres.

Compatibility of Sustainability Objectives

9.6 Government guidance⁽⁸⁾ recommended that testing the internal compatibility of the SA objectives may be useful as there may be tensions between objectives that cannot be resolved. Examining the compatibility of objectives through a matrix approach showed the degree of compatibility or incompatibility between objectives as well as highlighting those where there was no relationship at all. The following diagram illustrates the outcomes of this exercise.

9.7 The majority of the objectives are either compatible or have no strong relationship. The basis for the assessment results was the 2008/9 Scoping Report set of Sustainability Objectives, but as only two slight amendments were made to the wording of SA Objective's 11 and 17 this did not alter the principle results. There are some instances where an uncertain relationship exists, although this will become easier to determine once specific Local Plan Policies and Spatial Options are appraised. The one area where tension exists at present is between SA objective 1, 'To ensure quality housing is available to everyone' and SA objective 10, 'To protect and enhance biodiversity'. The tension between these objectives will be considered when appraising the emerging options of the Core Strategy, and, perhaps more specifically, the Land Allocations document.

Figure 9.1 Internal Compatibility of Sustainability Appraisal Objectives



10 Sustainability Appraisal Framework

10

Calderdale MBC Sustainability Appraisal 2012

- 10.1** The current SA Framework template, incorporating SA Objectives, Decision Making Criteria, Indicators and Targets (where available) is set out in the next section. Each of the SA objectives has a group of 'Decision Making Criteria', which attempt to establish the potential impacts of the proposed Core Strategy Objective, Policy or Spatial Option. Alongside the Decision Making Criteria, each SA Objective has a number of relevant indicators, which will be used as the plan progresses to monitor the plan's impact(s) across the district. The indicators have been identified during the gathering of local baseline information and regional and national guidance. Alongside the indicators, each of the objectives has a series of targets (where available). The SA Framework is not set in stone, and indicators and targets will require updating on a regular basis; some targets are yet to be developed, where this is the case these will be set out in the final SA report.

Health Impact Assessment

- 10.2** As the Marmot Review (2010)⁽⁹⁾ states, planning has a huge potential to positively affect health through the design of neighbourhoods. The SA Framework therefore includes relevant elements of the Council's Health Impact Assessment (HIA). Incorporating a HIA within the SA framework ensures that a plans' potential impacts on human health are assessed, on one hand identifying potential health gains and benefits, whilst on the other ensuring that any potential risks to health are noted, and considering how best to avoid any such negative impacts.

Table 10.1 Sustainability Appraisal Framework

SA Objective	
1. TO ENSURE QUALITY HOUSING IS AVAILABLE TO EVERYONE	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it reduce homelessness?</p> <p>Will it increase the range and affordability of housing for all social groups?</p> <p>Will proposal affect opportunities to live in good quality and affordable housing?</p> <p>Will it reduce the number of unfit homes?</p>
	Indicators <p>Number of households on Housing Register</p> <p>Number of households designated homeless (per 1000 households)</p> <p>% of households' owner occupied. (Owned outright, with mortgage/loan, shared ownership)</p> <p>% of private rented</p> <p>% of social housing</p> <p>Mean average house price</p> <p>Gross Affordable Housing Completions per annum</p>

SA Objective	
	<p>House price to income ratio (Based on Householders Aged 20-39 & 2-3 Bedroom House).</p> <p>Number of housing completions per annum</p> <p>Number of net additional Gypsy and traveller pitches</p> <p>% of households with no central heating</p> <p>% of households experiencing fuel poverty (i.e. spend more than 10% of income to heat their homes adequately and affordably)</p> <p>Number of unfit homes per 1000 dwellings</p> <p>Housing Quality – Number and proportion of new build completions reaching Very Good, Good, Average or Poor ratings against the building for life (CABE) indicator.</p> <p>Targets</p> <ul style="list-style-type: none"> • As per Strategic Housing Market Assessment = first 5 years 641 per annum, 338 per annum thereafter.
<p>2. TO IMPROVE SAFETY AND SECURITY FOR PEOPLE AND PROPERTY</p>	<p>Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD</p> <p>Will it reduce levels of crime?</p> <p>Will proposal affect personal / community safety (including protection from antisocial behaviour), fear of crime, or crime rates?</p> <p>Will it reduce the fear of crime?</p> <p>Indicators</p> <p>Offences per 1000 population – against British Crime Survey seven key offences comparator</p> <p>Violence against the person per 1000 population</p> <p>Burglary offences per 1000 population</p> <p>Theft of a vehicle per 1000 population</p> <p>Theft from a vehicle per 1000 population</p> <p>Levels of perceived anti social behaviour</p> <p>Number of cyclist road accident casualties</p> <p>Number of pedestrian road accident casualties</p> <p>Number of people killed or seriously injured in road traffic accidents</p> <p>Targets</p> <p>To be established</p>

28 Sustainability Appraisal Framework

10

Calderdale MBC Sustainability Appraisal 2012

SA Objective	
3. TO CREATE AND RETAIN VIBRANT COMMUNITIES THAT PROMOTE GOOD HEALTH AND SOCIAL INCLUSION	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it foster inclusive communities?</p> <p>Will proposal have an impact on the inclusion of people from under represented groups in community life?</p> <p>Will it lead to a more inclusive cohesive community?</p> <p>Will proposal affect people's sense of belonging, social support, and social interaction?</p> <p>Will proposal affect people's self esteem, confidence, hopefulness, optimism, life satisfaction?</p> <p>Will proposal affect people's motivation (e.g. to adopt healthy lifestyles, seek employment, be involved with community life)?</p> <p>Will it reduce death rates?</p> <p>Will it encourage healthier lifestyles?</p> <p>Will proposal increase access to unhealthy food (e.g. take-aways)</p> <p>Will proposal affect physical activity levels (e.g. activity levels of least active people)</p> <p>Will it reduce health inequalities?</p> <p>Will proposal ensure a sustainable impact on wellbeing and health, and on tackling inequalities?</p>
	Indicators <p>Population Growth / Change</p> <p>% of people who feel they can influence decisions in their locality</p> <p>% of people who believe people from different backgrounds get on well together in their local area</p> <p>% of people satisfied with the area as a place to live</p> <p>Infant mortality rate: deaths up to 1 year per 1,000 live births.</p> <p>All age all cause mortality rate (per 100,000 population)</p> <p>% of incapacity benefit claimants</p> <p>% of population with limiting long term illness</p> <p>Life expectancy at birth</p> <p>% of population in general good health</p> <p>Indices of deprivation indicator</p>

SA Objective	
	Targets
	To be established
4. TO ENSURE THAT CULTURAL, LEISURE, AND RECREATION ACTIVITIES ARE AVAILABLE TO ALL.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it improve the accessibility and affordability of cultural, leisure and recreation facilities?</p> <p>Will proposal increase access to leisure / recreation facilities for those with the greatest needs?</p> <p>Will it provide access to the countryside or green space for recreation and enjoyment?</p> <p>Will proposal affect open / green space, places for play and social interaction, access to local countryside?</p>
	Indicators
	<p>Conditions of Rights Of Way</p> <p>Local supply and demand of swimming pools (% of demand met)</p> <p>Local supply and demand of sports halls (% demand met)</p> <p>Personal share of swimming pool facilities (m2)</p> <p>Total number of synthetic pitches (Per 1000 population)</p> <p>Health & Fitness Facilities (Number of Stations per 10000 population)</p> <p>Sports Hall Area (m2 per 1000 population)</p> <p>% of households within 400m of open space</p> <p>% of adults doing 3 x 30 mins of sport per week</p> <p>% of adults doing 1 x 30 mins of moderate intensity physical activity per week from Mixenden, Ovenden and Park Wards</p> <p>Children & Young people's satisfaction with parks and play areas</p> <p>Achievement of the Council's Open Space, Sport and Recreation Standards</p>
	Targets
	<p>Increase provision to at least 1m2 per person of personal share of swimming pool facilities.</p> <p>To meet 100% of demand of local sports halls</p>

30 Sustainability Appraisal Framework

10

SA Objective	
	<p>Increase by 1% per year the % of adults doing 3 x 30 mins of sport per week</p> <p>Increase of 4% over 3 years the % of adults doing 1 x 30 mins of moderate intensity physical activity per week from Mixenden, Ovenden and Park Wards.</p>
5. TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it ensure good quality accessibility to all the facilities and opportunities needed to support life and the quality of life?</p> <p>Will the proposal affect access to services for those with greatest needs?</p> <p>Will it affect demand for existing services?</p> <p>Will proposal affect access to food stores selling healthy and fresh produce?</p>
	Indicators
	<p>% of homes within 400m of a bus stop</p> <p>% of residents within 500m of a Primary School</p> <p>% of residents within 500m of a Secondary School</p> <p>% of the resident population travelling over 20km to work</p> <p>Congestion – average journey time per mile during the morning peak</p> <p>% of the population within 20 minutes (Urban: Walking, Rural: Driving) of a range of 3 different sports facility types</p> <p>% of residents within 500m of a Post Office</p> <p>Total properties per doctors surgery</p>
	Targets
	To be established
6. TO PROVIDE THE EDUCATION AND TRAINING OPPORTUNITIES TO BUILD SKILLS AND CAPACITIES	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it improve qualifications and skills of the workforce?</p> <p>Will proposal impact access to education and training opportunities or basic skills?</p>

SA Objective	
	Indicators
	<p>% of pupils achieving 5+ GCSEs A*-C or equivalent including English & Maths</p> <p>% of students achieving a Level 2 qualification by age 19 (NI79)</p> <p>% of students achieving a Level 3 qualification by age 19</p> <p>% of 17 year olds remaining in further education</p> <p>% of 16-18 year olds who are not in education, training or employment</p> <p>% of population of working age with Level 4 NVQ or higher</p> <p>% of population of working age with Level 2 NVQ or higher qualifications</p> <p>% of population aged 16 -59 (Males) / 64 (Females) with no formal qualifications.</p>
	Targets
	<p>62.3% of pupils achieving 5 + GCSEs A*-C or equivalent including English & Maths by 2011/12</p> <p>78% of students achieving a Level 2 qualification by age 19 (NI79)by 2011/12</p> <p>51% % of students achieving a Level 3 qualification by age 19 by 2011/12</p>
7. TO RETAIN, PROTECT AND CREATE A QUALITY, LOCALLY DISTINCTIVE BUILT ENVIRONMENT.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it lead to a high quality built environment and public realm?</p> <p>Will it protect and enhance sites, features and areas of historical, architectural, archaeological and cultural value?</p> <p>Will it lead to improved levels of green space?</p>
	Indicators
	<p>Improved street and environmental cleanliness (levels of litter and detritus)</p> <p>Number of historic parks and gardens</p> <p>Number of Scheduled Ancient Monuments</p> <p>Number of Conservation Areas</p> <p>Number of Conservation Areas at Risk</p> <p>Number of listed buildings</p> <p>Number of Grade I and Grade II* listed buildings at risk</p> <p>Number of listed buildings demolished</p>

32 Sustainability Appraisal Framework

10

SA Objective	
	<p>Number of parks awarded the Green Flag Award</p> <p>% of population satisfied with local parks and open spaces</p>
	Targets
	Reduction or no increase in numbers of listed buildings, conservation areas and sites at risk.
8. TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it reduce the risk of flooding?</p> <p>Will it prevent inappropriate development in flood risk areas?</p> <p>Will it contribute to reduction of discharge into the Calder catchment?</p> <p>Will it reduce the potential to create washland in future?</p>
	Indicators
	<p>Properties at risk of flooding</p> <p>New development with Sustainable Urban Drainage Systems</p> <p>Number of planning permissions granted contrary to the advice of the Environment Agency on flood risk grounds</p> <p>Number of brown field developments restricting surface water discharge to green field rates or better</p>
	Targets
	<p>Zero planning permissions granted contrary to the advice of the Environment Agency on flood risk grounds</p> <p>Zero enforcement cases under SUDS regulations</p>
9. TO REDUCE THE EFFECT OF TRAFFIC ON THE ENVIRONMENT	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it reduce traffic volumes?</p> <p>Will it increase the proportion of journeys using modes other than the car?</p> <p>Will proposal affect take up of walking / cycling?</p>

SA Objective	
	<p>Will proposal affect how easy it is to access services by public transport, walking and cycling?</p> <p>Will it lead to attractive public transport?</p> <p>Will it affect public transport use?</p> <p>Will it result in greater provision of safe cycle ways and footpaths?</p> <p>Will it lead to an increase of sustainable freight transport?</p>
	Indicators
	<p>Estimated increase in traffic flows for cars (Million Vehicle KM)</p> <p>Distances (miles) travelled per person per year by mode of transport: Car or other private road vehicle (C) Walk (W), Public transport (PT)</p> <p>Travel to work mode Car/Motorbike (C/M), Train (T), Bus (B), Walk (W), Cycle (Cy).</p> <p>Bus passenger journeys (Millions)</p> <p>Rail passenger journeys (Millions)</p> <p>Number of cyclists and pedestrians involved in road accidents (Linked to SA Objective 2)</p> <p>Levels of Rail Freight in the District</p>
	Targets
	<p>West Yorkshire Bus Patronage = WY LTP 2011 Targets are: 175.3m (2014); 183.2m (2017); 191.2m (2020); 192.3m (2023); 193.3m (2026)</p> <p>West Yorkshire Rail Patronage = WY LTP 2011 Targets are: 29.3m (2014); 31.5m (2017); 33.8m (2020); 36m (2023); 38.5m (2026)</p>
10. TO PROTECT AND ENHANCE BIODIVERSITY.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it protect, enhance and create diverse habitats for plants and animals to thrive in, including International, national and locally protected sites?</p>
	Indicators
	<p>Number and area of designated SSSI</p> <p>Condition of SSSI</p> <p>Number and area of designated Sites of Ecological or Geological Importance (SEGI)</p>

34 Sustainability Appraisal Framework

10

SA Objective	
	<p>Number and area of Local Nature Reserves (LNR)</p> <p>Change in areas of biodiversity importance</p> <p>Condition of SEGI</p>
	Targets
	<p>95% of SSSI's to be in a favourable or recovering condition.</p> <p>10 designated LNR / 1ha of LNR per 1000 population.</p> <p>Meeting the targets for habitats and species established in the Local Biodiversity Action Plan.</p> <p>Consider target for Preserving and Developing Wildlife Corridors.</p>
11. TO REDUCE POLLUTION LEVELS AND CO2 EMISSIONS TO TARGET LEVELS.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it reduce greenhouse gas emissions?</p> <p>Will the built environment's effect on the planet be reduced through sustainable construction?</p> <p>Will proposal make use of locally sourced and renewable materials?</p> <p>Will it improve air quality?</p> <p>Will it improve water quality?</p> <p>Will proposal affect drinking water quality?</p>
	<p>Indicators</p> <p>Total CO2 emissions per capita (2003)</p> <p>Monitored NOx levels (urban areas)</p> <p>PM10 levels thousand tonnes</p> <p>% of new development meeting Level 3 of the Code for Sustainable Homes</p> <p>% of new development meeting the BREEAM 'Very Good' rating</p> <p>Number of Air Quality Management Areas designated</p> <p>Average number of days air pollution is moderate or high Urban (U) and Rural (R) sites</p> <p>% of river / canal length that is of good quality (Chemical)</p> <p>% of river / canal length that is of good quality (Biological)</p>

SA Objective	
	<p>Targets</p> <p>Achieving a 40% reduction in CO2 emissions from a 2005 baseline; The Climate Change Act (2008) contains a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, through actions both in the UK and overseas. The Act also requires a reduction in emissions of at least 34% by 2020. Achieving reductions in emissions ahead of the national standards and targets. Air Quality Action Plan Targets to be met. Maintain the classification of the River Calder and its tributaries as 'Good'.</p>
<p>12. TO PROTECT AND ENHANCE THE NATURAL, SEMI NATURAL AND MANMADE LANDSCAPE.</p>	<p>Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD</p> <p>Will it protect and enhance the Green Belt? Will it protect hedgerows? Will it protect woodlands? Will it protect upland heathland? Will it protect blanket bog? Will it protect agricultural land? Will proposal affect the local production and availability of healthy and affordable food? Will it protect unimproved grassland? Will it protect rivers and streams?</p> <p>Indicators</p> <p>Green Belt Land Cover Amount of Green Belt Land developed Area of species rich hedgerows Ancient Woodland Cover Area of Woodland Cover Upland Heathland Blanket Bog Amount of agricultural Land (Grade 3) developed. Area of unimproved grassland Quality of rivers and streams</p> <p>Targets</p> <p>Biodiversity Action Plan (BAP) target is to Plant 10km of species rich hedgerows BAP target is to ensure all native woodland wildlife sites are maintained in an ecologically favourable condition.</p>

36 Sustainability Appraisal Framework

10

SA Objective	
	<p>BAP target to restore 5ha of upland oakwood, 150ha of lowland mixed deciduous woodland, and 5ha of wet woodland.</p> <p>BAP target to create 20ha of upland oakwood, 40ha of lowland mixed deciduous woodland and 5ha of wet woodland.</p> <p>BAP target to create or restore 200ha of Upland Heathland by 2011</p> <p>BAP target to create or restore 100ha of blanket bog.</p> <p>BAP target to restore 20ha and create 100ha of unimproved grassland.</p> <p>Ensure all rivers, streams and wildlife sites e.g. SSSI, SEGIs or equivalent are maintained in an ecologically favourable condition.</p> <p>BAP target to restore 5km of degraded habitat.</p>
13.TO ENSURE PRUDENT AND EFFICIENT USE OF NATURAL RESOURCES AND ENERGY.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it ensure increased use of renewable energy?</p> <p>Will proposal utilise efficient / renewable sources of energy?</p> <p>Will it reduce energy consumption and lead to energy efficient developments?</p> <p>Will it reduce water consumption?</p> <p>Will it ensure a reduction in water leakage?</p> <p>Will it lead to a reduced use of primary aggregates and lead to recycling of materials?</p>
	Indicators <p>Generation of electricity from renewable sources</p> <p>Levels of renewable energy generated by type</p> <p>Average annual domestic consumption of electricity per household</p> <p>Average annual domestic consumption of gas</p> <p>Average energy efficiency (SAP# rating) of housing stock</p> <p>Total CHP Generation Heat (H) & Electricity (E)</p> <p>Daily domestic water consumption per head per day in litres</p> <p>Water Leakage - Household supply (Million litres per day M/ld))</p> <p>Number of mineral extraction sites</p>

SA Objective	
	<p>Production of primary land won aggregates (tonnes)</p> <p>Production of secondary and recycled aggregates by mineral planning authority</p>
	Targets
	<p>UK committed to generate at least 15% of energy demand from renewable sources by 2020. The RSS target for Renewable Energy generation Calderdale is for 19MW by 2010, and 53MW by 2021.</p> <p>In terms of an indicative local target, the Maslen report suggested an additional 28.34MW is required to meet the notional 2020 target. The same report also suggested a number of Local indicative 'Uptake' scenarios for 2020 as follows:</p> <p style="padding-left: 40px;">High Uptake = 47MW, Medium Uptake = 29MW, and Low Uptake = 21.4MW.</p> <p>Final targets to be agreed through the Local Plan consultation process.</p>
14. TO ENSURE EFFICIENT USE OF LAND.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it lead to the re-use of previously developed sites?</p> <p>Will the proposal result in buildings and spaces that allow for adaptation, conversion, or extension?</p> <p>Will it lead to higher density and/or mixed-use developments?</p> <p>Will it reduce the amount of derelict and degraded land?</p> <p>Will proposal bring disused buildings / spaces into productive use for benefit of local community?</p>
	<p>Indicators</p> <p>% of new housing completions built on brownfield land</p> <p>Amount of employment floor space developed on brownfield land</p> <p>% of new dwellings completed at less than 30 dwellings per hectare</p> <p>% of new dwellings completed at between 30 and 50 dwellings per hectare</p>

38 Sustainability Appraisal Framework

10

SA Objective	
	% of new dwellings completed at above 50 dwellings per hectare % of dwellings vacant
	Targets
	RSS calls for at least 65% of new housing completions to be on brownfield land.
15. TO REDUCE THE AMOUNT OF WASTE PRODUCED.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	Will it lead to reduced consumption of materials and resources? Will it reduce waste through recovery and recycling? Will proposal affect waste disposal and recycling?
	Indicators
	Kg of Household waste collected per head % of household waste recycled % household waste composted % of municipal waste landfilled
	Targets
	Match the National Waste Strategy Recycling and composting targets of 45% by 2015 and 50% by 2020; and Recovering Value from Municipal Waste – 67% by 2015 and 75% by 2020. Reducing Biodegradable Municipal Waste landfilled to 50% of that in 1995 by 2013; and Reducing Biodegradable Municipal Waste landfilled to 35% of that in 1995 by 2020.
16. TO PROVIDE GOOD EMPLOYMENT OPPORTUNITIES FOR ALL.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	Will it help to provide good employment opportunities? Will proposal affect employment or volunteering opportunities? Will it offer employment opportunities to disadvantaged groups? Will it help to reduce commuting out of the district? Will it help to improve earnings?

SA Objective	
	<p>Will the proposal have an impact on income? Will it reduce gap between high and low earners?</p>
	Indicators
	<p>Claimant count based rate of unemployment % of working age population who are economically active Unemployment levels as % of people of working age % of jobs by type (M = manufacturing, S = service, C = construction) % of working age people claiming out of work benefits in the worst performing neighbourhoods Job density (Number of jobs per head of working population, e.g. a job density of '1' would mean there is one job per person) Average Gross weekly pay (all workers living in Calderdale)</p>
	Targets
	<p>Awaiting updated targets concerning % of working age people claiming out of work benefits in the worst performing neighbourhoods.</p>
17. TO ACHIEVE BUSINESS SUCCESS, SUSTAINABLE ECONOMIC GROWTH, AND CONTINUED INVESTMENT.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	<p>Will it allow the growth of existing firms? Will it encourage inward investment? Will it improve the resilience of businesses and the economy?</p>
	Indicators
	<p>Proportion of new businesses surviving at least 1 year Employment Land available (Mixed Use and Employment Allocations) Total amount of additional employment floor space – by type New businesses which survive 3 years Business registration rate Business de registration rate</p>
	Targets
	<p>Awaiting updated targets</p>

40 Sustainability Appraisal Framework

10

Calderdale MBC Sustainability Appraisal 2012

SA Objective	
18. ENHANCE THE VIABILITY AND VITALITY OF THE TOWN CENTRES.	Decision Making Criteria For Core Strategy and Land Allocations and Designations DPD
	Will it attract new retailers and other town centre users to the major centres within Calderdale? Will it allow current retailers to remain trading in the major centres within Calderdale?
	Indicators
	Shopping floor space per sector Retail vacancy rates in the Town and District Centres
	Targets
	None as yet

11 Stage B: Sustainability Appraisal of the Refined Issues and Options

- 11.1** The following section of the SA report concentrates on the assessment of the Refined Issues and Options. In order to establish an assessment that incorporated as wider view as possible, officers from a number of different departments were invited to form a SA working group. Officers from social, economic, and environmental departments were all involved; some of whom had already contributed during the work on the SA Scoping Report. These included housing, health, business and economy, biodiversity, neighbourhoods and community engagement, and environmental management.
- 11.2** Those officers forming the SA working group were each allocated a number of SA Objectives most relevant to their area of expertise. The next stage of the task was to assess the potential short, medium, and long term impacts of the Refined Issues and Policy options document on the SA Objectives. This involved appraisal of three elements of the Core Strategy; the Strategic Objectives (**SO**), the Spatial Options, and the Policy Options (**PO**). It must be noted at this stage given the strategic nature of a vast number of the Strategic Objectives, Policy and Spatial Options, not all potential impacts have been recorded; however, where this was not the case, in some instances a suggested alternative has been expressed by the assessment.
- 11.3** The following section reports on the comments of the working group concerning the impacts of the three elements of the Core Strategy against each of the SA Objectives. Some comments were expressed against the overall plan rather than any specific Strategic Objective (SO), Spatial Option, or Policy Option (PO); but where possible, have been placed against the most relevant SA objective. Each section is summarised by a table, summarising the potential positive, uncertain, or negative impacts. Again, where possible these have been split by Core Strategy Strategic Objective (SO), Spatial Option, and Policy Option (PO); where general comments have been submitted these too are summarised in the table.
- 11.4** The assessment of the Refined Issues and Options took place during the early part of 2012, and therefore references are made to other planning policy documents that were in place at the time of the assessment, as opposed to the National Planning Policy Framework that was introduced after the assessment was carried out.

Impact on SA Objectives

Impact on SA 1 "To ensure quality housing is available to everyone"

- 11.5** The impact of the plan on the SA Objective will depend on makeup of housing options, e.g. shared ownership, rent levels, type and cost of properties to encourage a mix of individuals and families. It will also depend on how the Plans Objectives are linked with work around homelessness within the council and other social landlords. It will be necessary to require housing to be closely linked with other improvements/developments, employment etc in areas. Sustainable development incorporates the principle that housing should be of good quality, and therefore **SO1** should make a positive contribution to this SA Objective. **SO2 (Climate Change)** aims to reduce green house gas emissions, which will involve improving the thermal insulation and efficiency of dwellings, thus enhancing the quality of housing. Addressing climate change should also help to tackle fuel poverty.
- 11.6** Economic growth as expressed by **SO3 (Economy and Enterprise)** brings with it a demand for good quality housing in the Borough which is affordable for the workforce, and therefore has the potential to have a positive impact on this SA Objective. Likewise, **SO4 (Housing)** is intrinsic to ensuring that good quality housing is available to everyone, and therefore strongly supports the objective. Another factor related to the quality of housing is its local environment, which is enhanced by retaining green spaces in the immediate and wider neighbourhood,

something which **SO5 (Green Infrastructure and the Natural Environment)** would have a positive effect on.

- 11.7 SO6 (Historic Environment and Design)** should ensure that the design of new developments, including residential developments is high quality and inclusive. This may however increase costs and render some new housing unaffordable, and therefore although considered to have a largely positive impact, the affordability aspect could have uncertain impacts. If housing is well connected to public transport systems **SO7 (Transport)** then it is more sustainable, and in turn would support the SA Objective. Narrowing the gap **SO8 (Communities & Narrowing the Gap)** involves ensuring that poorer communities have the opportunity to access good quality and affordable housing. Comments were expressed that both the **Minerals (SO9)** and **Waste (SO10)** objectives could have an uncertain impact, since locating such sites near to housing developments would adversely impact on the quality of place.
- 11.8** In terms of the Spatial Options, a focus on the eastern side of Calderdale as expressed through **Spatial Option 1 (Focus on Eastern Calderdale)** is likely have a positive impact, as it would result in an increase in the supply of new housing and thus in the supply of new affordable housing in this area. There is an unmet need for affordable housing in the eastern side of the Borough. **Spatial Option 2 (Enhancing the Role of Todmorden)** proposes to enhance the role of Todmorden; in order to fulfil its role as a principal town, there would be significant growth in new housing in Todmorden. Whilst this would improve supply, the overall impact is considered uncertain, since it is not clear as to whether there is the demand for a significantly increased supply of housing in the area. A focus on **Spatial Option 3 (Enhance the Role of Elland)** is likely to result in an increase in the supply of new housing and thus in the supply of new affordable housing in this area, and as there is an unmet need for affordable housing in Elland, this would have a positive impact on the SA objective. Finally, as there is a shortage of good quality affordable housing in most areas of Calderdale spreading new development across the district as proposed by **Spatial Option 4 (Current Role and Function)** would mean that all areas would benefit from new housing and thus new affordable housing obtained as a result of S106 agreements.
- 11.9** Concerning the Policy Options (PO), Sustainable Development principles expressed in **PO1** incorporate the necessity for good quality design and construction in new housing. Sustainability principles also incorporate the necessity of new developments including a proportion of affordable housing. Locating the development of new homes in areas that are accessible by public transport provides opportunities for households without cars to access the affordable housing included in those developments, therefore a positive impact through **PO2** is envisaged. Improving the energy efficiency of new dwellings (**PO3**) will help to reduce fuel poverty and reduce the emission of greenhouse gases; similarly the requirement for new housing developments above a certain size to generate a proportion of their fuel on site (**PO4**) mean that fuel costs in those dwellings will be lower and thus the quality of the housing enhanced. **PO5** should reduce the risk of properties being flooded and thus reduce insurance premiums, and the good design that is the aim of **PO6** will improve the quality of new housing.
- 11.10** Increasing employment opportunities in Calderdale (**PO8**) means that more people are able to obtain work in the borough and this improves their ability to pay for their housing costs and widens the range of housing available for them. Promoting opportunities for home working in new developments (**PO9**) will improve the quality of housing and render it affordable to more people by reducing transport to work costs. Both **PO12** and **PO13** should reduce the number of empty homes in the town centre through their aims of increasing the vibrancy and quality of the town centres, whilst the aim of **PO14** to provide more employment opportunities, particularly in the areas where deprivation is highest, will increase household incomes and enable more people to invest in their homes and undertake repairs etc. It would also enable more people to have a wider choice of housing. Planning for more housing than RSS/New Growth Point requirements as suggested in **PO16** would help to ensure that there is a sufficient

supply of new housing to meet future housing needs and incorporate any increases in inward migration. **PO17** will help ensure that sufficient affordable housing is available to meet differing housing needs across Calderdale. A rural exceptions policy would help deliver affordable housing in the rural villages and prevent young people who have grown up in those areas having to move to other areas when they are ready to live independently.

11

Sustainability Appraisal 2012 Calderdale MBC

- 11.11 PO18** aims to incorporate high standards and sustainability in residential developments, improve the existing dwelling stock, reduce the number of empty homes, and will result in more people living in good quality housing. It is considered that **PO19** would result in there being more suitable accommodation available for the very small gypsy and traveller community in Calderdale, which supports the SA objective. Green Infrastructure and the Natural Environment policy options (**PO22,23,24&25**) were all considered to have a positive impact through their aim to improve the quality of place in residential developments and thus improve the quality of the life for residents. Good design is intrinsic to good quality housing, therefore positive impacts are expected from **PO27&PO28**, and in requiring Lifetime Homes Standards and improving accessibility, **PO29** is also supportive of the SA objective.
- 11.12** Good infrastructure and good connectivity (**PO30**) help make new housing developments more sustainable and thus impact positively on the quality of the housing. Additionally, good walking and cycling routes (**PO31**) help reduce expenditure on vehicle travel and thus result in more money available for households to pay for and invest in housing. Promoting opportunities for home working in new developments (**PO32**) will improve the quality of housing and render it affordable to more people by reducing transport to work costs. Reducing the need to travel results in more money available for households to pay for and invest in housing, therefore it supports this SA objective. Work to address differences in health etc between different communities (**PO33**) requires addressing the poor housing conditions that exist in our most deprived communities. In practise this means providing better quality housing for more people and therefore having a positive impact on the SA objective.
- 11.13** In terms of the **Minerals and Waste Policy Options (MW)** the only comments against this SA objective concerned **MW18 & MW19**, and it was felt these had the potential to have a positive impact on the SA objective, since effective separation, segregation and storage of waste, means waste storage facilities will be less visually obvious and will improve the external appearance and thus the quality of new housing developments.

Table 11.1 - Summary of Impacts on SA 1: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options.

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Sustainable Development (SO1); Reducing green house gas emissions (SO2); Improving energy efficiency (SO2); Economic Growth (SO3); Meeting the Housing Needs (SO4); Green Spaces (SO5); High quality and Inclusive Design (SO6); Well connected to public transport (SO7); Access to good quality and affordable housing (SO8)	Depends on Housing Mix; Depends on links to Homelessness work within the Council and other Social Landlords; Affordability of high quality design (SO6); Impacts of Minerals and Waste	

	Development (SO9,10)	
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
Focus on East Calderdale (Option 1); Enhance the role of Elland (Option 3); Current role and Function (Option 4)	Enhance the role of Todmorden (Option 2)	
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
<p>Good quality design and construction (PO1);</p> <p>Requirement to develop certain % of affordable housing (PO1);</p> <p>Develop in areas well connected (PO2);</p> <p>Reducing emissions and fuel poverty (PO3);</p> <p>Generation of renewable energy (PO4);</p> <p>Reducing flood risk and insurance premiums (PO5);</p> <p>Good design (PO6,27,28);</p> <p>Increasing employment improves ability to pay for housing costs (PO8);</p> <p>Promotion of home working (PO9);</p> <p>Improving town centres (PO12,13);</p> <p>Increasing jobs and therefore household incomes especially in deprived areas (PO14);</p> <p>Planning for more than Regional housing figures will ensure sufficient supply (PO16);</p> <p>Deliver sufficient housing to meet differing needs across the Borough (PO17);</p> <p>Rural Exception Policy (PO17);</p> <p>Develop housing to high standards and improve existing housing (PO18);</p> <p>Provision of suitable accommodation for small gypsy and traveller community (PO19);</p> <p>Aims to improve the quality of place (PO22,23,24,25);</p> <p>Requiring lifetime homes (PO29)</p> <p>Good infrastructure and connectivity (PO30);</p> <p>Good walking and cycling routes (PO31);</p> <p>Promoting home working and reducing the need to travel (PO32);</p> <p>Working to address health inequalities (PO33)</p> <p>Effective waste separation, segregation and storage (MW18,19)</p>		

Impact on SA 2 "To improve safety and security for people and property"

11.14 Designing out crime as part of the development of housing, infrastructure etc. will impact

positively on potential crime levels; for instance removal of a derelict building which may be used for drinking and anti social behaviour, could be replaced by creating places for children and young people. Any new developments or improvements can have either positive or negative impacts on an individual's or communities safety, for example improvements to an area may at the same time take away a well loved green space. Fear of crime is a very subjective feeling and it can be difficult to identify what may or may not reduce someone's feelings around this subject, although positive images in the overall environment can assist. Overall the plan was considered at present to pose an uncertain impact on the SA objective as the variables on items which could be either positive or negative are many. Any developments in areas should be linked with the community safety partnership group in the relevant area, and it was also commented that community safety group should be involved in consultation processes.

Table 11.2 - Summary of Impacts on SA 2: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options.

Core Strategy - Overall Document		
Positive +	Uncertain ?	Negative X
Designing out crime as part of development	New developments have the potential to have both positive and negative impacts; Impact on fear of crime uncertain; Overall impact uncertain	Potential loss of Green Space

Impact on SA 3 "To create and retain vibrant communities that promote good health and social inclusion"

- 11.15** Whether or not the plan will foster inclusive communities, impact on the inclusion of people from under represented groups in community life, lead to a more cohesive community, affect people's sense of belonging, optimism, motivation etc will depend on how the plan and related consultations are presented to people, and the level of involvement with /by communities in the proposals and delivery of the objectives. There is also the issue of linking the plan to existing and planned developments by partner organisations.
- 11.16** Specific comments included the fact that effective implementation of **SO8 (Communities and Narrowing the Gap)** is central to promoting social inclusion. Comments from the SA working group around increasing social inclusion included improving educational achievement, skills, employment opportunities, and the accessibility of local opportunities, facilities and services in the most deprived areas. Additionally, explicitly connecting people, especially local people in deprived areas, with these opportunities was key to supporting the SA objective.
- 11.17** There was also comment on specific Spatial Options. **Spatial Option 4 (Current Role & Function)** was considered likely to have the most mileage in meeting the objectives of **SO8 (Communities and Narrowing the Gap)** and therefore SA3 in these respects, in that all of Calderdale's larger towns, where the vast bulk of deprivation is located, would receive their share of development. **Spatial Option 1 (Focus on Eastern Calderdale)** would also be strong in these respects – but would be to the detriment of Todmorden (where there is significant deprivation), which could miss out on some much-needed development. With this in mind it was suggested that mixed use developments located in the most deprived areas offer the greatest scope to promote social inclusion, and the option to locate specific development in North Halifax, on an 'urban village' basis, should be explored.
- 11.18** It was considered impossible to predict impacts on healthier lifestyles or access to unhealthy food at this point in the plan preparation process. There is considerable potential to increase

physical activity levels encouraged by this SA objective and **SO8 (Communities and Narrowing the Gap)** by promoting everyday physical activity in the form of walking and cycling – especially if this is geared towards enabling as many people as possible being able to access local opportunities, facilities and services by these means. In order to support such an approach, all developments should be required to minimise the need to travel by private car, whilst maximising access by walking and cycling through high quality routes, facilities and infrastructure, and also public transport.

11.19 Spatial Option 4 (Current Role and Function) was considered likely to offer the most mileage in reducing health inequalities on a Calderdale-wide basis. It was again felt impossible to predict the impact on death rates and health inequalities at this point, however, both greater social inclusion and greater active travel (walking and cycling), especially if targeted in the most deprived towns across Calderdale, will be beneficial.

Table 11.3 - Summary of Impacts on SA 3: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Narrowing the Gap central to promoting social inclusion (SO8); Promote walking, cycling and public transport (SO8); Improve access to services, facilities and jobs (SO8)	Depends on how the plan is consulted and presented to people	
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
Directing development to all of Calderdale's larger towns (Option 4); Focus on Eastern Calderdale would be positive for towns in this area (Option 1); Reducing health inequalities on a Calderdale wide basis (Option 4)	Unable to predict impact of plan on health inequalities and death rates.	Todmorden could miss out on much needed development (Option 1)
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
General comments Policies that promote mixed use developments in the most deprived areas; The urban village in North Halifax; Policies that require developments to minimise the need to travel by private car		

Impact on SA 4 "To ensure that cultural, leisure, and recreation activities are available to all"

11.20 Whether or not the plan would affect open and/ or green spaces, places for play and social interaction, or access to local countryside was considered uncertain. The plan could have a very negative impact by reducing access to 'traditional' areas in or around communities, therefore any loss of this resource needs to be balanced with the provision of new spaces.

Table 11.4 - Summary of Impacts on SA 4: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
	Impact on Green Spaces; Access to Countryside.	

11

Sustainability Appraisal 2012 Calderdale MBC

Impact on SA 5 "To improve accessibility to essential services, facilities and employment"

- 11.21** The principles of sustainable development include improving accessibility to services, facilities and employment, and therefore **SO1 (Sustainable Development)** is considered to have the potential to be a positive impact on this SA objective; similarly, **SO2 (Climate Change)** and the SA objective should be mutually beneficial, particularly in terms of transport issues. Improving accessibility tends to involve enhancement of public transport and active travel options, and thereby contributes to reduced emissions from transportation. Improvements to employment opportunities in Calderdale through **SO3 (Economy & Enterprise)** will not necessarily improve accessibility to those opportunities, unless accessibility is specifically taken into account by new employers.
- 11.22** **SO4 (Housing)** refers to 'sustainable locations' as well as 'making use of previously developed land' for new housing, which suggests that accessibility has been considered when choosing locations. However, this could be made more explicit within the description of the objective. Protection and enhancement of green infrastructure in **SO5 (Green Infrastructure and the Natural Environment)** will help to maintain and improve access to natural facilities which promote health such as parks and open spaces.
- 11.23** There is potential for some positive impacts through **SO6 (Historic Environment and Design)** in terms of access to cultural heritage facilities. The result of developing a truly sustainable transport system as envisaged in **SO7 (Transport)** will be to improve accessibility across the District and therefore contribute positively to this SA objective. Working towards achieving **SO8 (Communities and Narrowing the Gap)** will necessarily involve improvements to accessibility, again making a positive contribution.
- 11.24** Comments on the potential impact of the **Spatial Options** were also submitted against this SA objective. **Spatial Option 1 (Focus on Eastern Calderdale)** would have a positive impact on the SA objective as far as eastern Calderdale is concerned, but a negative impact for other areas such as the Upper Calder and Ryburn Valleys where little development would take place. This could result in reduced accessibility for the people in the latter areas. **Spatial Option 2 (Enhancing the Role of Todmorden)** was considered to spread development more widely across Calderdale, focusing on Halifax, Brighouse and Todmorden. This spread would result in better accessibility for people across the whole district. **Spatial Option 3 (Enhance the Role of Elland)** was suggested to have a positive impact for Halifax, Brighouse and

Elland, but there would be a risk that other parts of the district would then miss out on development that improved local accessibility. Finally, **Spatial Option 4 (Current Role and Function)** focuses on further development of existing urban centres. As such, whilst accessibility might improve on the outskirts of these areas, little improvement is likely in more rural areas where accessibility already tends to be poorest.

- 11.25** Additional comments were forwarded against individual Policy Options. Positive impacts were considered to include the principles of sustainable development including the improvement of accessibility to services, facilities and employment (**PO1**), recognising that new development is desirable near to existing public transport nodes (**PO2**), and reducing the risk of flooding (**PO5**) and design features such as SUDS (**PO6**) will improve access to all services by minimising risk of disruption to the transport networks.
- 11.26** Appropriate responses to the protection and enhancement of biodiversity and the natural environment will help to maintain and improve access to natural facilities which promote health such as parks and open spaces (**PO7**). **PO8** promotes better access to employment through a choice of employment sites and improvements to transport infrastructure. Promotion of home working opportunities in new residential developments in **PO9** will improve employment accessibility.
- 11.27** Managing the retail mix could contribute to improving accessibility to a range of services and facilities (**PO11**). Enhancing the quality of town centres will improve accessibility for all, and particularly for vulnerable groups in terms of safety and physical access. If successful **PO13** could increase demand for existing town centre services by bringing more people into town centres more often. **PO14** will improve access to employment for those in greatest need, whilst prioritising measures to address local deficiencies will increase access to the natural environment in areas with the greatest need (**PO20**). Whichever approach is chosen from **PO21**, enhancement of green infrastructure in Calderdale will improve inhabitants' accessibility to natural environment services and associated health benefits. Encouraging better use of green infrastructure will contribute to improving accessibility to under utilised sites (**PO22**). Joined up green infrastructure can increase the attractiveness of active travel modes such as walking and cycling, thereby improving accessibility along the routes involved (**PO23 & PO25**). Protecting and enhancing access to cultural heritage facilities (**PO26**) supports the SA objective, as does ensuring greater accessibility on new developments (**PO29**). Careful planning and improvements to transport infrastructure in relation to **PO30** will help to improve accessibility across the district, whilst provision of high quality walking and cycling routes will improve accessibility for disadvantaged groups where car ownership tends to be lower. Actively discouraging car use will ease pressure on road networks and improve journey times (**PO31**). Mixed-use developments provide excellent accessibility – services are available locally without the need to travel, and including appropriate retail opportunities in such developments could increase access to healthy fresh food (**PO32**). Finally, enhancing leisure opportunities on restored Mineral sites (**MW7**) will provide new services for local communities, thereby increasing local accessibility.
- 11.28** There were also some comments that suggested certain policy options could have an unforeseen negative impact on the SA objective. For instance, better sharing of road space may increase numbers of people cycling and using public transport, thereby putting pressure on the bus services and on cycle parking facilities (**PO31**).
- 11.29** A number of comments suggested the impact on the SA objective would be uncertain. **PO10** could improve or reduce access to retail facilities (including shops selling healthy, fresh produce) in different local areas. Impacts would depend upon the approach chosen. Again, depending on the approach chosen, **PO12** could improve accessibility to facilities and services across the district, or restrict it to major urban centres thereby reducing accessibility for more rural communities. Depending on the number and location of new houses, **PO16** could affect demand for existing services in certain areas, and **PO17** could enhance or detract from access

to services for vulnerable groups, by locating affordable housing either near to, or far away from, existing infrastructure. In providing good quality residential developments **PO18**, there could be an affect on the demand for existing services. Additionally, improvement and re-use of existing housing stock could contribute to ensuring accessibility, as existing stock tends to be situated near existing services and employment.

11

Sustainability Appraisal 2012 Calderdale MBC

- 11.30** Both Mineral Safeguarding Areas (**MW1 & MW2**) policies and the New Waste Facilities (**MW15**) policy were considered to have the potential to prevent development that would provide improved accessibility for some communities in Calderdale.

Table 11.5 - Summary of Impacts on SA 5: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Improving accessibility (SO1); Sustainable transport system (SO2,7); Sustainable Locations and Previously Developed Land (SO4); Protection and enhancement of Green Infrastructure (SO5); Narrowing the Gap (SO8)	Improvements to employment opportunities; Impacts on access to cultural heritage.	
Core Strategy Spatial Options		
Positive +	Uncertain?	Negative X
Focus on Eastern Calderdale would have a positive impact on this part of the district (Spatial Option 1); Spread development across the district (Spatial Option 2)	Uncertain impacts on areas other than Halifax, Brighouse or Elland (Spatial Option 3)	Reduced accessibility for Upper Calder and Ryburn Valleys (Spatial Option 1); Little improvement in access for rural areas where tends to be poorest (Spatial Option 4)
Core Strategy Policy Options		
Positive +	Uncertain?	Negative X
Principles of Sustainable Development (PO1); New development adjacent transport nodes (PO2); Minimising disruption to transport networks (PO5,6); Protecting and enhancing biodiversity and the natural environment ((PO7);	Impacts on access to retail facilities dependent on approach chosen (PO10); Impacts on access to facilities and services dependent on approach chosen (PO12);	Increased cycling and public transport use could put additional pressure on bus services and cycle parking facilities (PO31)

<p>Better access to employment and improving transport infrastructure (PO8);</p> <p>Promoting home working (PO9);</p> <p>Managing the retail mix (PO11);</p> <p>Improving the equality of the town centres (PO13);</p> <p>Improving access to employment (PO14);</p> <p>Improvement/re-use of existing housing likely to increase accessibility (PO18)</p> <p>Addressing deficiencies in Green Infrastructure (PO20);</p> <p>Enhancing Green Infrastructure (PO21);</p> <p>Encouraging better use of Green Infrastructure (PO22,23,25);</p> <p>Protecting and enhancing access to cultural heritage facilities (PO26);</p> <p>Ensuring greater accessibility on new developments (PO29);</p> <p>Improvements to transport infrastructure (PO30);</p> <p>Promoting non car travel will reduce congestion (PO31);</p> <p>Mixed use developments (PO32);</p> <p>Restoration of mineral sites (MW7)</p>	<p>Demand for existing services affected by number and location of new houses (PO16,18);</p> <p>Impact dependent on location of affordable housing in relation to existing infrastructure (PO17);</p> <p>Mineral Safeguarding and New Waste facilities could prevent improving accessibility (MW1,2,15)</p>	
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Impact on SA 6 "To provide the education and training opportunities to build skills and capacities"

- 11.31** There were no specific comments concerning the impact of the Core Strategy Refined Issues and Options on this SA Objective. A further assessment will be carried out as part of the drafting of the preferred options document in order to ensure the plans policies take into account the aims of the SA objective.

Impact on SA 7 "To retain, protect and create a quality locally distinctive built environment"

- 11.32** A generally positive impact from **SO1 (Sustainable Development)** was predicted as the principle of reusing existing buildings supports the SA Objective. However, the proviso was that it is acknowledged that some sustainable principles may not be achievable if they adversely affect the character of heritage assets. There was a potential negative impact on **SO2 (Climate Change)** in terms of inappropriate development in, on, and around heritage assets. Guidance provided by English Heritage and Planning Policy Statement 5 'Planning for the Historic Environment' needed to be followed. **SO3 (Economy & Enterprise)** was viewed as generally positive, providing that the historic environment is considered as an integral part of any scheme. It was vital that building should not take place at the expense of character. The second part of **SO3** was considered particularly important in relation to the potential impact on this objective. The Core Strategy Housing objective (**SO4**) was considered as having a negative potential impact as the quality of the environment was not considered in the objective as it stands. **SO6 (Historic Environment and Design)** was, as expected, considered to offer positive support for the SA objective. There was a potential impact from **SO7 (Transport)**, but whether it would be positive or negative was dependent on the impact on the character of the built environment from new transport related facilities. **SO9 (Minerals)** could lead to a

potential conflict with conservation areas and sites of historic significance, although at the moment the extent of the impact was uncertain.

- 11.33** As far as this objective and the Spatial Options were concerned, comments suggested that whichever Spatial Option was chosen, there was potential conflict with heritage assets, conservation areas, and sites of historic significance.
- 11.34** The principle of reusing existing buildings is positive, with the proviso that it is acknowledged that some sustainable principles (**PO1**) may not be achievable if they adversely affect the character of heritage assets. The potential conflicts between historic design and energy efficiency were highlighted in comments against **PO3**. If the policy approaches suggested also applied to conversions of older buildings then there was concerns for the potential loss of important features, for instance windows. Similarly, in respect of the generation of renewable energy (**PO4**), there was the potential for a negative impact in terms of inappropriate development in, on and around heritage assets. In these circumstances, there was a need to follow guidance of PPS5 and English Heritage. Two policy options that dealt with adapting to Climate Change (**PO5 & 6**) had a potential impact, and in both cases the quality of design within historic environment must be taken into account.
- 11.35** Delivering employment land in accessible locations to meet employers needs (**PO8**) could potentially conflict with heritage assets, conservation areas and sites of historic significance, although it was uncertain as to the actual impact. Encouraging innovation and diversification of both the urban and rural economies (**PO9**) was felt to have a generally positive impact, providing that the historic environment is considered as an integral part of any scheme. In terms of the impacts of the policy options concerned with the creation of vibrant, lively town centres, retail, and improving quality (**PO10&11&13**) there was a positive impact predicted, again providing that the historic environment is considered as an integral part of any scheme. There was an uncertain impact predicted from other town centre uses (**PO12**), but with either option in this policy, the quality of design within historic environment must be taken into account.
- 11.36** **PO16** and the housing number options could have a potential negative impact, as there was potential conflict with heritage assets, conservation areas and sites of historic significance. The impact on the SA objective from **PO17** was uncertain, as the quality of design within historic environment must be taken into account when deciding on the provision of a range of dwelling types, sizes and prices. Another uncertain impact was predicted from **PO18**; the quality of design within historic environment must be taken into account when designing good quality residential developments. In terms of Housing Renewal, demolition of terraces is not encouraged by English Heritage. **PO26,27 & 28** were all considered to positively support the SA objective, as was **PO29**, providing the quality of design within historic environment was taken into account when improving the safety and accessibility of new developments.
- 11.37** There was a positive impact predicted from **PO33**, again with the proviso that the historic environment is considered as an integral part of any scheme in relation to reducing the differences in health, quality of life, and economic prosperity.
- 11.38** All three Mineral Site Allocation Policies (**MW3,4&5**) had a potential impact, as there was a potential conflict with heritage assets, conservation areas and sites of historic significance. This was also the case with the location (**MW10&11**) and scale (**MW12&13**) of new waste facilities. Protecting Environmental Resources (**MW14&15**) was suggested to have a positive impact on the SA objective, although 'Registered Parks and Gardens' should be added to the list. Additionally, PPS5 requires protection of all heritage assets, so it was suggested that the policy wording be amended to include 'other heritage assets'. An uncertain impact was predicted from **MW18&19**, as along with other design considerations, when considering waste storage and separation areas in new developments, the historic environment needs to be considered as an integral part of any scheme.

Table 11.6 - Summary of impacts on SA7 The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Sustainable development (SO1); Considering the historic environment as an integral part of any scheme (SO3); Protecting and enhancing the historic environment (SO6);	Inappropriate development in, on , or around heritage assets (SO2); Impact of transport facilities (SO7); Potential conflict with conservation areas and historic sites (SO9);	Quality of environment not considered (SO4);
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
	Potential conflict with heritage assets, conservation areas, and sites of historic significance (Spatial Options 1,2,3, & 4)	
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
Reusing existing buildings (PO1); Encouraging business innovation and diversification (PO9); Considering the historic environment as an integral part of town centre schemes (PO10,11,&13); Protecting and enhancing the historic environment (PO26); Promoting high quality design in new developments and the existing public realm (PO27&28); Taking account of the historic environment when improving accessibility and safety of developments (PO29); Taking account of the historic environment in schemes intended to reduce the differences in health, quality of life, and prosperity (PO33); Protecting environmental resources (MW14&15).	Some sustainable principles may conflict with the SA objective (PO1); Potential conflicts between historic design and energy efficiency (PO3); Adapting to climate change (PO5&6); Delivery of employment land (PO8); Non retail town centre uses (PO12); Provision of a range of dwelling types, sizes, and prices (PO17); Residential developments must take quality of design within the historic environment (PO18); Demolition of terraces not recommended (PO18); Minerals Site Allocations and conflicts with heritage assets, conservation areas, and sites of historic significance (MW3,4&5); Location and scale of waste facilities (MW10,11,12&13); Designing waste storage and separation areas in new developments (MW18&19).	Concerns for the loss of important features (PO4); Housing number options could lead to potential conflict with the SA objective (PO16);

Impact on SA 8 "To Reduce the Risk of Flooding and Resulting Detrimental Effects on People and Property"

- 11.39** In general it was considered a positive aspect of the Core Strategy Refined Issues and Options that there was recognition of other flood risks in addition to main rivers, and that recognition needs to be translated into planning policies in the Local Plan. National policy requires all development to take flooding of all types into account (at an appropriate level of detail). Natural methods of flood protection such as upland land management, and the creation of washland and flood storage basins are suggested as the only real options to increase protection in areas such as Hebden Bridge where 'hard engineered' schemes are difficult to justify.
- 11.40** In terms of specific comments, it was felt that the second sustainable development option presented in **PO1** was preferable in terms of supporting the SA objective, whilst a number of issues were received in relation to Flood risk management (**PO5**). It was felt that the policy should be more prescriptive in relation to limiting surface water discharge. This should reflect the Planning Policy Statement 25 'Development and Flood Risk' escalating approach, with a recommendation setting out target levels. In order to avoid a negative impact on the SA objective there would be an urgent need to adopt such a policy that restricts surface water run off if all current national policy is withdrawn and replaced by the National Planning Policy Framework (NPPF). A suggested level was that greenfield or cleared brownfield sites should be restricted to greenfield surface water discharge rates. Where a brownfield site which retains the buildings and integrity of the drainage infrastructure (e.g. Mill conversions) is developed, this type of site should be required to reduce peak discharge by a minimum 30%.
- 11.41** In order to make a positive impact on this SA objective it was also requested that **PO5** should do more than 'encourage' developers to adopt sustainable drainage systems. A further positive impact from **PO5** concerned the proposal to identify opportunities to utilise areas for flood risk management alongside restoring the natural floodplain to its original function as well as using open space in the flood plain for flood water storage. It was felt that such an approach would benefit the Upper Valley especially since at present there are few opportunities for reducing flood risk other than de gripping moorland⁽¹⁰⁾ and increasing the availability of washland.
- 11.42** As far as adapting to climate change and this SA objective were concerned, it was suggested that an uncertain impact could arise from the proposal in **PO6**, in that inconsistencies between adaptation and mitigation issues on Green Infrastructure, SUDS and the Code for Sustainable Homes would need to be controlled by a more direct means than an EIA. Concern was expressed surrounding the potential of the Special Protection Area (SPA) and Special Area of Conservation (SAC) to mitigate against the aspiration for reducing flooding by de gripping of moorland peat areas, which could have an impact on **PO7** and biodiversity's ability to adapt climate change as well as restrict natural flood protection.

Table 11.7 - Summary of Impacts on SA 8: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options.

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	No Specific Comments

¹⁰ this would reverse the process of gripping which drains the peat moorland

Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	No Specific Comments
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
Overarching Sustainable Development Policy preferred (PO1) Identifying opportunities to utilise areas for flood risk management	Need to be more prescriptive in limiting surface water discharge (PO5); Urgent need to adopt a policy restricting surface water run off (PO5); Required to do more than 'encourage' developers to adopt SUDS (PO5); EIA unlikely to control inconsistencies between mitigation and adaptation (PO6); SPA and SAC could prevent de-gripping the moorland (PO7)	
General Comments		
Positive +	Uncertain ?	Negative X
Positive the document acknowledges that there are other flood risks apart from the main rivers;	The plan needs to promote natural methods of flood protection especially in the upper valley; Hard engineered schemes difficult to justify	

Impact on SA 9 "To Reduce the Impact of Traffic on the Environment"

- 11.43** The principles of sustainable development include minimising of environmental impacts – by definition this means reducing the need to travel, discouraging private car use and promoting sustainable modes of transport, therefore **SO1 (Sustainable Development)** is compatible with this SA objective. Addressing climate change (**SO2**) necessarily includes consideration of travel and transport issues, which make up around 25% of the UK's greenhouse gas emissions. Reducing the need to travel, promoting walking, cycling and public transport and sustainable freight transport are all key actions for reducing carbon emissions.
- 11.44** The impact from **SO3 (Economy & Enterprise)** was considered to be uncertain, on the one hand there is potential for a boosted economy to increase traffic volumes by bringing more activity into the area. Alternatively, there is the potential for economic prosperity to attract funding for improvements to the transport network which promote the use of sustainable travel modes. Similar uncertainties were expressed in terms of **SO4 (Housing)**. Housing Objectives and Policy have the potential to reduce or increase traffic volumes, depending on the locations chosen for new housing. Likewise, location and proximity to existing transport networks will dictate the impacts upon rates of walking, cycling and public transport use.
- 11.45** The **SO5 (Green Infrastructure and the Natural Environment)** objective could help improve the uptake of walking and cycling in Calderdale by providing a more appealing environment in which to carry out these activities, whilst achieving the **SO7 (Transport objective)** will reduce traffic volumes and improve the transport networks to encourage greater use of

sustainable modes. In terms of **SO10 (Waste)**, the impacts on the SA Objective will depend on the location of new waste management facilities, as this would potentially increase or decrease traffic volumes in some areas.

- 11.46** As far as the impacts of the Spatial Options on this objective were concerned, **Spatial Option 1 (Focus on Eastern Calderdale)** has the potential to increase traffic volumes in eastern Calderdale by bringing development and increased employment opportunities to the area. In particular, development in the Northowram and Shelf area would be likely to increase traffic volumes in the Halifax/Bradford corridor, as there is no rail provision in this area to accommodate commuter journeys. On the other hand, concentrated development in this area could provide a boost for the public transport, walking and cycling networks. **Spatial Option 2 (Enhancing the Role of Todmorden)** has the potential to increase traffic volumes in the Todmorden area by bringing development and increased employment opportunities. However, there is a requirement in this option to include good accessibility by public transport as well, which would likely increase public transport use in the area.
- 11.47** **Spatial Option 3 (Enhancing the Role of Elland)**, has the potential to increase traffic volumes in the Elland area by bringing development and increased employment opportunities. However, reintroduction of a railway station is included in the proposal, and there is a requirement to improve accessibility by public transport. This would have a positive impact on public transport use in the area. If **Spatial Option 4 (Current Role and Function)** was pursued, the effects on traffic and transport networks would depend on the detail of each development undertaken.
- 11.48** In terms of the impacts on the SA objective from the Policy Options, the majority of specific comments were positive. **PO1** would have a positive impact as the principles of sustainable development include minimising of environmental impacts – by definition this means reducing the need to travel, discouraging private car use and promoting sustainable modes of transport. **PO2** could help to reduce traffic volumes by introducing Park & Ride and other measures to discourage private car use. It would also encourage greater rates of walking, cycling and public transport use and ensure that new developments provided easy access to these travel modes. The option also includes measures to enhance green infrastructure, potentially providing more safe walking and cycling routes.
- 11.49** Supporting biodiversity to adapt to Climate Change (**PO7**) promotes green infrastructure to create joined up natural spaces for biodiversity. This may also have the effect of improving the appeal of walking and cycling in Calderdale, and providing safer routes – thereby increasing accessibility by these modes. Improving the quality of town centres (**PO13**) could reduce traffic volumes around town centres through well-designed transport policies, and encourage journeys by modes other than the car. It could encourage more walking trips into town centres and improve walking access to services.
- 11.50** The Low Carbon economy policy (**PO15**) aims to encourage sustainable freight movements and promote travel plans for new developments. Green Infrastructure policies (**PO21,22,23,24 & 25**) were thought to have the potential to improve take up of walking and cycling, and improve access to services by these modes. As a knock on effect this may help to reduce traffic volumes in some areas. Raising the standard of design in the urban realm, including streets, as promoted by **PO28** could lead to improvements on the road network for mixed travel use, including walking and cycling.
- 11.51** Ensuring places are properly connected (**PO30**) through locating development more densely in fewer locations will help to reduce traffic volumes by concentrating housing, facilities and employment near to each other. Ensuring that new development takes advantage of existing sustainable transport facilities will help to increase uptake of walking, cycling and public transport modes. All the options in **PO31** are designed to reduce traffic volumes by shifting travel away from the private car. The focus is on ways to increase the proportion of journeys using modes other than the car, and will therefore help to increase uptake of walking, cycling

and public transport modes. The inclusion of a requirement to improve infrastructure for walkers and cyclists will help to improve access to services by these modes. Proposals for park and ride and other improvements to public transport facilities will help to encourage greater use of public transport as well as providing better access to services. A positive impact on the SA objective was also suggested from **PO32** and reducing the need to travel.

- 11.52** Support was expressed for Mineral Site Allocation Policy Options (**MW3,4 & 5**) as all of these options included the proposal that minerals related transport should make full use of sustainable forms of transport. In relation to the Minerals and Waste Policy Options, **MW12** was considered to have a potential positive impact, as a small number of larger scale waste facilities within or adjacent to main urban areas would limit the transportation required for treatment of waste, therefore contributing to a reduction in traffic volumes. However, a potential negative impact emerges from the location of sites, as depending on how **MW13** is applied this could lead to an increase in transportation of waste to dispersed treatment facilities. Traffic and Access and Highway Capacity are criteria identified in **MW14 & MW15** respectively, therefore the impact of new waste management facilities on traffic volumes should be managed. **MW16 & MW17** both ensure the localised impact of waste transportation is minimised; and support was given for the suggestion in the policy to welcome innovation in sustainable waste transportation.

Table 11.8 - Summary of Impacts on SA 9: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Reducing the need to travel (SO1,2); Promoting sustainable travel (SO1,2); Encouraging the uptake of walking and cycling (SO5); Reduce traffic and improve transport networks (SO7)	Increased economic activity may increase traffic volumes (SO3); Increased economic activity may fund improvements to the transfer network (SO3); Dependent on locations, new housing could increase or reduce traffic volumes (SO4); The impact of waste facilities will be dependent on their location (SO10)	
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
	Increased traffic volumes in eastern Calderdale (Spatial Option 1); Development in Northowram and Shelf likely to increase traffic (Spatial Option 1); Focusing development in Eastern Calderdale would support Public Transport (Spatial Option 1); Increased traffic volumes in Todmorden, but improved public transport (Spatial Option 2);	

	Increased traffic in Elland, but potential to improve public transport (Spatial Option3); Uncertain impact of current role and function (Spatial Option 4).	
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
Minimising environmental impacts (PO1); Park and Ride, sustainable travel (PO2); Enhance Green Infrastructure (PO2, PO21,-25); Improving town centres (PO13); Sustainable Freight Movements (PO15); Improving the Urban Realm (PO28); Dense and mixed use development in fewer locations (PO30); Making use of existing sustainable transport facilities ((PO30); Increase the proportion of non car journeys (PO31); Reducing the need to travel (PO32); Sustainable Mineral Transport (MW3,4,5); Waste facilities within or adjacent to main urban areas (MW12); Managing the traffic impact of waste facilities (MW14,15,16,17).		Depending on location of sites, there could be increases in the transport of waste (MW13).

Impact on SA 10 "To protect and enhance biodiversity" and SA 12 "To protect and enhance the natural, semi natural and man made landscape".

11.53 As far as potential impacts on these SA objectives, both **SO1 (Sustainable Development)** and **SO2 (Climate Change)** were considered to have a positive impact, as the principles of sustainable development, including protecting and enhancing biodiversity, and reduced emissions should, in the long term, reduce the negative impacts on biodiversity. In relation to **SO3 (Economy & Enterprise)** an environment rich in biodiversity is perhaps more likely to be valued in a thriving economic environment, whereas in connection with **SO4 (Housing)** there is uncertainty at this time as to whether new developments may result in biodiversity gain or loss. An additional comment in terms of housing policy stated that previously developed land may have existing biodiversity value.

11.54 Green infrastructure (**SO5**) offers great opportunities to protect and enhance biodiversity, but it was felt that there was unlikely to be an impact from **SO6 (Historic Environment and Design)**, providing new development and refurbishment take biodiversity into account. Achievement of the transport objective (**SO7**) could result in fewer wildlife fatalities and less demand for new or faster roads, both of which have a negative impact. As far as the Minerals

(SO9) and Waste (SO10) objectives are concerned, it was considered that restoration of mineral sites can result in biodiversity gains, while limiting the number of new landfill sites through sustainable waste policies may mean a lower impact on biodiversity.

- 11.55** There were a number of comments on the impacts of the Spatial Options on the SA Objectives. It was pointed out that if **Spatial Option 1 (Focus on Eastern Calderdale)** was pursued, Eastern Calderdale, including the urban areas, has already suffered greater biodiversity declines than most other parts of Calderdale. Further development will put biodiversity under greater pressure unless positive measures are taken to protect and enhance biodiversity. There is likely to be increased recreational pressure on the internationally important South Pennines Special Protection Area (SPA)/Special Area of Conservation (SAC), particularly in the vicinity of Ovenden. This would also be the case for **Spatial Option 3 (Enhance the Role of Elland)**.
- 11.56** The above comments on **Spatial Option 1 (Focus on Eastern Calderdale)** also apply for development in Halifax and Brighouse if **Spatial Option 2 (Enhancing the Role of Todmorden)** was chosen. Todmorden, especially areas adjacent to the water courses, has suffered great biodiversity declines and further development will put biodiversity under greater pressure unless positive measures are taken to protect and enhance biodiversity. There is likely to be increased recreational pressure on nearby parts of the internationally important South Pennines SPA/SAC as well as Todmorden Moor and environs. It was suggested that the approach under **Spatial Option 4 (Current Role and Function)** and spreading development across Calderdale may mean that negative biodiversity impacts are easier to avoid.
- 11.57** The following comments were submitted against individual Policy Options; the first section concentrates on those policy options considered to have a potential **positive** impact on the SA objectives. Applying **PO1** would support the principles of the SA objectives as sustainable development includes protecting and enhancing biodiversity. As with **SO7 (Transport)**, **PO2** could also result in fewer wildlife fatalities and less demand for new or faster roads, which can have a negative impact. Additionally, new cycle routes and footpaths need to ensure there are no negative impacts on biodiversity.
- 11.58** Well informed and planned approaches will be of great benefit to biodiversity adapting to climate change (**PO7**), however a 'flexible approach' could imply it's optional, therefore any policy would need to be clear. Policy options relating to Green Infrastructure and the Natural Environment, (**PO20,21,22,23, and 24**) were considered to have a positive impact on the SA objective. Potential for biodiversity gain needs to be fully considered in **PO20**, and the potential of **PO21** to secure Green infrastructure enhancement offers great potential for biodiversity enhancement, but potential negative impacts need to be fully considered and minimised. It was considered that identifying under utilised assets (**PO22**) offers a positive impact, though the impact of increased recreation needs to be assessed. In ensuring a joined up network of Green Infrastructure (**PO23**), the enhancement and retention of biodiversity will be vital. Impacts of recreation, including walking and cycling, need to be carefully considered. In ensuring that a positive impact is secured through policies that have regard to the economic, social and environmental benefits of green infrastructure (**PO24**), careful planning using up to date biodiversity data is essential. Reduced road traffic through reducing the need to travel in **PO32** is likely to have a beneficial impact. Restoration of mineral sites (**MW6**) can result in large biodiversity gains and a positive impact.
- 11.59** The following have been considered to either have an **uncertain or no potential** impact on the SA objective. The energy efficiency of new development (**PO3**) was considered unlikely to have an impact, though energy efficiency measures need to take biodiversity into account to avoid any negative impacts. Flood risk management measures (**PO5**) can have an adverse or positive impact, depending on whether biodiversity has been fully considered, which is also the case when adapting to climate change through urban design in **PO6**. Developing land currently used for employment (**PO8**) is unlikely to have an adverse impact on biodiversity.

Further development can result in biodiversity gain if fully considered. In terms of **PO9**, urban areas often have limited biodiversity to begin with, therefore any loss can have a high impact. However, there are opportunities for biodiversity gain. Through improving the quality of town centres (**PO13**) small scale biodiversity enhancement and raising awareness of biodiversity (e.g. through native planting) may result in a slight positive, but overall the impact would be uncertain.

11

- 11.60** Focusing economic development (**PO14**) on certain areas may mean a higher risk of negative biodiversity impact, while development of a low carbon economy (**PO15**) could result in fewer wildlife fatalities and less demand for new or faster roads.
- 11.61** In terms of housing (**PO16**), it was difficult to predict either a definite positive or negative impact as new developments may result in biodiversity gain or loss, although high standards of sustainability (**PO18**) are likely to minimise biodiversity loss and maximise gain. The impact of Gypsy and Traveller policies (**PO19**) were likely to be low if any biodiversity impact was fully considered. In terms of identifying the functional role of green infrastructure (**PO25**), it is important that negative impacts on biodiversity of tree planting, walking routes and cycling routes are fully considered.
- 11.62** Historic sites (**PO26**) can have great biodiversity value, and restoration works need to carefully consider their impact on biodiversity. In promoting high quality design (**PO27 & PO28**), it was considered likely that innovative / effective biodiversity enhancement measures would be incorporated.
- 11.63** There was also uncertainty expressed concerning the impacts from some of the transport policy options. Ensuring places are properly connected with increased travel sustainability (**PO30 & 31**) is likely to be of benefit to biodiversity. New transport infrastructure, including walking and cycling routes, should consider the ecological impact. In relation to social issues (**PO33**), a healthy, more equal society may result in greater appreciation of Calderdale's biodiversity, though again the impact was considered uncertain.
- 11.64** Mineral working (**MW1 & MW2**) can have a beneficial impact on biodiversity, providing negative impacts are minimised and restoration plans maximise biodiversity enhancement. Mineral Safeguarding Areas (MSA) should be subject to biodiversity surveys which identify key sites for biodiversity. In relation to Mineral site allocation policy options **MW3,4 & 5**, favouring mineral working on sites where biodiversity enhancement is an integral part of restoration would be beneficial, until these are known the impact is uncertain. Remaining with the restoration of mineral sites (**MW7**), the potential impact of recreational activities on biodiversity should be carefully considered. Existing and potential biodiversity value should be considered in the site selection process (**MW8 & MW9**). When considering the location of new waste facilities (**MW10**), ecological impact assessments should be undertaken, with an acknowledgement that brownfield sites can have a high biodiversity value. In terms of waste facilities and protecting environmental resources (**MW14 & MW15**), the opportunities for biodiversity gain should also be considered.
- 11.65** The only policy option considered to have a **potentially negative impact** on the SA objectives was **PO4**. Specifically, wind turbines can have an adverse impact on biodiversity, especially breeding birds and bats. Research, special planning and detailed ecological impact assessments can minimise this impact. Hydro schemes should include measures to improve fish and mammal passage.

Table 11.9 - Summary of Impacts on SA 10 & 12: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Protecting and enhancing biodiversity, reducing emissions (SO1,2); Opportunities through Green Infrastructure for biodiversity (SO5); Sustainable transport (SO7); Restoration of mineral sites (SO9); Limiting new landfill sites (SO10)	Environment more valued in a thriving economy (SO3); New housing developments (SO4)	
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
	Positive measures to protect and enhance biodiversity required to avoid greater pressure on biodiversity in eastern Calderdale (Spatial Option 1,2,3); Increased recreational pressure on SPA / SAC (Spatial Option 1,2,3); Positive measures to protect and enhance biodiversity required to avoid greater pressure on biodiversity in Todmorden (Spatial Option 2); Increased recreational pressure on Todmorden Moor (Spatial Option 2); Easier to avoid negative biodiversity impacts by spreading development across Calderdale (Spatial Option 4)	
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
Sustainable development (PO1); Sustainable transport (PO7); Clear policy on biodiversity and climate change (PO7); Protecting and enhancing Green	Energy efficiency measures (PO3); Flood risk management (PO5); Urban design adapting to climate change (PO6); Developing land currently used for employment (PO8); Development may further reduce the limited biodiversity in urban areas (PO9); Potential for small scale biodiversity enhancement (PO13);	Wind turbines can have a negative impact on biodiversity; Hydro schemes need to have

<p>Infrastructure (PO20-24); Reducing road traffic (PO32); Restoration of Mineral Sites (MW6);</p>	<p>Focusing economic development on certain areas (PO14); Low Carbon Economy and sustainable freight transport (PO15); Housing development could result in biodiversity gain or loss (PO16); High standards of sustainability may minimise loss and maximise gain (PO18); Consider negative impacts of tree planting, walking & cycling routes (PO25); Biodiversity needs considering when restoring buildings (PO26); Assume that Incorporating innovative / effective biodiversity enhancement measures would take place (PO27,28); Increased travel sustainability (PO30,31); Mineral working impacts and Mineral Safeguarding Areas (MW1,2); Mineral Site Allocations (MW3,4,5); Impact of recreational activities on restored sites (MW7); Consider biodiversity value during site selection process (MW8,9); Ecological impact of new waste facilities (MW10); Opportunities for biodiversity gain should be considered (MW14,15)</p>	<p>measures to improve fish and mammal passage</p>
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Impact on SA 11 "To reduce pollution levels and CO2 emissions to target levels"

- 11.66** The potential impact of **SO1 (Sustainable Development)** was uncertain as it would be dependent on the meaning and how it would be applied. Similarly in terms of **SO2 (Climate Change)**, as long as the objective and related policies are well developed, robust, and applied effectively then it could make strong positive contributions to the SA objective. However there is insufficient detail in the policy at this time to make a judgement.
- 11.67** **SO3 (Economy & Enterprise)** was considered to have an uncertain impact, since a more prosperous economy may provide for higher environmental standards and more locally sourced products, or may increase emissions from transport, and an increase in energy demand.
- 11.68** Comments were supplied in relation to **SO5 (Green Infrastructure and the Natural Environment)**. Although green infrastructure can act as a carbon sink the scale of impact will be minimal. The built environment can impact on the quality of green infrastructure, however in these cases, the associated impact on emissions would be negligible, with the exception being the impact on peat moorland, which may have a more significant impact if badly managed. Well managed woodlands could provide local renewable biomass fuel, however there is no mention of this in the policy at this stage. In general the scale of green infrastructure's effect on CO₂ emissions will be minimal. Air and water quality may have more relevance, but there is insufficient detail in the Objective and policy to determine the impact.
- 11.69** Comments on **SO6 (Historic Environment and Design)** pointed to the negative impact of failing to allow for cost effective energy efficiency improvements and installations in the historic

environment. Additionally, building works and renovation on historic environment can impact on emissions and the use of renewable materials depending on the quality of sustainable construction.

- 11.70** There is potential to reduce emissions and increase air quality through a modal shift away from the car, and to reduce the need for travel. The effectiveness of **SO7 (Transport)** and related Policies depend on details not available at this time.
- 11.71** One set of comments on the impact of the **Spatial Options** felt that the potential to reduce greenhouse gas emissions from vehicles and the built environment depends on public transport provision, vehicle types and standard of construction. The standard of construction would also play a significant role in the built environments impact on sustainable construction, the use of locally sourced and renewable materials, as well as improving air and water quality. This was also the case with **SO4 (Housing)**.
- 11.72** Against this SA objective, comments were also received in relation to Mineral Site Allocation Policies (**MW3,4, & 5**). It was suggested the proposals may reduce emissions through sustainable freight transport, may improve the availability of locally sourced renewable materials, and could improve air quality through sustainable freight transport.

Table 11.10 - Summary of Impacts on SA 11: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objective		
Positive +	Uncertain ?	Negative X
	<p>Dependent on the meaning of Sustainable development and how it will be applied (SO1);</p> <p>Insufficient detail in the Climate Change policy at present (SO2);</p> <p>Uncertain impact of prosperous economy (SO3);</p> <p>Dependent on public transport provision, vehicle types and standards of construction (SO4);</p> <p>Green Infrastructure impact minimal (SO5);</p> <p>Peat moorland may have a negative impact if badly managed (SO5);</p> <p>No mention of managed woodlands supplying local renewable fuels (SO5);</p> <p>Uncertain impact if failure to allow energy efficient improvements and sustainable construction in the historic environment (SO6);</p> <p>Effectiveness of transport policies depends on details not available (SO7);</p> <p>Reduce emissions through sustainable freight transport, and improve availability of locally sourced renewable materials (MW3,4,5)</p>	
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
	<p>Dependent on public transport provision, vehicle types and standards of construction (Spatial Options 1,2,3,4)</p>	

Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
	Reduce emissions through sustainable freight transport, and improve availability of locally sourced renewable materials (MW3,4,5)	

Impact on SA 13 "To ensure prudent and efficient use of natural resources and energy".

- 11.73** The impact of **SO1 (Sustainable Development)** depends on how the Objective and related policies would be applied, though it has the potential to ensure increased use of renewable energy through application of sustainable development policies. The same applies to reducing resource consumption.
- 11.74** If **SO2 (Climate Change)** and related policies are well developed, robust and applied effectively then it could make strong positive contributions to the SA objective. However it was felt there was insufficient detail in the policy at this stage to make a judgement.
- 11.75** The impact of **SO3 (Economy & Environment)** was considered to be uncertain; for example a more prosperous economy may lead to an increase in energy and resource demand for transport and developments, however a strong economy may also allow for investment in energy efficiency measures. National policy measures, energy cost & security will be also be a major factor in meeting the aims of the SA objective. A more prosperous economy may provide for higher environmental standards or may lead to greater environmental demands from development.
- 11.76** Renewable energy use, and therefore its impact on this SA objective, depends on the standard of construction which is not specified in the housing objective (**SO4**) policy, as well as the behaviour of users.
- 11.77** **SO5 (Green Infrastructure and the Natural Environment)** identifies a role for the provision of renewable energy (Biomass); however there are no indicators or policy options to deliver that aim. Green infrastructure could deliver microclimate control but again there are no indicators or policy options to deliver this aim.
- 11.78** Objective **SO6 (Historic Environment and Design)** could potentially have a negative impact if there was a failure to allow for cost effective energy efficiency improvements and installations in historic environment. Building works and renovation on historic environment can impact on energy use depending on the quality of construction, and the impact is also dependent on conservation limitations.
- 11.79** The impact of the **Spatial Options** on this SA objective was considered uncertain. The production and use of renewable energy will depend on the standards of construction applied to developments, as will the energy and resource efficiency of buildings. Another factor would be the energy use behaviour of the buildings users. Reduced use of primary aggregates and recycling of materials will also depend on the standards of construction applied to developments.
- 11.80** **MW3,4 & 5** were considered to have the potential to lead to the recycling of materials and make for improved availability of locally sourced renewable materials.

Table 11.11 - Summary of Impacts on SA 13: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objective		
Positive +	Uncertain ?	Negative X
	Unclear how Sustainable development will be applied (SO1); Insufficient detail in the Climate Change Policy at present (SO2); Uncertain impacts from a prosperous economy (SO3); Housing impact dependent on standards of construction (SO4); No policy options proposed to deliver renewable energy through Green Infrastructure or micro climate control (SO5); Uncertain impact if failure to allow energy efficient improvements and sustainable construction in the historic environment (SO6)	
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
	Dependent on the standards of construction and energy efficiency (Spatial Options 1,2,3,4)	
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
	Mineral Site allocations could potentially increase recycled materials and improve availability of local renewable materials (MW3,4,5)	

Impact on SA 14: "To Ensure Efficient Use of Land".

- 11.81** Given the strategic nature of the Core Strategy, it was difficult to say with certainty the potential impacts on this SA objective. However, it was considered that **SO1(Sustainable Development)** would make a positive contribution to the SA objective. Certain aspects of planning for climate change (**SO2**) may have an uncertain impact, and can highlight tensions between mitigation and adaptation. For example adapting to the potential impacts may require a lower density of development than has been experienced recently. Alternatively, a high density pattern of development can encourage public transport use. There was also an uncertain impact from **SO3(Economy and Enterprise)**, as the use of land would be dependent on the future locations of businesses, and whilst it was considered that reduced transport costs for businesses could occur as a result of complementary activities, it was not possible to say for certain from the objective that this would indeed happen.
- 11.82** In terms of **SO4 (Housing)**, as the objective calls for a meeting of the housing need by maximising the use of previously developed land, along with an efficient use and improvement of the existing housing stock, a positive impact was predicted. Protecting and enhancing green infrastructure (**SO5**) often focuses development towards brownfield sites – therefore it has the potential to have a largely positive impact on this SA Objective; however, some brownfield sites can have a biodiversity / green infrastructure value, and these may be isolated

in the green belt. Overall though, in terms of efficient use of land, ensuring a green infrastructure network that is properly connected can make a positive impact on this SA Objective. The impact of **SO6 (Historic Environment and Design)** on the SA objective is considered positive, as protecting and enhancing the district's historic environment can in some circumstances ensure redundant buildings are brought back into use. Reducing the need to travel (**SO7**) would ensure that the SA objective was supported, as this would promote mixed use developments that offered a range of services and facilities in close proximity to each other. It was unclear as to the impact of **SO8 (Communities and Narrowing the Gap)**, whilst the minerals objective (**SO9**) could potentially support the SA objective, by encouraging the efficient use and recycling of minerals, as well as promoting the restoration of mineral sites for a beneficial after use, though overall at this stage it was uncertain. Likewise, the waste objective (**SO10**) impacts were considered uncertain at this stage.

- 11.83** Whichever of the Spatial Options were chosen, the impact on this SA objective would depend largely on the final make up of the sites, and all of them would require greenfield sites for development; therefore the overall impact of all of the Spatial Options was considered to be uncertain. In terms of **Spatial Option 1 (Focus on Eastern Calderdale)**, it would utilise the proximity to the motorway and main railway stations by maximising the potential for employment growth. In some instances this could have a positive impact on the SA objective, as the majority of large brownfield sites lie within this part of the district. **Spatial Option 2 (Enhance the Role of Todmorden)** would require significant growth in housing, employment and services. This option could have the knock on effect of bringing empty properties back into use. Potentially, there are fewer larger sites in the Upper Valley, which could result in a higher density of development if this option is chosen, which again supports this objective, although this has to be balanced against suitable design to avoid unattractive development. **Spatial Option 3 (Enhance the Role of Elland)** could provide the impetus to the regeneration of Elland town centre, which in turn could bring empty properties back into use and support this objective. The extent to how positive the impact would again be dependent on the make up of sites and the types of development delivered. Continuing with the current role and function (**Spatial Option 4**) would still require growth in housing employment and services. This option would continue to direct development towards the main centres and provide opportunities for bringing empty buildings and vacant sites back into use, and would therefore support this objective.
- 11.84** Whichever sustainable policy option (**PO1**) is pursued, sustainable development principles will support the SA Objective. **PO2** was viewed as supporting the SA objective through encouraging sustainable transport in terms of promoting the use of green infrastructure which can be viewed as a positive impact, using routes which are already established. Locating new developments in areas accessible by public transport usually require them to be in or adjacent to the main urban areas where the majority of brownfield development sites are located. There may be a conflict between elements of the SA Objective and flood risk (**PO5**) – for example bringing some urban brownfield sites back into use may conflict with areas in the higher flood risk zones – alternatively using open spaces for storing flood water can support the objective, since this is bringing land into a 'productive use' and can protect residential and business premises.
- 11.85** Options presented in **PO8** included protecting all existing employment sites and allocations from other development, which could make a positive contribution to the SA objective; alternatively, the options include releasing existing employment allocations and providing areas of search for new sites in the Core Strategy – dependent on the final allocations the impact is at present considered uncertain. It is also recommended there needed to be a reference to brownfield land to have a more positive impact on the SA objective. Elements of **PO9** such as working from home, with improved broadband connections can help make a positive contribution to this objective. The other elements of the policy are more difficult to assess, and will be dependent on the nature of economic innovation and diversification.

However, not identifying a hierarchy could direct development to greenfield sites. Maintaining and strengthening the current role of all existing town centres (**PO10**) would likely be a positive impact on this SA objective, as it would result in directing new development towards the urban areas. Decreasing the role of specific town centres could have a negative impact on this objective, as it would increase the amount of retail development in other centres which may require town centre extensions. Protecting historic buildings (**PO11**) such as the Piece Hall and Markets in Halifax would support the SA objective. Other elements of the policy unclear as to make an assessment at present.

- 11.86** Whichever elements of **PO12** are chosen, directing non retail development to town centres can make a positive contribution to this SA objective. However there needs to be a balance to avoid retail units having to move to out of town / edge of centre locations if there is too much non retail development in town centres. Improving the quality of town centres through **PO13** would encourage disused vacant land back into use; therefore the policy option would have a positive impact on the SA objective. In providing employment opportunities for all (**PO14**), regeneration may bring disused / vacant buildings back into use, although the impact would depend on the nature of each development.
- 11.87** Until the housing sites are allocated and the housing mix policies are in place, the impacts from both **PO16** and **PO17** were classed as uncertain. Adopting a range of densities across the district (**PO18**) may have a negative impact on the SA objective in parts of the district, but a positive impact elsewhere. Another positive impact would be ensured through improvement and re-use of the existing dwelling stock through housing renewal areas and selective clearance. **PO21** may provide opportunities to bring redundant and vacant land into productive use through securing green infrastructure via developer contributions, however, the extent of the impact will be dependent on the individual developments. Identifying land that is underutilised and bringing it back into productive use (**PO22**) can make a positive contribution to this SA objective, similarly, extending access to informal recreation activities (**PO23**) can have a positive impact, for instance through joining up the green infrastructure network by bringing pockets of land back into use for cycling and walking. One of the options in **PO25** discusses the promotion of green infrastructure to make cycling and walking more attractive; this will support the SA objective in bringing disused spaces back into productive use for the benefit of the local community.
- 11.88** Protecting and enhancing the historic environment (**PO26**) will support this objective, as it will potentially bring under used / vacant buildings back into use. Focusing regeneration in areas of the greatest deprivation may well result in bringing some vacant and underused sites back into productive use, and therefore elements of **PO33** would support the SA objective, though overall the impact is uncertain.
- 11.89** In terms of mineral policies, certain elements of the site allocation policy options (**MW3, MW4, and MW5**), such as supporting extension of existing sites and encouraging the processing of secondary and recycled aggregates will make a positive contribution. Restoration of minerals sites (**MW6 and MW7**) should restore degraded land, and potentially bring spaces into productive use for the benefit of the local community. The majority of the waste policy options were also predicted to have an uncertain impact; the impacts of both **MW10 and MW11** were felt to be uncertain – and dependent on the actual location of new facilities, although the policy option does require that priority be given to brownfield industrial land therefore this could have a positive impact. The impact of **MW12, MW13**, would be dependent on the approach chosen and the location of facilities, whilst **MW14 and MW15** impacts would be dependent on specific proposals and locations of sites. Finally the impacts from both **MW18 and MW19** were considered uncertain.

Table 11.12 Summary of Impacts on SA14 : The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
<p>Sustainable development (SO1);</p> <p>Maximising use of brownfield land and improving existing stock (SO4);</p> <p>Connected Green infrastructure network (SO5);</p> <p>Protecting and enhancing historic environment (SO6);</p> <p>Reducing the need to travel (SO7);</p> <p>Recycling of construction materials (SO9).</p>	<p>Tensions between adaptation and mitigation (SO2);</p> <p>Impact dependent on future locations of businesses (SO3);</p> <p>Communities and narrowing the gap (SO8);</p> <p>Waste objective (SO10).</p>	
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
	<p>Impact dependent on final make up of sites (Spatial Options 1, 2, 3 &4)</p> <p>Regarding all Spatial Options, balance needs to be struck between maximising previously developed land and suitable design.</p>	
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
<p>Sustainable development principles (PO1);</p> <p>Green infrastructure networks and sustainable transport (PO2);</p> <p>Working from home (PO9);</p> <p>Maintaining and strengthening town centres (PO10);</p> <p>Protecting historic buildings (PO11 & PO26);</p> <p>Improving the quality of town centres (PO13);</p> <p>Regeneration schemes (PO14 & PO33);</p> <p>Improvement and reuse of existing dwelling stock (PO18);</p>	<p>Potential conflict with Flood Risk (PO5);</p> <p>Balance needs to be struck on appropriate levels of non retail uses within town centres (PO12);</p> <p>Housing allocations and mix of housing types (PO16 & PO17);</p> <p>Adopting a range of densities (PO18);</p> <p>Impact of new waste facilities dependent on location of sites (MW10 & MW11);</p> <p>Impact of scale of waste facilities dependent on the approach chosen (MW12 & MW13);</p>	<p>Decreasing the role of certain town centres (PO10);</p>

<p>Identifying underutilised land and bringing it back into productive use (PO22); Making Cycling and Walking more attractive options (PO25); Encouraging processing of secondary and recycled aggregates (MW3, MW4 & MW5); Restoration of minerals sites (MW6 & MW7)</p>	<p>Impact on Environmental Resources dependent on specific proposals and location of sites (MW14 & MW15); Impact of designing waste separation and storage areas dependent on individual developments (MW18 & MW19).</p>	
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Impact on SA 15 "To Reduce the Amount of Waste Produced"

- 11.90** In terms of the potential impacts on this SA objective from the **Spatial Options**, none of the options proposed would necessarily have a negative impact as waste would not increase (any greater than if development took place elsewhere in the borough). Focusing on the eastern part of Calderdale (**Spatial Option 1**) means there is a Transfer Loading Station relatively close by in Halifax where waste can be taken to. The eastern part of Calderdale is also near transport links to Bradford, where Calderdale's residual (e.g. 'black bag') Municipal Solid Waste (MSW) waste will be sent to from April 2016.
- 11.91** Should the role of Todmorden be enhanced (**Spatial Option 2**), there is currently a Transfer Loading Station close by at Eastwood where waste can be taken to. However, if this site were ever to cease operation, waste from the Todmorden area would have to travel some distance to Halifax. In addition it is some distance from transport links to Bradford, where waste will be sent to from April 2016. In terms of Enhancing the role of Elland (**Spatial Option 3**), there is a Transfer Loading Station relatively close by at Halifax where waste can be taken to. Similar to **Spatial Option 1**, this Spatial Option would also focus development fairly near transport links to Bradford, where the residual MSW will be sent to from April 2016.
- 11.92** In terms of the waste policy options, Household Waste Recycling Centres (HWRC's) are set out in such a manner that a minimal amount of travel per resident/household is required and this also reduces carbon emissions. Calderdale is also serviced by a number of providers of business/commercial waste throughout the borough. It was considered therefore that applying a broad area of search in the Core Strategy (**MW8&9**) would not have a negative impact on waste collection, and therefore a positive impact on the SA objective, although a flexible approach concerning the locality of sites to allow for changes in waste collection and disposal arrangements was required to avoid certain negative impacts. Both **MW10** and **MW11** were considered to have a potentially uncertain impact on the SA objective, whilst in terms of distributing waste facilities, a dispersal of a number of sites throughout the district (**MW13**) was felt to offer positive benefits to the SA objective, as the geography of the borough required a range of sites to ensure accessibility for all. This would be preferable to a smaller number of large sites (**MW12**) as this may reduce the accessibility of the waste facilities.
- 11.93** Both policy options that were concerned with protecting environmental resources (**MW14 & MW15**) would have a positive impact, as these constraints were necessary to ensure that good quality waste facilities would be provided throughout the borough. Both waste transportation policies were felt to offer positive support to the SA objective. It is important to give due consideration to safe access for the collection and storage of waste and recycling materials, therefore some form of policy based either on **MW18 or MW19** would have a positive impact on the SA objective, as it would potentially increase the recovery and recycling levels of waste through improved waste collection arrangements at newly built households.

Table 11.13 - Summary of Impacts on SA 15: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	No Specific Comments
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
	Equal impacts from all Spatial Options in terms of waste levels	
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
Broad Areas of Search (MW8&9); Flexible approach concerning locality of sites (MW9); Dispersal of waste facilities increases accessibility to them (MW13); Protection of environmental resources (MW14 & 15); Minimising the localised impact of waste transportation (MW16&17) Consideration of safe access for the storage and collection of waste (MW18 & 19);	Impact from the location of new waste facilities uncertain (MW10 & 11); Potential to increase recovery and recycling through improved waste segregation and storage (MW18,19)	A small number of large sites may reduce accessibility and reduce recycling levels (MW12).

Impact on SA 16 "To provide good employment opportunities for all"

- 11.94** Comments on the potential impact of the Core Strategy on this particular SA objective were submitted against the plan as a whole rather than by individual Objective, Spatial Option or Policy Option. However, the most relevant Objectives are **SO3 (Economy & Enterprise)**, **SO7 (Transport)** and **SO8 (Communities and Narrowing the Gap)**. It was suggested that planning policies will have a limited impact in the short term with a much greater influence being the performance of the national economy and the speed of recovery. The majority of employers are reducing employment as the prime means of reducing or controlling their fixed costs and this is likely to continue over the short term. As public sector employment is continuing to reduce, the Council is unlikely to be able to influence the availability of good quality employment opportunities in the short term, but hope to be able to support job growth in the medium to longer term as our economy grows more service sector and related jobs. The ability of the Local Plan to influence this development will be a crucial factor.
- 11.95** To some extent, the potential impact on employment opportunities for disadvantaged groups will be influenced by factors such as the provision of specific support, which local authorities are less likely to be able to fund in the short to medium term. The majority of people from disadvantaged groups are likely to continue to find it more difficult to find employment and it

is hard to envisage how the Local Plan can significantly alter this situation.

11.96 A reduction in commuting out of the district may occur over the long term if the local economy is able to increase the total number of jobs available in the district and the workforce skills rise to meet employers' needs and expectations. Short term, it is likely to see commuting out of the district remain the same or increase as neighbour councils increase the amount of employment development they are able to support relative to Calderdale, whilst Leeds and Manchester maintain their roles as major employment growth centres. The impact of environmental influences and rising fuel costs and impacts might reduce our traditional reliance on commuting to find employment.

11.97 In terms of increasing income, this may improve if economic growth and diversification is able to be supported over the medium to longer term by the Local Plan. If our economy makes a significant transition from a reliance on lower paid employment to more innovative and competitive businesses, the gap between high and low earners might reduce. There are likely to be wider influences on the gap narrowing including raising the skills and ambitions of our more disadvantaged residents and provision of accessible and affordable training and further education.

Table 11.14 - Summary of Impacts on SA 16: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	No Specific Comments
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	No Specific Comments
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	No Specific Comments
General Comments		
Positive +	Uncertain ?	Negative X
If the Core Strategy can support an increase in local jobs and skills rise to meet employers needs then a reduction in out commuting will occur over the long term; Supporting economic growth and diversification which will increase income over the long term	Planning Policies will have limited impact in short term; Medium to long term influence crucial to economic development; Uncertain as to how the Core Strategy will impact on employment opportunities for disadvantaged groups;	

	Out commuting likely to remain the same or increase in the Short term; Wider influences on narrowing the gap beyond the Core Strategy	
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Impact on SA 17 "To achieve business success, sustainable economic growth, and continued investment".

- 11.98** Like SA 16, comments on the potential impact of the Core Strategy on this particular SA objective were submitted against the plan as a whole rather than by individual Objective, Spatial Option or Policy Option. Again, the most relevant Objectives are **SO3 (Economy & Enterprise)**, **SO7 (Transport)** and **SO8 (Communities and Narrowing the Gap)**. The potential for the Local Plan to allow the growth of existing firms is considered uncertain in the short term, as sustainable economic growth relies on a multiplicity of factors other than spatial land allocation and supply and full recovery from recession is likely to take longer than 5 years. In the short term our ability to support a relatively more buoyant manufacturing sector will be important to the performance of a significant part of the Calderdale economy; additionally the quality of our support for innovation, planning for the provision of modern employment space and good access to skills will all be important factors if we are to succeed. The emerging knowledge based economy is less sensitive to land allocations and is subject to complex influences such as innovation potential, adaptability of management, workforce skills, knowledge invested in the business and exploitation of larger national and international markets. It is anticipated that in the medium to longer term Calderdale will be able to adapt successfully to these challenges as the importance of successful adaptation is recognised by local, regional and national agencies and government.
- 11.99** More limited supply of development ready land and a depressed economy will reduce our inward investment performance over the short term. More gradual change in the local economy to a knowledge based economy is likely to attract new businesses located in town centres and on fringes of towns. This is more likely to improve our attractiveness as a location for some new businesses and our heritage and environmental qualities are higher than the average. Our position as a relatively minor partner in the Leeds City Region Inward Investment effort is a disadvantage, although our location between two large city regions could be a longer term advantage if we can improve our skills base and access to higher level learning.
- 11.100** It is difficult to assess the impact on business resilience and economic performance, since despite some factors mentioned above having importance in the district's economic resilience, the economy will also be subject to macro economic influences over the plan period which the Council cannot influence.

Table 11.15 - Summary of Impacts on SA 17: The following table summarises the impacts of the Core Strategy Strategic Objectives, Spatial Options, and Policy Options

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	No Specific Comments

Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	No Specific Comments
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
No Specific Comments	No Specific Comments	No Specific Comments
General Comments		
Positive +	Uncertain ?	Negative X
	<p>Uncertainty over potential of the Core Strategy to allow growth of existing firms in the short term;</p> <p>Important to support the manufacturing sector in the short term;</p> <p>Supportive policies required in the short term for innovation, modern employment space and access to training;</p> <p>Complex influences on a 'knowledge based economy';</p> <p>Limited supply of development ready land will reduce inward investment;</p> <p>Impact of transformation to a knowledge based economy;</p> <p>Local economy is subject to macro economic influences which the Council cannot influence.</p>	

Impact on SA18 : "Enhance the viability and vitality of the Town Centres"

11.101 It was considered there would be a positive impact from the Strategic Objective **SO1 (Sustainable Development)** on this SA objective, as Sustainable development is fundamentally about enhancing and sustaining town centres, the employment within them and increasing the money flowing around the local economy. The impact from **SO2 (Climate Change)** was considered uncertain, but potentially positive as changing climates increase the awareness of the "cost" of travel to retail and businesses, so this will ultimately benefit towns and the local supply chain as people become more responsible with travel and their buying habits. A more vibrant local economy directly translates to better town centres, which means **SO3 (Economy & Enterprise)** offers positive support to the SA objective. A similar positive impact is predicted from **SO4 (Housing)**, as more people living and working in Calderdale will boost the town centre economies.

11.102 The value of excellent green infrastructure to a populations well being and health is likely to encourage businesses and people to setup and work in Calderdale, which has an impact ultimately on town centres (**SO5**). Heritage and history enhances town centres (**SO6**); a completely full Piece Hall full with independent shops and businesses will attract local people and tourists alike, not just for the retail but for the setting as well. As far as **SO7 (Transport)** is concerned, better links to town centres can only improve them and therefore this was seen

as having a positive impact. A better standard of living across the board will translate to better town centres, therefore a commitment to narrowing the gap (**SO8**) was seen as positive.

- 11.103** Whilst predicting a positive impact from the first **Spatial Option 1 (Focus on Eastern Calderdale)**, Elland and Halifax need to develop in terms of the existing provision of the town centres if they are to sustain vibrant town centres. The second Spatial Option, (**Enhancing the Role of Todmorden**) was also seen as having a positive impact, since although it was felt that Todmorden is a little isolated in Calderdale due to its transport links, enhancing its role through sustainable development will lead to a vibrant local economy. While a focus on Elland as proposed by **Spatial Option 3 (Enhancing the Role of Elland)** would lead to an improvement in the town centre, if the major developments in terms of business and employment provision is at Ainley top, there is the danger that Elland town centre would not see the benefit due to distance from the retail centre, therefore the impact on the SA objective was considered uncertain. If things are to stay as they are as proposed in **Spatial Option 4 (Current Role and Function)** an uncertain impact was predicted. As a result of such an approach, it is likely that there will be pockets of benefits as developments spring up in areas e.g. Sowerby Bridge Canal Basin, Elsie Whiteley centre, etc., but these are driven commercially rather than what is best for a town centre. The differences between Brighouse and Elland town centres are significant and unlikely to be redressed by keeping things as they are.
- 11.104** Either of the Sustainable Development Policy Options (**PO1**) would have a positive impact, as this is key to keeping the towns and their centres unique in Calderdale and able to sustain the employment, retail and business around the town centres. Better access to facilities, employment and town centres will have a positive effect on the numbers of people using sustainable transport (**PO2**). If more people that live in Calderdale can also work in the district the economy of Calderdale will get bigger which will inherently improve the town centres. Whilst it is the operation phase of businesses and retail in new developments that has the biggest impact on emissions, an active energy efficiency policy (**PO3**) in new developments will reduce ongoing energy costs of business and retail premises, which will ultimately make it easier for businesses in town centres. Any impact from the urban design policy (**PO6**) was predicted to be negligible on the SA objective, however the impacts there could be were predicted to be positive for town centres.
- 11.105** A positive impact was predicted through the provision of sufficient, accessible employment land and premises to meet the current and future needs of businesses (**PO8**); this was seen as the key to the future of all town centre development. The more people that can both live and work in the same town then the better for the local economy, and the better the opportunities for improving town centres and the likelihood of sustaining a vibrant, varied and viable town centre. Similarly, encouraging innovation and diversification in businesses (**PO9**) was viewed as a key point in the plan, and the specific key part being the flexibility to allow a wide range of employment generating uses. Also links from the development sites to the nearest town centres need to be established early to allow the centres to benefit from the increased potential footfall. Support for the Piece Hall and independent retailers were viewed as supporting this SA objective. The Piece Hall is key to the development of Halifax becoming a more major retail centre (**PO11**), as is the support of independent retailers to keep the town distinctive rather than cloned, and to improve the local economy to sustain retailers, the local supply chain and employment in the town centre areas.
- 11.106** In terms of other town centre uses, there was uncertainty over the impact of **PO12**. There are a number of town centre properties which are currently unusable for retail due to being purchased as living accommodation, or the landlord has no intention of filling them. When too much non-retail is viewed on the high street this can impact on the vibrancy and the opinion that people have of the town centre. There is room for cultural, leisure and recreation uses within the town centre but the prime function of a town centre should be to provide retail options for the people that live in the town and to generate enough revenue to sustain the

jobs, local economy, and societal needs of the town. If the contribution to the local economy drops due to the change of use of properties in town centres then the quality of the town centre will drop over time. Another vital policy in sustaining vibrant town centres (**PO13**) was also viewed as being supportive of the SA objective. The provision of free parking and opening hours are perhaps the biggest differentiator of people using their town centres versus out of town developments and supermarkets. These need to be addressed to create great town centres.

11.107 By definition a thriving town, local economy and healthy local supply chain will be more of a low carbon economy, and therefore **PO15** would have a positive impact. Policies that have regard to the economic, social and environmental benefits of green infrastructure (**PO24**) are expressing very long term sustainable goals which will cost in the short term but mean that the town can remain competitive through the next very changeable 50 years. Positive impacts were predicted through historic environment and design policies (**PO26,27, & 28**). For example, heritage adds value to town centres and good design has a measurable impact on them.

11.108 The easier it is to reach and use town centres the better for this SA objective, therefore if the plan ensures that places are properly connected (**PO30**) it will have a positive impact. Increasing modal shift away from the private car (**PO31**) was considered to have a potential negative impact on this SA objective. The biggest pull of out of town retail is free parking and plenty of it. People spending in out of town areas takes money out of the local economy which makes the centres more difficult to sustain. Park and ride, walking and cycling are in theory all very well, however they are not always practical for shopping trips or parents with children. If reducing the need to travel (**PO32**) encourages people to use town centres then there will be a positive impact on the SA objective. An additional positive impact was predicted from **PO33**, in working to ensure that differences in health, quality of life and economic prosperity reduce in Calderdale.

Table 11.16 Summary of impacts on SA 18: Enhance the viability and vitality of the town centres

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Sustainable Development enhancing and sustaining town centres (SO1); A more vibrant local economy (SO3); Increase in people living and working in Calderdale (SO4); Value of green infrastructure to health and well being and making a place more attractive (SO5); Heritage and History attracts people to town centres (SO6); Improved links to the town centres (SO7); Improving living standards (SO8);	Impact from Climate Change Objectives uncertain, although potentially positive in long term (SO2);	
Core Strategy Spatial Options		
Positive +	Uncertain ?	Negative X
Elland and Halifax need to develop (Spatial Option 1); Enhancing Todmorden's role (Spatial Option 2);	In terms of enhancing Elland's role, impact is uncertain dependent on where	

	development takes place (Spatial Option 3); Differences in town centres unlikely to be redressed through Spatial Option 4;	
Core Strategy Policy Options		
Positive +	Uncertain ?	Negative X
<p>Keeping town centres unique and sustainable (PO1);</p> <p>Need better access to facilities and opportunities (PO2);</p> <p>Long term benefits from energy efficient development (PO3);</p> <p>Limited positive impact from urban design adapting to climate change (PO6);</p> <p>Provision of sufficient accessible employment land (PO8);</p> <p>Encouraging business innovation and diversification (PO9);</p> <p>Flexible approach to employment allocations (PO9);</p> <p>Protecting and enhancing the Piece Hall (PO11);</p> <p>Improving accessibility to town centres (PO13);</p> <p>Low carbon economies support local town centres (PO15);</p> <p>Long term benefits of Green Infrastructure (PO24);</p> <p>Positive impact on town centres through protection and enhancement of the historic environment (PO26,27,&28);</p> <p>Ensuring places are properly connected (PO30);</p> <p>Working to reduce the need to travel (PO32);</p> <p>Working to reduce the differences in health, quality of life and economic prosperity (PO33).</p>	<p>Other town centre uses can impact on the quality of the town centres (PO12);</p>	<p>The biggest pull of out of town retail is free parking and lots of it. Difficult to increase numbers of people using sustainable transport when visiting town centres (PO31);</p>

11.1 Themes from Refined Issues and Options Appraisal

11.109 The following section summarises the key themes to emerge from the SA of the Core Strategy Refined Issues and Options.

The Key Issues are set out below:

Issue 1

Common Themes

Strategic Nature of the Core Strategy document results in uncertain impacts on the SA Objectives;
 Impacts dependent on the approach chosen - too many variables to predict impacts at present;
 Policies need to be co-ordinated;
 Policies should avoid negative impacts from development, losses should be compensated;
 National level policies will be a major factor.

Issue 2

Spatial Options

General Comments

North Halifax Urban Village should be explored;
 Impacts the same for Halifax and Brighouse if Option 1 or 2 is chosen;
 Potential to reduce greenhouse gas emissions depends on public transport, vehicle types, and standards of construction

Spatial Option 1

Positive for social inclusion but not for Todmorden;
 Development needed in terms of Halifax and Elland town centres;
 Improves accessibility for eastern Calderdale but not for the Upper and Ryburn Valleys;
 Has the potential to increase traffic volumes in eastern Calderdale especially in areas with no rail provision;
 Places further pressure on biodiversity in an area already suffering biodiversity decline compared to elsewhere in the district;
 Increased recreational pressure on the SPA/SAC

Spatial Option 2

Greater distribution of development would improve accessibility for people across the district;
 Positive impact on Todmorden town centre;
 Would likely to result in an increase in traffic in Todmorden but also increase public transport use;
 Increased pressure on biodiversity in areas adjacent to watercourses in Todmorden, the SPA/SAC, and Todmorden Moor

Spatial Option 3

Improves accessibility for eastern Calderdale but not for the Upper and Ryburn Valleys;
Potential increased traffic in the Elland area, but re-introducing a station and requiring public transport improvements, along with improving walking and cycling infrastructure would be a positive impact;
Impact on Elland Town centre dependent on where development takes place;
Increased recreational pressure on the SPA/SAC

Spatial Option 4

Considered to represent most positive outcome for social inclusion and health;
Unlikely to result in better accessibility for rural areas;
Unlikely to redress differences in town centres;
Traffic impacts would depend on each development;
Negative biodiversity impacts would be easier to avoid

Issue 3

Policy Options & Objectives

Improvements to deprived areas would improve social inclusion and health;
A Sustainable transport network would impact positively on climate change, social inclusion and health;
Transport Services and Facilities need to accommodate changes in travel modes;
Protection and enhancement of Green Infrastructure and Biodiversity would secure variety of benefits;
Impacts of increased use of Green Infrastructure needs to be considered;
Long term benefits of Green Infrastructure need to be recognised;
Policies should consider how biodiversity gain can be secured through development;
Mixed use developments increase accessibility;
Improving accessibility to town centres;
Sustainable development locations enhance accessibility;
Flood Risk has a number of negative impacts;
Uncertain impact from increased economic activity;
Low Carbon Economy could increase sustainable transport and support town centres;
Improvements to the urban realm could reduce impact of traffic;
Environments rich in Biodiversity are likely to be valued more in a thriving economy;
Brownfield land may have biodiversity value;
Sustainable development and climate change policies protect and enhance biodiversity;
Policies on wind turbines need to consider how to minimise adverse impacts;
Sustainable construction impacts on the levels of built environment emissions and energy use;
Policies should consider local biomass fuel sources;
Policies on the economy will have limited impacts in the short term;
Difficult to see how planning could increase employment for disadvantaged groups;
Short term commuting likely to continue;
Environmental factors and rising fuel costs may reduce commuting levels;
Sustainable economic growth relies on non planning factors;

Knowledge based economy not as reliant on land supply;
Anticipated that Calderdale will be able to adapt to economic challenges in the long term;
Inward investment likely to be reduced in the short term;
Location could be a long term advantage;
Protecting and enhancing historic environment will have a positive impact on town centres;
Non retail uses can impact on the quality of the town centre;
Town centres suffer from the free parking available at out of town retail parks

11.110 The above shows that despite the strategic nature of the Core Strategy Objectives, Spatial and Policy Options, a number of potential impacts have emerged. These will be used to inform the development of the Core Strategy Preferred Options, following which a subsequent appraisal has taken place and this is reported on in Section 10.

12 Stage C: Sustainability Appraisal of the Core Strategy Preferred Options

- 12.1** This next stage of the SA documents the assessment of impacts predicted to arise from the preferred options policies. Following the SA of the Core Strategy Refined Issues and Options (RI&O), the SA informed the development of the preferred options policies. Again, as in the appraisal of the RI&O, officers from the SA working group contributed to the assessment of the preferred options document, specifically the following elements:

Strategic Objectives (SO);
Core policies, including the Spatial Option (CP);
Thematic policies (TP); and
Area based policies.

- 12.2** As in the SA of the RI&O, the strategic nature of the Core Strategy means there are a number of instances where it is suggested the preferred option would not have an impact on the SA Objectives; the following section reports on the predicted impacts on each SA objective separately; a summary of the main themes arising from the SA is provided in the next chapter. Some comments were expressed against the overall plan rather than a single policy, but where possible, these have been assigned to the relevant policies. Each section is summarised in a table, setting out the potential positive, uncertain or negative impacts.

Impact on SA Objectives

Impact on SA 1 "To ensure quality housing is available to everyone".

- 12.3** The sustainable development objective **(SO1)** is predicted to have a positive impact on the SA objective, as delivering the identified housing need will contribute to reducing homelessness, increasing the range and affordability of housing for all social groups, improve people's opportunities to access good quality and affordable housing, and reduce the number of unfit homes, all of which underly the SA housing objective. The climate change objective **(SO2)** reinforces the importance of ensuring buildings are energy efficient, whilst adapting to the impacts should reduce the risk of flooding. The positive impacts from the climate change element of the plan are predicted to be felt over the medium to long term, as both planning policy and building regulations gradually increase the energy efficiency requirements for new residential development. In terms of the economy and enterprise objective **(SO3)**, more employment opportunities could increase people's ability to either buy or rent housing; again with the current economic conditions this is likely to take place over the medium to long term. There is a strong, positive relationship between the core strategy objective on housing **(SO4)** and the SA objective. If the outcomes expressed in the housing objective are met then the SA objective would be achieved.
- 12.4** The assessment of the green infrastructure and the natural environment objective **(SO5)** reported that there would be a limited impact, although there could be a positive link between the quality of housing and the provision of open spaces and links to the countryside; however it was considered to be a mainly uncertain impact until site locations and designs are fully known. Reinforcing the local character through historic environment and design **(SO6)** implies that housing will be well designed and therefore have a positive impact, although there is little impact on the underlying aims of the SA objective. In terms of the transport objective **(SO7)**, there was little if any impact predicted, although minimising adverse impacts could be argued to improve the quality of housing, or at least residents amenity. The communities and narrowing the gap objective **(SO8)** aims to reduce the differences in health, quality of life and economic prosperity in the borough, and therefore it is assumed that a positive impact on the SA objective would result; again this is likely to be over the medium to long term. The use of local materials **(SO9)** should add to the distinctive character of the housing stock, and could be argued to

ensure that new housing is of sufficient quality; additionally the expressed aim to minimise the environmental and social impacts could also protect residents amenity, although the extent of the impacts will depend on the nature of individual sites and therefore the overall assessment is uncertain.

- 12.5** In terms of the core policies, the spatial option policy (**CP1**) is considered to support the SA objective, as it seeks to ensure that the levels of identified housing needs during the lifetime of the plan are distributed in the most appropriate places throughout the district. It therefore has the potential to reduce homelessness, as well as improving people's opportunity to access good quality and affordable housing. Likewise, the provision of housing (**CP4**) results in strong positive support for the SA objective, by providing appropriate accommodation for all households wanting homes. The same assessment was recorded against the sustainable development core policies (**CP5 and CP6**) as the related strategic objective (SO1), as development of this type implies that the needs of the present generation (including housing) are met, although this must be done without having a negative impact on the ability of future generations to meet theirs. In addition, **CP6** specifically refers to ensuring proposals support the identified local needs (which includes housing) of Calderdale's communities.
- 12.6** Sustainable design and construction and increasing levels of renewable and low carbon energy generation are just two aspects of the climate change policy (**CP7**) that will make a positive contribution to this SA objective, as both aspects can help improve the energy efficiency of housing, which in turn should help reduce levels of fuel poverty and therefore help increase the affordability of housing.
- 12.7** There was an uncertain impact from the locations for sustainable growth policy (**CP8**); actual impacts were predicted to be easier to assess once site details were known. In making a commitment to carry out a green belt review (**CP9**) in order that the necessary housing can be delivered there would be a positive impact, as was also predicted to be the case with the limited infilling of villages and affordable housing that met community needs in the rural areas (**CP10**). If development meets the criteria set out in the high quality, inclusive design policy (**CP12**) there would be a positive impact. The sustainable design and construction policy (**CP13**) is recorded as having a positive effect on the SA objective through various measures, such as improving the energy efficiency of development, reducing fuel poverty levels, as well as highlighting the importance of spaces between buildings, which can further enhance the quality of housing by preforming both an open space role as well as a temporary flood risk one. Finally, in terms of the core policies (**CP14**), the quality of housing and people's experience of it is linked to the provision of sufficient infrastructure, therefore an impact on the SA objective is expected but it will be dependent on the nature of development.
- 12.8** There was a limited impact recorded against the policy on hot food take aways (**TPE8**), although a positive impact could be achieved in terms of reducing the negative impact on residents amenity that can arise from such businesses. Appropriate parking provision in new developments (**TPT3**) will add to the overall quality of housing and therefore supports the SA objective, whilst ensuring a local supply of building materials (**TPM1**) can reinforce the local character of the area and maintain it as an attractive place to live, although it would not have a direct impact on people's ability to access housing. Ensuring adequate waste storage and segregation areas are included in the design of housing developments will add to the quality of the housing and residents amenity and therefore policy TPW1 is supportive of the SA objective, similarly in requiring proposals for new or extended waste management facilities to avoid unacceptable impacts on people or the environment a positive impact was recorded against **TPW3**.
- 12.9** The policy that determines how land will be allocated for housing (**TPH1**) fully supports the SA objective by providing a framework to ensure sufficient sites are allocated to meet the districts housing needs, the assessment also noted a positive impact as a result of the role that non allocated sites (**TPH2**) can play in contributing to future housing needs. Consideration

of a range of appropriate densities (**TPH3**) would be likely to have a positive impact as this would help ensure residents amenity is protected. If the policy concerned with high quality housing (**TPH4**) secures the intended outcomes such as sustainable designs and construction methods, space standards, and energy efficiency measures there would be a positive impact, since a major impact on the SA objective is the cost of heating and lighting; therefore by reducing these costs should help increase the affordability of housing. The mix of housing types and sizes (**TPH5**) includes a number of positive measures, such as the requirements for developments of 12 or more dwellings to include a mix of housing in types of size and type, requirements for a certain proportion of lifetime homes, as well as increasing the amount of housing suitable for the elderly. By delivering a certain proportion of affordable housing, policy **TPH6** is recorded as having a positive impact on the SA objective, as it is intended to increase the range and affordability of housing. The proposed policy requires a higher level of affordable housing than either the original RCUDP policy or its replacement by national policy, and attempts to secure the benefits of affordable housing for future owners and occupiers. By identifying sufficient sites and pitches for the gypsy and traveller and travelling showpeople communities, policy **TPH7** is also considered to have a positive impact.

- 12.10** Ensuring that new development is directed away from flood risk zones 2 and 3 (**TPF1**) was predicted to help support the SA objective, and, whilst although part of the quality of housing is its setting, there were limited (if any) impacts considered as a result from all the green infrastructure and natural environment policies (**TPNE1, TPNE2, TPNE3 and TPNE4**). In ensuring that pollution is controlled (**TPEP1**), there would be a positive impact on residents amenity, which was also the assessment against the policy concerned with environmental protection (**TPEP2**). On site renewable and low carbon energy generation (**TPRE1**) could help reduce fuel costs and therefore increase affordability of housing, although the overall impact was recorded as being uncertain as other policies in the Core Strategy will have a greater impact.
- 12.11** By identifying the housing requirements for Halifax the area based policy (**HX1**) has a positive impact. Similarly, by identifying land and sites for housing types and tenures the north Halifax policy (**HX3**) will make a positive contribution on the SA objective. The remainder of all the other area based policies (apart from the Moors area) are also considered to have a positive impact by the virtue of identifying the housing requirements for the relevant area.

Table 12.1 Summary of impacts on SA1: To ensure quality housing is available to everyone

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Delivering the identified housing need (SO1); Energy efficient development(SO2); Reducing the risk of flooding (SO2); Increasing employment and incomes (SO3); Meeting the housing needs (SO4); Delivering a mix of housing types (SO4); Sustainable building methods (SO4); Provision of open spaces (SO5); Quality of design (SO6); Reducing differences in health and well being (SO8); Use of local materials (SO9)	Protection and enhancement of green infrastructure and natural environment (SO5) Extent of social and environmental impact dependent on site locations (SO9);	

Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
<p>Delivery of identified housing requirements distributed appropriately through the district (CP1);</p> <p>Provision of housing (CP4);</p> <p>Sustainable development of housing (CP5, CP6);</p> <p>Support development that meets local needs (CP6);</p> <p>Energy efficient development (CP7, CP13);</p> <p>Review of the green belt (CP9);</p> <p>Limited infilling of villages (CP10);</p> <p>Affordable housing that meets rural communities needs (CP10);</p> <p>High quality, inclusive design (CP12);</p> <p>Importance of spaces between buildings (CP13)</p>	<p>Locations for growth (CP8);</p> <p>Nature of infrastructure delivered (CP14);</p>	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
<p>Appropriate levels of parking (TPT3);</p> <p>Local building materials reinforcing local character and quality (TPM1);</p> <p>Including waste storage areas in housing developments (TPW1);</p> <p>Avoiding unacceptable impacts on residents from new or extended waste facilities (TPW3);</p> <p>Allocating sufficient land for housing (TPH1);</p> <p>Role of non allocated sites in contributing to housing needs (TPH2);</p> <p>Appropriate densities (TPH3);</p> <p>Sustainable construction and design (TPH4);</p> <p>Securing development that meets space standards (TPH4);</p> <p>Energy Efficient development (TPH4);</p> <p>Mix of housing types and sizes (TPH5);</p> <p>Development of lifetime homes (TPH5);</p> <p>Development of housing for the elderly (TPH5);</p> <p>Increased proportion of affordable housing requirements (TPH6);</p> <p>Identifying sufficient sites and pitches for the gypsy and traveller community (TPH7);</p> <p>Directing development away from flood risk zones 2 and 3 (TPF1);</p> <p>Ensuring pollution is controlled (TPEP1, TPEP2);</p> <p>On site generation of renewable energy could help reduce fuel costs (TPRE1);</p>	<p>Impacts resulting from Hot Food Takeaways (TPE8);</p> <p>Impacts from ensuring local supply of building materials (TPM1);</p> <p>Impacts from green infrastructure and natural environment policies (TPNE1, TPNE2, TPNE3 and TPNE4);</p>	

Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
Identifying the housing requirements for each area.		

Impact on SA2 "To improve safety and security for people and property"

- 12.12** The number of policies considered to have an impact on this SA objective were smaller than was the case against other SA objectives, and the majority of comments related to the design aspect. In terms of the strategic objectives, as one of the guiding principles of sustainable development is considered to be ensuring a strong, healthy and just society, which includes safety and security, there would be a positive impact resulting from **SO1**. In terms of climate change (**SO2**), part of adapting to and mitigating the impacts of climate change are to ensure that developments are designed to reduce peoples exposure to flood risk and higher temperatures, therefore it was recorded as having a positive impact, though this was likely to be over the medium to longer term.
- 12.13** In referring to high quality inclusive design another positive impact would result from (**SO6**), as this implies that safety would be taken into account. Similarly, the transport objective (**SO7**) would, in delivering a safe and efficient transport system (for example reducing the number of road casualties) make a positive contribution to the objective.
- 12.14** In terms of the core policies, both sustainable development policies (**CP5 and CP6**), like the related strategic objective, were reported to have positive impacts, given their guiding principles, as was the case with the assessment of the climate change core policy (**CP7**). Reference to how a development functions (**CP12**) was considered to result in positive impacts, since the design will, amongst other things, be required to consider safety issues, including land instability as well as 'secured by design' approaches that promote community safety and crime prevention measures. Although the main impacts resulting from the sustainable design and construction policy (**CP13**) were suggested to be uncertain, there could be a positive impact as a result of protecting and enhancing open and green spaces, as these could help reduce both the incidences and perceived levels of crime. The impact on the SA objective from the infrastructure provision (**CP14**) policy was suggested as being uncertain, as the actual impact would be dependent on the nature of the infrastructure provided and whether or not this impacted on safety and security was not clear at this time.
- 12.15** An uncertain impact was recorded against the town centre retail hierarchy policy (**TPE4**), but protecting and enhancing town centres could have a positive impact by increasing footfall rates and as a result the levels of natural surveillance. A positive impact was assumed as a result of the general town centre principles (**TPE6**), as the policy takes account of not only enhancing the amenity value of the area, but primarily by taking account of the safety and security of all potential visitors and users. Creating a diverse range of facilities in the town centre could increase the number of people around at different times of the day. In making sure places are properly connected (**TPT1**), one of the investment criteria is to secure a reduction in road casualties, and therefore supports the SA objective.
- 12.16** Addressing the needs of gypsies and travellers and travelling showpeople (**TPH7**) was recorded as having a positive impact, as identifying the needs and allocating sufficient sites that are not within areas of high flood risk supports the SA objective. Similarly, in allocating sites the need to take planning enforcement action will be reduced. Remaining with flooding, the relevant policy (**TPF1**) was also seen as having a positive impact, by avoiding development in high risk flood zones. By ensuring a reduction in the amount of development exposed to

pollution, there is a positive impact predicted from **TPEP1**.

- 12.17** The only comment recorded against the area based policies was attributed to the Halifax town centre (**HX2**) policy. Maintaining a safe and strong evening and night time economy in line with the town's 'Purple Flag Award' status will have a positive impact on the SA objective, and should assist in reducing the fear of crime and possibly reducing crime as the town centre would no longer be perceived to be dominated by binge drinkers.

Table 12.2 Summary of impacts on SA 2: To improve safety and security for people and property.

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Strong, healthy and just society (SO1); Reducing people's exposure to flood risk and higher temperatures (SO2); Securing high quality, inclusive design (SO6); Delivery of a safe, efficient transport system (SO7)		
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Guiding principles of sustainable development (CP5, CP6); Reducing people's exposure to the negative impacts from climate change (CP7); Taking account of safety and security as part of the design of development (CP12); Protection of open spaces (CP13);	Sustainable design and construction (CP13); Impact dependent on the nature of infrastructure delivered (CP14);	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Enhancing the amenity of the town centres (TPE6); Considering the safety and security of visitors to the town centres (TPE6); Diverse range of town centre uses (TPE6); Reducing road casualties (TPT1); Diverting development away from high risk flood zones (TPH7, TPF1); Reducing exposure to pollution (TPEP1)		
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
Maintaining and enhancing a safe and strong evening and night time economy (HX2)		

Impact on SA3 "To create and retain vibrant communities that promote good health and social inclusion"

- 12.18** The impact on this objective has been considered to be largely positive. All of the Strategic Objectives are predicted to have a positive impact, especially **SO1** and its emphasis on sustainable development which means a promotion of sustainable travel such as walking and cycling, both of which will improve the population's health as well as improving people's access to opportunities. **SO4 (Housing)** and the reference to brownfield land is also predicted to have a positive influence on accessibility and social inclusion. Green Infrastructure (**SO5**) can provide attractive walking and cycling routes, as can the principles expressed in **SO7** (Transport). In relation to communities and improving health and prosperity, (**SO8**), if the development that is delivered supports the strategic objective then again a positive impact would result. There were no specific impacts predicted from either of the minerals and waste objectives.
- 12.19** Overall, it was considered there would be positive impacts arising from the Core Policies. The spatial option policy (**CP1**) was supported especially with Elland as a focus for employment development, given Elland's location, its growth potential and its rising unemployment rate. In that context, re-opening of Elland train station and further development of walking and cycling links to the station and transport links with Halifax town centre would be priority developments. In terms of **CP4** and housing, could there be a greater brownfield land target, which would take pressure of greenfield sites and improve accessibility. However, brownfield sites are not always more accessible than greenfield sites. **CP5** and **CP6** (Sustainable Development), are both predicted to have a positive impact as per the related strategic objective. The climate change policy (**CP7**) includes a requirement to locate development in locations that are accessible by sustainable travel modes, as does the sustainable locations policy (**CP8**). Putting sustainable forms of transport above other motor vehicles (**CP12**) will have a positive effect, providing that they are realistic alternatives and 'trip end' facilities are provided (such as showers, lockers etc). Energy efficient homes delivered through sustainable construction methods (**CP13**) will help reduce fuel poverty levels.
- 12.20** In relation to the Thematic Policies, supporting proposals within regeneration areas that are easily accessible by public transport, walking or cycling from areas of high unemployment (**TPE1**) will have a positive impact on the social inclusion aspect of the objective. New development in town centres (**TPE6**) that seek to increase physical activity where possible and contribute to a positive health impact would also result in a positive impact. A new type of policy on Hot Food Takeaways is included (**TPE8**), born out partly from comments from the SA of the RI&O and the original drafting of policies in the preferred options. The policy is intended to reflect a more proactive approach by the Council to the saturation of takeaways, ice cream vans, and burger vans near schools, as a restriction on these could result in health and obesity benefits.
- 12.21** Making sure places are properly connected (**TPT1**) supports the SA objective in both health and social inclusion aspects, promoting walking, cycling, public transport, as does **TPT2** and its emphasis on sustainable travel. Improving walking and cycling routes will lead to an improvements in people's health, and improving public transport could improve social inclusion through increased access to job and leisure opportunities. The accessibility requirements expressed in **TPT3** should make a positive contribution to the SA objective, requiring development to be located within certain distances of a bus route and a local centre or above, as will the priority given to pedestrians, cyclists and public transport passengers.
- 12.22** Working with partners to improve the well-being of the population and reducing levels of social deprivation by supporting the development and retention of community services and facilities within areas of identified need or deprivation will make a positive contribution (**TPC1**). In relation to the impact of the housing policies on the SA objective, the assessment of **TPH1** repeats the positive impact predicted as a result of the strategic objective; focusing on

brownfield land first is likely to improve accessibility to existing facilities, and although the level of brownfield land identified is suggested to be a little low, this is largely as a result of the land that is available. Preventing sites that are used for active sports or recreation (**TPH2**) being developed as a non allocated site supports the SA objective, delivering high quality housing (**TPH4**) will reduce fuel poverty and therefore support the health aspect of the SA objective, whilst a mix of house types (**TPH5**) and affordable housing policy (**TPH6**) will help promote social inclusion.

- 12.23** In terms of protecting people's health, the flood risk (**TPF1**) policy should have a positive impact, as will defining a green infrastructure network hierarchy (**TPNE1**). Identifying a functional role for green infrastructure (**TPNE2**) along with a joined up network (**TPNE4**) will help make cycling and walking more attractive. Finally, in terms of relevant thematic policies an outcome of controlling pollution (**TPEP1**) and environmental protection (**TPEP2**), should be a positive impact on people's and the environment's health.
- 12.24** No specific comment was made in relation to this objective and the area based policies, although comments that were made in relation to the spatial option concerning Elland will apply to policies **E1** and **E2**.

Table 12.3 Summary of Impacts on SA3: To create and retain vibrant communities that promote good health and social inclusion

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Promoting sustainable travel, e.g. walking, cycling (SO1, SO5, SO7); Developing brownfield sites improving access and social inclusion (SO4); Development that reduces inequalities in health and well being (SO8);		
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Spatial option policy will help reduce unemployment, especially in Elland (CP1); Development of Elland rail station (CP1); Further development of walking and cycling links (CP1); Promoting sustainable travel, e.g. walking, cycling (CP5, CP6); Locating development that is accessible by sustainable travel modes (CP7, CP8); Prioritising sustainable travel modes (CP12); Energy efficient homes (CP13);	Brownfield target (CP4);	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Supporting development easily accessible by sustainable travel modes, including areas of high unemployment (TPE1);	Brownfield target (CP4);	

<p>Town centre development that seeks to increase accessibility by walking and cycling (TPE6);</p> <p>Restricting Hot Food Takeaway locations (TPE8);</p> <p>Promoting sustainable travel (TPT1, TPT2, TPT3);</p> <p>Locating development within access of a bus route and a local centre (TPT3);</p> <p>Support for the retention an development of community service and facilities (TPC1);</p> <p>Prioritising brownfield land and reuse of existing buildings (TPH1);</p> <p>Protecting sports and recreation grounds (TPH2);</p> <p>Reducing fuel poverty (TPH4);</p> <p>Delivering a mix of housing types (TPH6);</p> <p>Diverting development away from areas at a high risk of flooding (TPF1);</p> <p>Links between cycling, walking, and green infrastructure (TPNE1, TPNE2, TPNE4);</p> <p>Protecting people from pollution (TPEP1);</p> <p>Protecting the environment (TPEP2);</p>		
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
Identifying employment and housing development needs		

Impact on SA 4 "To ensure that cultural, leisure, and recreation activities are available to all"

- 12.25** A healthy, strong and just society is implied through the sustainable development strategic objective **(SO1)**, and therefore this will provide a positive contribution to the SA objective. Similarly, achieving a resilient, sustainable economy **(SO3)** would also make a positive contribution, as increasing the numbers of people employed and therefore with a regular income could increase the numbers of people accessing cultural, leisure and recreation activities. The housing objective **(SO4)** was considered to have an uncertain impact, as it would be largely dependent on the location and design of development. By protecting Calderdale's natural environment and green infrastructure **(SO5)**, a positive impact on the SA objective could be secured, and protecting and enhancing the historic environment **(SO6)** adds to the culture of the borough, and was therefore considered to make a positive contribution.
- 12.26** A safe, efficient transport system as intended by **SO7** was predicted to make a positive contribution, although there was uncertainty expressed concerning the cost of travel. Achieving the objective of improving people's quality of life **(SO8)**, would have a positive impact, whilst a potential positive outcome resulting from the restoration of mineral sites **(SO9)** was also identified.
- 12.27** The spatial option policy **(CP1)** was considered to have an uncertain impact overall. Focusing development in and around the main urban areas would help support existing cultural, leisure and recreational activities as this is where the majority of the population live. However this does not automatically mean that access will be increased for those in the greatest need, nor does it mean that access to and from the countryside will be improved. Through the provision of town centre floorspace and supporting existing centres **(CP3)**, there was support for the SA objective, while the impacts from the housing objective **(CP4)** were recorded as being

uncertain, as it would be dependent on the actual site allocations and associated services and facilities delivered as part of residential developments. In terms of both the sustainable development policies (**CP5 and CP6**), the assessment repeated the comments against the related strategic objective (SO1), in that sustainable development is underpinned by a strong, healthy and just society. The sequential approach as set out in the policy dealing with locations for sustainable growth (**CP8**) should have a positive impact, while the Green Belt policy (**CP9**) was suggested to have an uncertain impact overall, although it could make a positive contribution through considering the needs of rural communities, which was also the case with the Area Around Todmorden policy (**CP10**). In terms of infrastructure provision (**CP14**), the impact would be largely dependent on the specific nature of the development and infrastructure secured.

- 12.28** As was the case with other SA objectives, not all the thematic policies were considered to have an impact. Of those that were, the retail hierarchy (**TPE4**) was recorded as having a positive impact, by focusing retail development towards existing centres, which offer the greatest potential for ensuring accessibility for the majority of the population, although this could have an uncertain impact for rural communities. Similarly, the general town centre principles policy (**TPE6**) was considered to have a positive impact, as it aims to improve accessibility to and from town centres. An uncertain impact was suggested as a result of local retailing and service provision outside of centres (**TPE7**), although certain positives could be established if the policy delivered development that met a cultural, leisure, or recreational need for a local community. As would be expected, the policy addressing cultural provision (**TPE9**) is recorded as having a positive impact, seeking as it does to enhance local participation and cultural provision across the district.
- 12.29** In making sure places are properly connected (**TPT1**), there was assumed to be a positive impact on making activities available to people, however, availability will also be dependent on both the cost of travel and the activities themselves. In achieving sustainable travel (**TPT2**), enhancing the bridleways, footpaths, and cycle routes should help improve access to and from the countryside, although as is the case with TPT1, the extent of the impacts are dependent on the costs of the activities. In supporting the development and retention of community services and facilities within areas of identified need or deprivation (**TPC1**) there should be a positive impact on the SA objective.
- 12.30** The impacts from the allocation of land for housing (**TPH1**) are uncertain, as it will be down to individual site locations and layouts, which is also the assessment recorded against **TPH2** and non allocated housing sites. However, in the case of non allocated sites, the policy criteria does indicate a protection for active sport and recreation sites, which would have a positive impact. Defining a hierarchy of green infrastructure (**TPNE1**) will have a positive impact as it refers to the need to focus on improving green infrastructure in specific areas with the greatest needs and opportunities. By protecting and maintaining green infrastructure (**TPNE2, TPNE3**) a positive impact would result if it contributes to meeting local needs, whilst a joined up green infrastructure network (**TPNE4**) is suggested as having a positive impact as it aims to extend access and informal recreational opportunities. By protecting and enhancing Calderdale's historic environment, policy **TPHE1** is recorded as having a positive impact, as it would ensure this aspect of local culture remained part of peoples lives.
- 12.31** Not all area based policies are predicted to have impacts, although the Halifax town centre (**HX2**) policy is suggested to have a positive impact, since it focuses on the enhancement of the vitality and viability town centre, including the leisure and cultural quarters. The north Halifax policy (**HX3**) aims to deliver development that has easy access to open spaces and that provides the full range of supporting uses, including community facilities. In addition, the policy aims to improve connections across the north Halifax area, to and from the town centre and beyond. The Northowram and Shelf area policy (**NS1**) could potentially have a positive impact, as part of the policy seeks to protect and enhance local green spaces and improving

the access to the countryside. Finally, the Moors area policy (**MRS1**) was assessed as having an uncertain impact, although the reference to 'managed tourism' being encouraged through the development of facilities and services in adjacent areas could imply support for the SA objective.

Table 12.4 Summary of impacts on SA4: To ensure that cultural, leisure and recreation activities are available to all

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Sustainably developed facilities (SO1); Increasing employment opportunities and resulting incomes (SO3); Protecting the natural environment and green infrastructure (SO5); Protection and enhancing the historic environment (SO6); Delivery of a safe efficient transport system (SO7); Improving people's quality of life (SO8); Restoration of former mineral sites (SO9)	Dependent on location and design of development (SO4); Cost of travel (SO7)	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Focusing development in and around main urban areas (CP1); Provision of town centre floorspace and support for existing centres (CP3); Sustainable developed facilities (CP5, CP6); Sequential approach for sustainable locations (CP8); Considering the needs of rural communities	Does not guarantee access for those in greatest need (CP1); Uncertain whether access to and from the countryside will be improved (CP1); Impacts dependent on site allocations (CP4); Depends largely on the types of services and facilities delivered as part of residential developments (CP4); Overall impact of green belt and area around Todmorden policy uncertain (CP9, CP10); Impact dependent on the type of infrastructure secured (CP14)	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Focusing retail development in existing centres (TPE4);	Rural communities access to retail (TPE4);	

<p>Improving accessibility to and from the town centres (TPE6);</p> <p>Delivering local retailing and service provision (TPE7);</p> <p>Enhancing local participation and cultural provision (TPE9);</p> <p>Improving connections between places (TPT1);</p> <p>Enhancing the bridleways, footpaths and cycle routes improve access to and from towns and countryside (TPT2);</p> <p>Development and retention of community facilities and services (TPC1);</p> <p>Protect active sport and recreation sites (TPH2);</p> <p>Improving green infrastructure in areas of specific need and opportunity (TPNE1);</p> <p>Protecting and enhancing green infrastructure (TPNE2, TPNE3);</p> <p>Extending access and informal recreation opportunities (TPNE4);</p> <p>Local historic environment (TPHE1)</p>	<p>Accessibility also dependent on non planning matters such as cost of travel and activities themselves (TPT1, TPT2);</p> <p>Impacts largely down to location and design of developments (TPH1, TPH2);</p>	
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
<p>Enhancing the vitality and viability of Halifax town centre (HX2);</p> <p>Provision of accessible open spaces and community facilities (HX3);</p> <p>Improving connections across north Halifax and beyond (HX3);</p> <p>Enhancing local green spaces and access to the countryside (NS1);</p>	<p>Moors area policy (MRS1)</p>	

Impact on SA5 "To improve accessibility to essential services, facilities and employment"

12.32 The comments on the predicted impacts on this SA objective were again largely positive, although a number were considered to be uncertain. Although the impacts of the sustainable development strategic objective (**SO1**) were considered to be positive, it was suggested the objective should take into account accessibility, in order to reduce the need for travel. In addressing the impacts of climate change (**SO2**), low carbon transport strategies and locating development in urban areas will both have a positive impact. A strong resilient local economy (**SO3**) will positively support the SA objective, as it is intended to ensure the availability of local employment which could also lead to a better range of local facilities. In prioritising housebuilding in sustainable locations, (**SO4**), it is assumed this will mean that residential development takes place in locations that reduce the need to travel by car especially, and have good access to existing services and facilities. An efficient transport system across the district (**SO5**) will improve accessibility to services, facilities, and employment for everyone, which in turn could lead to more demand and easily accessible services.

12.33 An uncertain impact was predicted concerning the impact of **SO8** on the SA objective, which is about communities and improving health and income. Although successfully achieving the

strategic objective would include improving accessibility, it was considered the objective cannot be said to be shown to explicitly support the SA objective. There was also a positive impact predicted as a result from the waste strategic objective (**SO10**), as provision of waste management facilities in sustainable locations will ensure accessibility to these services.

12

- 12.34** Concerning the core policies, the spatial option (**CP1**) was considered to have an uncertain impact on the SA objective, although ensuring a distribution of essential services and facilities, including employment opportunities across the district should help people access these. However, focusing on Elland for employment will limit accessibility by rail, but the longer term outlook may be more positive as there is a reference to improving the Calder Valley rail line. In providing town centre retail floorspace (**CP3**), a positive impact is predicted as this should ensure good accessibility for the majority of Calderdale's population. In locating new retail development close to public transport hubs it should also help those in greatest need. Locating new residential development (**CP4**) on brownfield land will, in many cases mean the development is close to existing services and facilities, therefore supporting the SA objective.
- 12.35** Despite the fact that sustainable development aims expressed in **CP5** would imply improving access to services by delivering more development in the right places, it was suggested an alternative view could be taken, as allowing more development could restrict access, particularly to the natural environment. The other sustainable development policy (**CP6**) was, though, expected to deliver a wholly positive impact on the SA objective. In requiring development to support a reduction in travel demand (**CP7**) both the climate change and sustainable locations (**CP8**) core policies are predicted to make a positive impact, as is **CP12** which requires high quality inclusive design, and developers to consider access for all sectors of the community.
- 12.36** Both the Code for Sustainable Homes (CSH) and BREEAM assessments include accessibility as one of the elements development is tested against, therefore **CP13** should make a positive contribution to the SA objective. The final core policy deals with infrastructure provision and the Community Infrastructure Levy (**CP14**), and will be used in part to fund improvements to the strategic highway network, which will have a beneficial effect on improving accessibility.
- 12.37** The assessment of the impacts of the thematic policies against this SA objective was considered to be largely positive. Starting with the employment based policies, ensuring accessibility is taken into account when identifying employment land (**TPE1**) will make a positive contribution, as will diversifying the economy in areas that are within easy reach for people living in high areas of worklessness (**TPE3**). In terms of the retail policies, again there was a largely positive impact. The retail hierarchy (**TPE4**), through ensuring development in the urban centres should ensure good access for the majority of the population. Alongside this, the policy also gives priority to retail development in local and neighbourhood centres where there is the greatest need. Support for the SA objective is also evident in the general town centre principles, requiring development to improve accessibility to and from the town centres (**TPE6**). The policy concerned with local retailing and service provision outside of town centres (**TPE7**) contributes to the overall retail strategy of focusing development in the main town centres. The assessment of the cultural provision policy (**TPE9**) also recorded a positive impact on the SA objective.
- 12.38** All three transport policies were predicted to have positive impacts; as expected, the policy concerned with connecting places (**TPT1**) is predicted to improve accessibility by enhancing transport networks, while sustainable transport (**TPT2**) and focusing on encouraging alternatives to the private car will help reduce congestion and improve journey times, which in turn improves accessibility. Supporting alternatives to the car will improve accessibility for disadvantaged groups amongst whom car ownership is low. In relation to transport requirements for allocations and development proposals (**TPT3**), the policy explicitly addresses accessibility, ensuring good travel and transport links with existing urban centres.
- 12.39** In focusing the search for new waste facilities within the urban areas, this should ensure

accessibility to these facilities is maintained and enhanced (**TPW2**). In the community, health, and education policy (**TPC1**), the ways in which access to services and facilities will be optimised for those in greatest need is set out, which contributes positively to the SA objective.

- 12.40** Where impacts were predicted as a result of the housing policies, they were all deemed to be positive. In allocating land for housing (**TPH1**), the policy refers to a priority for the re-use of brownfield land and buildings, which is likely to result in locating development close to existing services and facilities. In limiting the use of non allocated sites for housing, accessibility to existing services will be maintained (**TPH2**), and in identifying residential densities (**TPH3**), the policy makes explicit reference to the availability of local services and facilities. In meeting the needs of Gypsies, Travellers, and Travelling Show people (**TPH7**), it is suggested that the policy will help ensure good access to facilities, services, and employment for travellers, as one of the criteria for designating sites includes the requirement for local services and facilities to be near to the site.
- 12.41** Defining a hierarchy of green infrastructure (**TPNE1**) will help ensure its accessibility in prioritising its development to meet both its current and future demand, and focusing in areas of greatest need. In identifying a functional role for green infrastructure (**TPNE2**), protection will be given to where it meets local needs and where it improves the experience of cyclists and walkers, which is also the case with the policy that addresses the joining up of a green infrastructure network (**TPNE4**). The remaining green infrastructure policy which deals with securing provision (**TPNE3**), will require new development to incorporate access to green infrastructure for quality of life, leisure and recreational purposes. The final thematic policy with a predicted impact on the SA objective is concerned with the historic environment (**TPHE1**), a positive impact is predicted as a result of ensuring access to Calderdale's historic environment for current and future generations.
- 12.42** The area based policies are also predicted to have a mainly positive impact. Of the Halifax area policies, **HX1** makes reference to improving transport networks to improve access, particularly by public transport, and to ensure that a range of local services is available to meet demand. The master plan policy (**HX3**) for North Halifax includes improvements to transport networks, and ensuring a range of services is available to meet demand. It is predicted that this will improve access to services for those with greatest needs, given the deprivation levels in parts of North Halifax.
- 12.43** Of the Brighouse area policies, policy **B1** is suggested to have a positive impact, principally by monitoring transport networks to ensure they keep pace with new development, and increasing services where significant new demand occurs. The Elland area policy **E1** will have a positive impact, especially with the support for the new rail station in the town, as well as confirming that local services will be enhanced to keep pace with demand. Of all the other area based policies, where there is a predicted impact it is considered positive as a result of the requirement for development to contribute to at least one of a set of improvements, many of which relate to accessibility.

Table 12.5 Summary of impacts on SA 5: To improve accessibility to essential services, facilities and employment

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Sustainable development principles (SO1); Low carbon transport strategies (SO2); Locating development in urban areas (SO2);	Sustainable development objective needs to specifically refer to	

Increased availability of local employment (SO3); Prioritising residential development in sustainable locations (SO4); An efficient transport system (SO5); Provision of waste facilities in sustainable locations (SO10);	accessibility (SO1); Objective concerning improved health and well being does not specifically refer to accessibility (SO8);	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Ensuring distribution of essential services and facilities (CP1); Longer term improvements to Caldervale rail line (CP1); Provision of town centre floorspace (CP3); Locating new retail close to public transport hubs (CP3); New residential development on brownfield land (CP4); Delivering more development in the right areas (CP5); Sustainable development will have a positive impact (CP6); Reducing travel demand (CP7, CP8); Design that considers access for all sectors of the community (CP12); Both the Code for Sustainable Homes and the BREEAM assessments include accessibility as a criteria (CP13); Improvements to the strategic highway network (CP14)	Impact uncertain, dependent on specific site locations and designs (CP1); Limited access to Elland by rail (CP1); Increased development could restrict access to the countryside (CP5);	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Ensuring accessibility is taken into account when identifying employment land (TPE1); Diversifying the economy in areas accessible for unemployed people (TPE3); Focusing retail development in the main urban centres (TPE4, TPE7); Priority for local and neighbourhood retail development in areas of greatest need (TPE4); Requiring development to improve access to and from town centres (TPE6); Enhancing local participation and cultural provision (TPE9); Improving transport networks (TPT1); Promoting sustainable travel and reducing the numbers of cars on the road (TPT2); Ensuring good travel and transport links with the existing urban centres (TPT3);		

Maintaining access to waste facilities (TPW2); Optimising the access to services for those in the greatest need (TPC1); Prioritising brownfield land (TPH1); Limiting use of non allocated sites for housing (TPH2); Densities to reflect availability of local services (TPH3); Assist with access, facilities and services for the gypsy and traveller community (TPH7); Defining a hierarchy of green infrastructure (TPNE1); Improving links for cyclists and pedestrians (TPNE2, TPNE4); Requiring development to incorporate access to green infrastructure (TPNE3); Ensuring access to the historic environment (TPHE1);		
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
Improving transport networks (HX1, HX3); Maintaining a range of local services to meet local demand (HX1); Improving access for those in the greatest need (HX3); Monitoring transport networks and impacts of new development(B1); Increasing services where new demand occurs(B1, E1); Support for a new rail station in Elland (E1); Inclusion of accessibility as a criteria for improvements (All other area based policies)		

Impact on SA6: To provide the education and training opportunities to build skills and capacities

- 12.44** Overall there were a limited number of impacts on the SA objective arising from the preferred options. In terms of the strategic objectives, there was felt to be a positive impact as a result a vibrant economy (**SO3**), as this would help to increase the percentage of the local population in employment. An uncertain impact was recorded against the housing objective (**SO4**), although better housing may encourage people to take up learning opportunities. Improved transport links (**SO7**) remove barriers for people to access education and training opportunities, as does improving people's health (**SO8**).
- 12.45** Concerning the core policies, the provision of employment floorspace (**CP2**) and town centre floorspace (**CP3**) will help support increase the numbers of local people in employment, while the assessment against the provision of housing policy (**CP4**) repeated the impact of the housing objective (SO4). A positive impact was predicted as a result of the infrastructure provision policy (**CP14**) as new educational facilities would encourage people to take up learning opportunities and promote achievement. Similarly, improving the transport infrastructure would also make a positive contribution on the SA objective.
- 12.46** The assessment against the employment themed policies **TPE1**, **TPE2**, and **TPE3** suggested a positive impact, as in providing new and protecting existing employment sites should help increase the numbers of local people in employment, as would improved retail facilities (**TPE4**). There was an uncertain impact resulting from the retail impact assessment and local thresholds policy (**TPE5**), as refusal of out of town units could depress job opportunities, although the

assessment of the town centre development policy (**TPE6**) appeared to suggest positive impacts, as improving town centres can attract inward investment and lead to the creation of jobs.

- 12.47** As was the case with the assessment of the other transport related policies, **TPT1** was predicted to result in a positive impact by reducing barriers to accessing employment and educational opportunities. Improving people's health and wellbeing (**TPC1**) will have a positive impact on the SA objective, and it was considered that the delivery of better housing (**TPH4**) could encourage people to take up learning opportunities. More affordable housing (**TPH6**) may encourage people to invest in learning opportunities, increase skills and access employment opportunities.
- 12.48** In terms of the area based policies, the Halifax area policy (**HX1**) was recorded as having a positive impact, as the provision of more space for employment opportunities will help increase the numbers of local people in work, as would improved transport links. Regeneration of an area can attract inward investment and provide new jobs. In relation to the town centre element of the Halifax policies (**HX2**), longer term development of more retail space will help create more employment. The North Halifax policy (**HX3**) repeated the positive impacts of HX1 and HX2.
- 12.49** The Brighouse area policy (**B1**), and the Elland area policy (**E1**) both returned the same assessment; by providing more employment space there would be potential to increase the numbers of local people in work, and the other Brighouse (**B2**) and Elland (**E2**) policies were also considered to offer potential for jobs to be created, an assessment repeated against the Sowerby Bridge (**SB1**), Luddenden Dean, Mytholmroyd and Cragg Vale (**LM1**), Hebden Bridge (**HB1**), and Todmorden (**TOD1**) policies.

12

Table 12.6 Summary of impacts on SA 6: To provide the education, and training opportunities to build skills and capacities

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Increased percentage of the local population in work (SO3); Improved transport links (SO7); Improving people's health and wellbeing (SO8);	Extent to which better housing would help reduce unemployment (SO4);	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Provision of employment floorspace (CP2); Provision of town centre floorspace (CP3); Provision of new educational infrastructure (CP14); Provision of transport infrastructure (CP14);	Extent to which better housing would help reduce unemployment (CP4);	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Provision of new employment sites (TPE1);	Restricting out of town retail development may	

Protection of existing employment sites (TPE2); Diversifying the economy (TPE3); Improved retail facilities (TPE4); Attractive town centres can attract investment (TPE6); Improving transport links (TPT1); Improving people's health and wellbeing (TPC1); More affordable housing could may encourage people to invest in learning opportunities (TPH6);	depress job opportunities (TPE5); Extent to which better housing would help reduce unemployment (TPH4);	
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
Provision of employment sites (HX1, HX3, B1, E1); Improved transport links (HX1,HX3); Regeneration of an area (HX1, HX3); Longer term retail development (HX2, HX3); Potential for jobs to be created (SB1, B2, E2, LM1, HB1, TOD1).		

Impact on SA7: To retain, protect and create a quality, locally distinctive built environment.

- 12.50** It was considered there would be a mixed range of impacts resulting from the strategic objectives. The principle of reusing buildings was seen as a positive impact resulting from the sustainable development objective **(SO1)**. However an uncertain impact could arise from the tension between some sustainable development principles and the need to conserve the character of heritage assets. Similarly, there could be a potentially negative impact as a result of the climate change objective **(SO2)**, which could deliver inappropriate development in and around heritage assets. The economy and enterprise objective **(SO3)** could have a positive impact, although it would be dependent on any scheme treating the historic environment as an integral part of any development. Enhancing the exceptional character of Calderdale is considered a particularly important element of the objective. The housing objective **(SO4)** needs to consider the quality of the environment in order to avoid a negative impact.
- 12.51** A positive impact was predicted from the historic environment and design objective **(SO6)**, whilst the transport objective's impacts **(SO7)** should be positive with the proviso that new facilities minimise the impact on the built environment. In terms of minerals extraction **(SO9)**, there was uncertainty as to the overall impact, since there was potential for conflict between the protection of conservation areas and sites of historic significance, and the need to encourage the use of local materials where this is important for the preservation of heritage assets.
- 12.52** A number of the core policies were considered to have a potential impact. The impacts of the spatial option **(CP1)**, were uncertain. The quality of the local character, distinctiveness and design within the historic environment must be taken into account. There is a potential negative effect with the objective and the housing options for Northowram if future development was to affect the conservation area, especially the remaining rural area to the west.
- 12.53** Like the spatial option policy, the assessment of the core policies on employment **(CP2&3)**

and housing (**CP4**) suggested an uncertain impact, since the actual impact would be dependent on development taking into account the quality of the local character, distinctiveness and design within the historic environment. This was also the case with the policies concerned with locations for sustainable growth (**CP8**), development in the Green Belt (**CP10**), Development in the Area Around Todmorden (**CP11**), and High Quality Inclusive Design (**CP12**). There was concern that if the sustainable design and construction policy applied to conversions (**CP13**) then this could result in the loss of important features, for instance windows.

- 12.54** In relation to the sustainable development policies, (**CP5 &6**), one of the core principles of the NPPF relates specifically to the historic environment; it is therefore important that policy **CP6** reflects the NPPF. Impacts from the climate change policy could be negative if this resulted in inappropriate development in, on, or around heritage assets. An uncertain impact results from the policy on infrastructure provision (**CP14**), with a question mark as to whether Community Infrastructure Levy (CIL) funds could be allocated to the conservation of heritage assets affected by specific proposals.
- 12.55** The thematic policies were again considered to result in a mix of impacts. Both **TPE1**, (employment land) and **TPE2** (safeguarding employment land) could have a uncertain impact, as it was considered there may be a potential conflict with heritage assets, conservation areas, and sites of historic significance. Any negative impacts however could be minimised providing that the historic environment is considered as an integral part of any scheme. The same assessment was provided against the thematic policies concerned with diversifying the economy (**TPE3**), the retail hierarchy (**TPE4**), retail impact assessments and local thresholds (**TPE5**), general town centre principles (**TPE6**), local retailing and service provision outside of centres (**TPE7**), cultural provision (**TPE9**), community, health and education (**TCP1**), and allocating land for housing (**TPH1**).
- 12.56** The minerals policies (**TPM1, TPM2**), like the related strategic objective, were both considered to have the potential to cause conflicts with heritage assets, conservation areas, and sites of historic significance, but on the other hand there would be a positive impact from the use of local materials where this is important for the preservation of heritage assets. The Broad Area of Search for Waste policy (**TPW2**) was considered to have potential negative impacts, resulting from the development of waste infrastructure and the impact on historic environment.
- 12.57** Housing development on non allocated sites (**TPH2**) must take into account the quality of local character, distinctiveness and design within the historic environment in order to avoid negative impacts, as should the density of residential development (**TPH3**), the quality of housing (**TPH4**), the mix of housing types (**TPH5**), and affordable housing (**TPH6**). The same assessment was made against flooding (**TPF1**) and the water environment policies (**TPF2**). In identifying the functional role of green infrastructure (**TPNE2**), development and policies need to be aware of the impacts on scheduled ancient monuments, since many are in remote upland areas. The renewable and low carbon energy policy (**TPRE1**) was seen as having a potentially negative impact, as there could be conflict with heritage assets, conservation areas and sites of historic significance. A positive impact was predicted as a result of the policy concerned with the protection and enhancement of the historic environment (**TPHE1**).
- 12.58** A common assessment was reported on the area based policies, in that the actual impact would be dependent on the degree to which the quality of the built heritage is taken into account. Many of the area based policies are predicted therefore to have an uncertain impact.
- 12.59** Of the Halifax area policies, while the policy concerned with delivering the vision (**HX1**) is predicted to have an uncertain impact, the Halifax town centre policy (**HX2**) is predicted to have a strong positive impact on the SA objective. The importance of the historic landscape and buildings of the Kirklees Estate are of particular importance to the Brighouse area policies (**B1** and **B2**). Elland is a conservation area at risk, therefore both Elland policies (**E1** and **E2**)

will need to consider this and the impact of future development. The same applies to the the Todmorden area policy (**TOD1**), as this area too is home to a conservation area at risk. The Northowram Shelf area policy (**NS1**) assessment reported a need to be aware that the landscape and rural setting of the conservation area is a key characteristic of its historical significance. New development, it was suggested would be in conflict with the significance of the area as laid out in the conservation area. The final comment on the area policies was made against the Moors area (**MRS1**), which repeated the need to ensure scheduled ancient monuments are taken into account when considering any development in upland areas.

Table 12.7 Summary of impacts on SA 7: To retain, protect and create a quality, locally distinctive built environment

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Principle of reusing buildings (SO1); Protection and enhancement of historic environment and design (SO6); Minimising the effect of transport on the environment (SO7); Use of local materials to preserve heritage assets (SO9)	Tension between sustainable development principles and conservation of heritage assets (SO1); Need to ensure that historic environment considered as integral part of any scheme (SO3); Need to consider quality of environment (SO4);	Inappropriate development in, on or around heritage assets (SO2); Conflict between the extraction of local materials and protection of conservation areas and sites of historic significance(SO9)
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
	Quality of local character, distinctiveness an design within historic environment to be taken account of (CP1, CP2, CP3, CP4, CP8, CP10, CP11, CP12); Sustainable design and construction methods (CP13) Would funds from CIL be allocated to the conservation of heritage assets (CP14)	Potential negative impact if development in Northowram affected the conservation area (CP1) Inappropriate development in, on or around heritage assets (CP7);
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Use of local materials to preserve heritage	Any negative impacts resulting from development minimised by considering historic environment as	Conflict between the extraction of local materials and protection

assets (TPM1, TPM2); Protection and enhancement of historic environment (TPHE1)	integral to any scheme (TPE1, TPE2, TPE3, TPE4, TPE5, TPE6, TPE7, TPE9, TCP1, TPH1); Need to take account of the quality of local character, distinctiveness and design within the historic environment (TPH2, TPH3, TPH4, TPH5, TPH6, TPF1, TPF2); Green infrastructure developments need to be aware of the impacts on scheduled ancient monuments (TPNE2);	of conservation areas and sites of historic significance (TPM1, TPM2); Impact of waste facilities on the historic environment (TPW2); Potential conflict with renewable and low carbon energy development and historic environments (TPRE1)
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
Halifax town centre policy supports the SA objective (HX2);	Actual impact of all area policies is dependent on the extent to which the built heritage is taken into account; Importance of Kirklees estate of particular importance to Brighouse (B1, B2); Elland and Todmorden are conservation areas at risk (E1, E2, TOD1); The landscape and rural setting of the Northowram conservation area is a key characteristic of its historic significance (NS1); Need to consider impact on scheduled ancient monuments in the upland areas (MRS1)	

Impact on SA 8: To reduce the risk of flooding and resulting detrimental effects on people and property

12.60 A general comment was made against all of the strategic objectives and their impacts on this SA objective. It was suggested that the aims of all the objectives should be to reduce run off generally as part of the overall strategy and to manage and reduce flood risk effectively. This would be achieved by engaging with other agencies to improve upland land management, encouraging development to achieve zero surface water discharge to sewers and watercourses where possible, and otherwise restricting discharge to at the very most to greenfield run off rates. It is suggested that the sustainable development **(SO1)** and climate change strategic **(SO2)** objectives will have a positive impact on this SA objective, with the remainder being uncertain.

12.61 In addition to those comments on the strategic objectives, additional comments of more relevance to the core, thematic and area based policies were submitted. The need to work with the Environment Agency was emphasised, to ensure that all opportunities for the storage of river water in the valley are secured, with particular emphasis upstream of Hebden Bridge. Sites which could provide storage but are also required for development should have planning conditions to provide below ground storage in conjunction with the Environment Agency. It

was also considered that in continuing to develop at risk town centres and potential washland insufficient thought is given to the long term effects and costs to the community. Completion of upstream river flood defence schemes designed to keep water within channel up to certain levels inevitably puts pressure on downstream reaches during those events if no additional storage is provided. As a result of the issues relating to flood risk, it was suggested the Strategic Flood Risk Assessment be updated, and encouragement given to an Environment Agency review of washland and flood storage in the valley.

- 12.62** As a result, some core policies were considered to result in an uncertain impact whilst others were considered to be positive. The policies that were considered to have an uncertain impact were those concerned with the distribution of growth (**CP1**), employment and town centre floorspace requirements (**CP2 and CP3**) the provision of housing (**CP4**), the locations for sustainable growth (**CP8**), Green Belt policies (**CP9, CP10 and CP11**) and the core policy on design (**CP12**).
- 12.63** The policies that were considered to have a potentially positive impact on the SA objective, were the sustainable development related policies, **CP5** and **CP6**, the climate change policy (**CP7**), sustainable design and construction (**CP13**) and the policy on infrastructure provision (**CP14**).
- 12.64** The thematic policies were also considered to have a mixed impact on the SA objective. There were uncertain impacts resulting from policies concerned with provision of employment land (**TPE1 and TPE2**), and retail (**TPE4, TPE5, TPE6 and TPE7**), specifically in relation to the comments on developing at risk centres and Hebden Bridge. The minerals strategy (**TPM1**) could potentially align with long term flood risk management aims, through restoration of quarry sites to provide areas for flood storage, although it was too early to predict the actual impact with any degree of certainty. The residential policy on density (**TPH3**) was considered as having uncertain impacts, for instance lower densities may increase the amounts of open space which could offer temporary flood storage areas, but on the other hand increased densities that increase the use of brownfield land and provide a greater mass for public transport could have a negative impact on that potential aspect of the SA objective.
- 12.65** Proposals for new waste facilities (**TPW3**) and its criteria for development to avoid creating adverse impacts on flood risk, flood storage capacity or flood defences was recorded as having a positive impact on the SA objective. In requiring the allocation of land (**TPH1**) for housing to comply with the wider sustainability objective of the Local Plan a positive impact should result. The reference to sustainable locations for non allocated housing sites (**TPH2**) assumes flood risk is an integral part of the policy. Delivering high quality housing (**TPH4**) was suggested as being supportive of the objective, and in meeting the needs of gypsies, travellers, and travelling showpeople (**TPH7**), the policy supports the objective in terms of referring to the need to avoid allocating sites in areas at high risk of flooding including functional floodplains. As would be expected, the policy concerning flood risk management (**TPF1**), results in a positive impact, as does the water environment policy (**TPF2**). In identifying a green infrastructure hierarchy (**TPNE1**), a positive impact could be delivered, for instance through increased levels of open space, and as a result spaces that act as temporary flood storage areas, which is one of the roles identified for green infrastructure in **TPNE2**. In avoiding development that could lead to adjacent incompatible land uses, the environmental protection (**TPEP2**) policy is considered to support the SA objective. Further positive impacts were recorded against the pollution control (**TPEP1**) and the protection and enhancement of the historic environment (**TPHE1**).
- 12.66** Given their strategic nature, the area based policies were all considered to have an uncertain impact, and the final impact would depend on site allocations. The uncertainty mainly arises from the comments recorded in relation to developing at risk town centres and potential washland. Obviously the recent flooding in the area has emphasised the importance of ensuring that policies and development support the SA objective.

Table 12.8 Summary of impacts on SA 8: To reduce the risk of flooding and resulting detrimental effects on people and property

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Sustainable development principles should make a positive contribution (SO1); Climate change adaptation measures should reduce the risk of flooding (SO2);	Comments applied to all SO's Aim to reduce run off; Need to manage and reduce flood risk effectively; Improving upland management; Encouraging development to achieve zero surface water discharge or at the very most greenfield run off rates; If all these achieved there will be a positive impact	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Sustainable development principles should make a positive contribution (CP5 and CP6); Climate change adaptation measures should reduce the risk of flooding (CP7); Locations for sustainable growth should have a positive impact (CP8) Sustainable design and construction would consider reducing flood risk as integral to a scheme (CP13); Infrastructure provision can include measures to reduce flood risk (CP14)	Uncertain impacts on SA objective from: CP1, CP2, CP3, CP4, CP9, CP10, CP11, CP12 - uncertain impacts arise from the strategic nature of the policies and impacts	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Protecting and enhancing the historic environment (TPHE1); Sustainably located non allocated sites (TPH2); Avoiding development of waste facilities creating adverse impacts on flood risk (TPW3); Delivery of high quality housing (TPH4); Avoiding allocation of sites in flood risk areas (TPH7); Flood risk management (TPF1); Protecting the water environment (TPF2); Increased levels of open space (TPNE1); Temporary flood storage areas (TPNE2); Environmental protection (TPEP2);	Uncertain impacts on SA Objective from: Provision of employment land; Safeguarding employment sites; Development in 'at risk centres'; Density of development; Pollution control;	

Core Strategy Area Based Policies

Positive +	Uncertain ?	Negative X
	Development in 'at risk town centres';	

Impact on SA9: To reduce the effect of traffic on the environment

- 12.67** A positive impact was predicted from a number of strategic objectives. Since one of the principles of sustainable development is to locate development so as to minimise the adverse effects of transport on the environment, **SO1** is seen as supporting the SA objective. By implication, the climate change objective (**SO2**) should reduce the impacts of traffic on the environment, and the reference to 'sustainable locations' in the housing objective (**SO4**), should also lead to considering how to reduce the impacts from traffic and maximising the use of sustainable travel modes. The transport objective (**SO7**) is considered to positively support the SA objective, as it explicitly aims to 'minimise adverse effects' and also refers to reducing the need to travel, which will reduce emissions. Although no predicted impact was recorded against the minerals objective (**SO9**), transporting of materials can have an impact on the local road network, however these impacts need to be balanced against the impacts resulting from the importation of building materials. The waste objective (**SO10**) seeks to minimise the transport impacts of waste management.
- 12.68** The comments recorded against the assessment of the impacts from the core policies suggested that where an impact was predicted, it would be mainly be positive, although a couple of impacts were uncertain. In relation to the spatial option (**CP1**), since the policy required large housing developments to incorporate the full range of services and facilities needed by residents, this assumes it will make it easier for residents to access services via sustainable travel. However, improving the strategic highway infrastructure may potentially increase the attractiveness of car travel within the region, which could lead to an increase in car travel, therefore overall the impact was uncertain. The local sustainable development policy (**CP6**) was suggested to have a potential positive impact, as it requires development to address climate change adaptation and mitigation, which will include consideration of sustainable travel to reduce CO2 emissions, as well as requiring development to be accessed by a number of different travel modes. The climate change policy (**CP7**), aims to reduce travel volumes, and requires development to be accessible by sustainable travel modes, all of which would have a positive impact. There is however a potential negative impact on the SA objective resulting from the policy considering exceptions for rural areas, which could imply that traffic volumes may increase when development is carried out in these areas. In applying the locations for sustainable growth policy (**CP8**), a positive impact would result from the preference for development to be located in areas accessible by public transport, cycling and walking, which should reduce traffic volumes around new developments.
- 12.69** The reference to placing sustainable travel before other motor vehicles makes a positive contribution from the policy concerned with high quality inclusive design (**CP12**). The policy also refers to providing 'trip end' facilities for those opting to cycle or walk to work, such as lockers, showers etc. This would help make sustainable travel more attractive to car users. Remaining with the design aspect, in meeting the Code for Sustainable Homes (CSH) and BREEAM standards (**CP13**), there is a requirement to consider sustainable travel options, therefore it would have a broadly positive impact on the SA objective. It was considered that it was difficult to assess the potential impact resulting from the final core policy on infrastructure provision (**CP14**), as it was dependent on how the funds were used.
- 12.70** Of the thematic policies with an employment theme, providing employment land (**TPE1**) was considered as having a positive impact as a result of encouraging development in areas that

are accessible by public transport as well as pedestrian and cycle routes, which should reduce the effect of commuting and business traffic on the environment. Another positive aspect of this was seen as the resulting reduction in traffic volumes in the local area of the development which could lead to an increase in the number and proportion of non car journeys. There was an uncertain impact as a result of diversifying the economy (**TPE3**), as although it emphasises the need to consider the issues of sustainable travel, it was not clear as to whether the policy would necessarily reduce the effects of traffic on the environment, as opposed to only minimising adverse effects. In applying the principles expressed in the town centre policy (**TPE6**), a positive impact is predicted, especially since the policy encourages proposals to consider accessibility and seek to increase physical activity where possible, which implies active forms of travel and reducing the environmental impacts on town centres resulting from traffic.

- 12.71** In terms of traffic themed policies, an uncertain impact was recorded against the policy concerned with connecting places (**TPT1**). In giving equal priority to both road and rail networks, traffic levels could be affected negatively or positively; the investment decisions criteria are also considered to result in an uncertain impact. The sustainable travel policy (**TPT2**) and its focus on non car travel was expected to result in positive impacts, as was the policy which expresses the transport requirements for site allocations and development proposals (**TPT3**), with its focus on accessibility, and the placing of pedestrians and cyclists above car travel in the design and location of highway works and new developments. Although there was no predicted impact resulting from the minerals policies (**TPM1 and TPM2**) the transport of minerals can have an impact on the local road networks, however this can be minimised by planning conditions. In terms of the waste policies (**TPW1, TPW2 and TPW3**) there was no predicted impacts recorded, though once the Bradford waste facility commences operation in 2016 the transportation of Calderdale's residual municipal waste could have an impact, and once sites are allocated this too will make it easier to assess potential impacts.
- 12.72** The community, health and education policy (**TPC1**) refers to the accessibility criteria set out in TPT3, and therefore supports the SA objective, which is also the case for the policy concerned with allocating land for housing (**TPH1**). The non allocated sites policy (**TPH2**) is suggested to have an uncertain impact, as although reference is made to sustainable locations it was considered this could be loosely interpreted and by itself would not be likely to result in the policy reducing the effect of traffic on the environment. In delivering high quality housing (**TPH4**), the Code for Sustainable Homes was considered to require sustainable travel issues to be taken into account, therefore it would have a broadly positive impact, as would considering, where possible, allowing travellers to live and work on the same site (**TPH7**).
- 12.73** One of the positive aspects of identifying the functional role of green infrastructure (**TPNE2**) was reported to be the provision of attractive walking and cycling routes in Calderdale, with the assumed knock on effects of encouraging greater take up of these modes. The same assessment was suggested against other green infrastructure policies which deal with securing green infrastructure provision (**TPNE3**) and joining up the green infrastructure network (**TPNE4**).
- 12.74** In assessing the impacts of the area based policies, the overall Halifax policy (**HX1**) prioritises development that reduces congestion and improves access especially by public transport, therefore resulting in a positive impact. Another positive impact is envisaged through the statement on larger scale developments delivering a full range of supporting uses, which should help to reduce the need to travel and increase walking and cycling journeys. In relation to the town centre policy (**HX2**), there was potential for both a positive and negative impact. The positive impact was predicted as a result of prioritising improvements to Halifax rail station and the Caldervale line, helping to increase rail use. However, a potential negative impact on this SA objective was suggested as a result of the reference to improving parking links to the town centre, the levels of traffic on the outskirts of the town centre could increase. Improving connectivity between North Halifax (**HX3**) and the town centre by concentrating on sustainable

travel modes would have a positive impact; and as is the case with HX1, a result of larger sites providing the full range of supporting uses would help reduce traffic levels and therefore travel demand.

12

- 12.75** The Brighouse area policies (**B1 and B2**) were considered to have an uncertain impact, as the outcomes of various transport studies and subsequent proposals are as yet unknown and will require monitoring. Both Elland policies (**E1 and E2**) could have a positive impact, due to the support for a new rail station. The Northowram and Shelf area policy (**NS1**) was suggested as having both a positive and negative impact. The positive impacts could result from development being required to address congestion and improve public transport services. Although improvements to the roads may reduce congestion and therefore improve air quality, they may also lead more people to drive and thereby increase emissions. This was also the assessment of the Luddenden Dean, Mytholmroyd and Cragg Vale (**LM1**) area policy.
- 12.76** The Sowerby Bridge area policy (**SB1**) was recorded as having a positive impact, especially if development was required to improve access to and from the railway station, reduce congestion, improve air quality, and maximise opportunities for sustainable travel. A similar impact was predicted as a result of the Hebden Bridge area policy (**HB1**). The Todmorden area policy (**TOD1**) is predicted to support the SA objective as well, since the policy includes criteria on reducing congestion, maximising opportunities for sustainable travel, and improving public transport.

Table 12.9 Summary of impacts on SA 9: To reduce the effect of traffic on the environment

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Locating development to minimise adverse effects of traffic (SO1, SO7); Climate change mitigation measures (SO2); New housing in sustainable locations (SO4); Reducing the need for travel (SO7); Minimising the transport impacts from waste management (SO10);	Transportation of minerals (TPM1);	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Full range of support services and facilities (CP1); Climate change adaptation and mitigation measures (CP6); Reducing traffic volumes (CP7); Development to be accessible by walking, cycling, and public transport (CP8); Priority for sustainable travel over other modes (CP12);	Improving the strategic highway infrastructure (CP1); Policy exception for rural areas (CP7); Impact dependent on the infrastructure delivered (CP14)	

Facilities for cyclists and walkers (CP12); Accessibility criteria should be considered in sustainable design and construction projects (CP13);		
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Encouraging development in areas accessible by sustainable travel (TPE1); Reducing traffic volumes in the local area could increase cycling and walking trips (TPE1); Town centre development to consider accessibility issues (TPE6); Sustainable travel and the focus on non car travel (TPT2); Transport requirements focusing on accessibility, and priority to pedestrians and cyclists (TPT3, TPC1, TPH1); Accessibility criteria should be considered in sustainable design and construction projects (TPH4); Delivering live / work accommodation (TPH7); Provision of attractive walking and cycling routes (TPNE2, TPNE3, TPNE4);	Diversifying the economy (TPE3) Giving equal priority to both road and rail networks (TPT1); Investment decisions criteria result in an uncertain impact (TPT1); Non allocated sites (TPH2);	
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
Priority to development that reduces congestion and improves access by public transport (HX1); Full range of support services and facilities (HX1, HX3); Prioritising improvements to Halifax rail station and the Caldervale line (HX2); Improving connections to and from the North Halifax area (HX3); Support for a new rail station (E1, E2); Reducing congestion and improve air quality (NS1, SB1, HB1, TOD1); Improve public transport (NS1, LV1, TOD1); Improving access to and from the station (SB1, HB1);	Impacts will be better known once sites are allocated (B1, B2);	Improving highway infrastructure could increase car travel (HX2, NS1, LV1);

Impact on SA 10: To protect and enhance biodiversity and SA 12: To protect and enhance the natural, semi natural and manmade landscape

12

- 12.77** Due to the closely related nature of both SA objectives 10 and 12, the following reports on the potential impacts on both the objectives. The sustainable development objective (**SO1**) was assumed to result in positive impacts, as the principles of sustainability should ensure that biodiversity is protected and enhanced. Long term, addressing the causes of climate change (**SO2**) will have a positive impact. In terms of the element of SO2 that refers to adapting to climate change, as long as the impacts on biodiversity are addressed then there should be a positive impact on this aspect of the SA objective. In terms of the economic objective (**SO3**), an uncertain impact was predicted, although a thriving economy may mean that biodiversity is more valued and result in protection and enhancement. The housing objective (**SO4**) could have an adverse impact unless biodiversity is fully considered, while the green infrastructure objective (**SO5**) was suggested as having a positive impact. Although the historic environment and design objective (**SO6**) was not considered to have a positive impact, built structures and historic landscapes can have a high biodiversity value and their retention is unlikely to have an adverse impact providing design principles fully take biodiversity into account.
- 12.78** The transport objective (**SO7**) was predicted to have a positive impact, due to the aim of delivering a sustainable transport system, although this was dependent on any infrastructure changes taking account of biodiversity. The strategic objective concerned with health and wellbeing (**SO8**) was considered to have an uncertain impact on the SA objective; the assessment did record however that improvements to people's health and quality of life can be achieved through the creation and enhancement of wildlife sites. There was an acknowledgement that mineral working (**SO9**) followed by restoration for biodiversity can have a major positive impact on both of the SA objectives. Similarly, the waste objective (**SO10**) was considered to have a potentially positive impact, but only if the siting and restoration of waste sites fully consider biodiversity.
- 12.79** The spatial option core policy (**CP1**) impacts were considered uncertain as it would be largely dependent on the specific locations of site allocations. Increased housing, particularly in areas which are easily accessible to sensitive sites such as the South Pennine Moors may have an adverse impact on biodiversity, primarily due to increased recreational pressure. The impact of employment floorspace requirements (**CP3**) is recorded as being uncertain, again being dependent on the location of site allocations as well as the balance between the use of new sites and existing buildings. The same uncertainty was recorded against the housing policy (**CP4**), with similar reasons concerning the specific locations and impacts on sensitive sites. It was also commented that brownfield sites can have a high biodiversity value, and that larger housing developments can offer opportunities for biodiversity enhancement.
- 12.80** Both sustainable development policies (**CP5 and CP6**) are predicted to avoid having an adverse impact on the SA objective, with the proviso that developments are truly sustainable. Protecting and enhancing local, national and internationally important biodiversity and geodiversity sites will have a positive impact. In terms of climate change (**CP7**), developments which contribute to mitigating and adapting to the predicted impacts of climate change should have a positive impact. It was important however, that renewable energy schemes such as wind turbines do not have an adverse impact on species such as bats and birds. Providing negative impacts on wildlife are avoided, the impact from the locations for sustainable growth policy (**CP8**) would be positive, although it was not possible to say for certain what the impacts would be. A review of the Green Belt (**CP9**) may offer the opportunity to protect sites of wildlife value and release sites of lower value. It was stated that some Green Belt land is currently of low value and development may have a positive impact, and limited development in the Green Belt and Area Around Todmorden as prescribed by **CP10 and CP11** respectively was considered unlikely to have any major adverse effects. High quality innovative design (**CP12**)

was considered to offer potential for development to incorporate integral bat roosting or bird nesting features, whilst sustainable designs (**CP13**) that protect and enhance natural resources and biodiversity will have a positive impact. In providing infrastructure for future development (**CP14**), there was potential for a positive impact, providing climate change mitigation and green infrastructure projects include the restoration and enhancement of biodiversity sites and that other infrastructure projects do not have any adverse impacts.

- 12.81** In relation to the thematic policies, the policy concerned with the provision of employment land (**TPE1**), was suggested as having an uncertain impact, although this was due to the strategic nature of the Core Strategy. Regular reviews of the employment land portfolio should help ensure the sites are sustainable, although this should include a biodiversity assessment. The fact that some brownfield sites can have a high biodiversity was repeated against the assessment of this policy. Safeguarding existing employment sites (**TPE2**) was unlikely to have an adverse impact on either of the SA objectives. A thriving rural economy (**TPE3**) may mean that it is economically viable for some rural sites of current or potential biodiversity value to be managed for the benefit of wildlife.
- 12.82** In terms of transport policies, in making sure places are properly connected (**TPT1**) there would not be any adverse impacts on the SA objectives so long as biodiversity was fully taken into account. In promoting sustainable travel (**TPT2**), it was commented on the importance of avoiding any adverse impacts on wildlife, particularly when enhancing and expanding footpaths, bridleways and cyclepaths. Mineral policy **TPM1** could offer support to the SA objectives, particularly if the restoration of mineral sites delivered benefits for biodiversity. Likewise, in planning for sustainable waste management (**TPW1**), restoration of former landfill sites can bring wild life and landscape benefits. However, there was a potentially negative impact arising from the broad area of search for new waste facilities (**TPW2**) unless current and potential biodiversity value of sites is considered. Developing community facilities (**TPC1**) may increase opportunities for local people to help conserve local sites of wildlife value.
- 12.83** The housing land allocation policy (**TPH1**) the housing density policy (**TPH3**), and the gypsy, traveller and travelling showpeople policy (**TPH7**) could have a negative impact unless current and future biodiversity value is fully considered. However, the policy dealing with non allocated sites (**TPH2**) lists nature conservation as a key consideration and therefore this could support the SA objectives. In delivering high quality housing (**TPH4**), designs which protect and enhance natural resources and biodiversity will have a positive impact.
- 12.84** Like a number of other policies, new development in flood risk zones 1 and 2 (**TPF1**) could have an adverse impact unless current and future biodiversity value is considered, although the water environment policy (**TPF2**) was recorded as having a potentially positive impact, providing opportunities to create or enhance aquatic habitats are secured. Assessment of the green infrastructure policies was largely positive. The provision of up to date green infrastructure information and identifying its functional role through policies **TPNE1** and **TPNE2** is likely to help protect and enhance biodiversity, and providing biodiversity is an integral consideration when securing green infrastructure provision (**TPNE3**) a positive impact should result. Finally, a joined up green infrastructure (**TPNE4**) was seen as having a highly beneficial impact on the SA objectives. Controlling pollution (**TPEP1**) would have a positive impact, with a specific comment made concerning the negative impacts of light pollution on nocturnal wildlife. Promoting renewable and low carbon energy generation (**TPRE1**) would support the SA objectives over the long term, providing adverse effects on wildlife such as migrating fish, birds and bats are considered. The establishment of areas of search will help prevent negative impacts. The final assessment on the thematic policies suggested that buildings and landscape of historical value (**TPHE1**) can have significant wildlife value.
- 12.85** In protecting and enhancing environmental assets a positive impact was predicted against the Halifax area policy **HX1**. Developing a masterplan for North Halifax (**HX3**) was seen as supporting the SA objectives, provided that it included an assessment of current and future

potential biodiversity assets. Both the Brighouse area policy **B1** and Elland area policy (E1) were considered as having potentially adverse effects on the SA objectives, if environmental assets are not protected 'when possible', while there was an uncertain impact as a result of delivering the area vision policies for both areas (**B2 and E2**), unless adverse impacts could be reduced by fully considering biodiversity.

- 12.86** The Northowram and Shelf area policy (**NS1**) was reported as having a potentially positive impact on the SA objectives, through the reference to protection and enhancement of green spaces and improving the existing green infrastructure network, and in Sowerby Bridge (SB1) and Hebden Bridge (HB1), protecting and enhancing the river, canal and surrounding countryside should have a positive impact as well. The same assessment was recorded against the Todmorden policy (**TOD1**), with the additional reference to the benefits of protecting open spaces. All of these positive impacts were dependent on full consideration of biodiversity.
- 12.87** It was reported that there was potential negative impacts from the Ryburn Valley (**RV1**), and Luddenden Dean, Mytholmroyd and Cragg Vale area (**LM1**) policies, as a result of the lack of reference to biodiversity. The overall assessment of the Moors area policy (**MRS1**) was uncertain, although the use of developer contributions to enhance the moorland habitat will have a positive impact, although negative impacts could arise from developments on moorlands outside European designated sites if biodiversity is not taken into account.

Table 12.10 Summary of Impacts on SA10: To protect and enhance biodiversity and SA12: To protect and enhance the natural, semi natural and manmade landscape

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Principles of sustainable development include protecting and enhancing biodiversity (SO1); Addressing the causes of climate change (SO2); Thriving economy may mean biodiversity is more valued (SO3); Green infrastructure should bring benefits (SO5); Delivery of a sustainable transport system (SO7); Improvements to health and well being links in to green open spaces (SO8); Restoration of mineral sites (SO9); If new waste facilities fully consider biodiversity a positive impact would result (SO10);	Need to make sure the impacts on biodiversity are addressed (SO2, SO4); Historic environment and design (SO6); Communities and narrowing the gap objective's impacts are uncertain overall (SO8)	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Sustainable development will have a positive impact (CP5 and CP6);	Impacts dependent on specific development	

<p>Protecting and enhancing local, national and international biodiversity sites (CP6);</p> <p>Development that contributes to mitigating and adapting to climate change (CP7);</p> <p>Potential to incorporate biodiversity features within high quality design (CP12);</p> <p>Protecting and enhancing natural resources and biodiversity (CP13);</p>	<p>locations and sites (CP1, CP3, CP4, CP8);</p> <p>Increased pressure on South Pennine Moors (CP1);</p> <p>Impacts dependent on balance between use of new sites and brownfield sites (CP3, CP4);</p> <p>Brownfield sites can have a high biodiversity value (CP3, CP4);</p> <p>Larger sites can offer opportunities for biodiversity enhancement (CP3, CP4);</p> <p>Important to avoid adverse impacts from renewable and low carbon generation on species such as migrating fish, bats and birds (CP7);</p> <p>Review of the green belt may offer opportunity to protect sites of wildlife value and release sites of lower value (CP9);</p> <p>Impact depends whether infrastructure projects include the restoration and enhancement of biodiversity sites and other infrastructure avoids negative impacts (CP14);</p>	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
<p>Thriving rural economy can increase number of managed sites (TPE3);</p> <p>Restoration of mineral sites (TPM1);</p> <p>Restoration of former landfill sites (TPW1);</p>	<p>Impact dependent on specific development locations and sites (TPE1);</p> <p>Reviews of employment sites should include biodiversity assessment (TPE1);</p>	<p>Area of search for waste facilities needs to consider current and potential biodiversity value of sites is considered (TPW2, TPF1);</p>

<p>Increased opportunities for people to contribute to wildlife conservation (TPC1);</p> <p>Nature conservation as a key consideration (TPH2);</p> <p>Designs which protect and enhance natural resources (TPH4);</p> <p>Opportunities for the creation and enhancement of aquatic habitats (TPF2);</p> <p>Up to date green infrastructure information (TPNE1);</p> <p>Identifying green infrastructure's functional role (TPNE2);</p> <p>Joined up green infrastructure network (TPNE4);</p> <p>Controlling pollution (TPEP1);</p> <p>Establishing areas of search for renewable and low carbon projects (TPRE1);</p> <p>Buildings and landscapes of historical value can have significant wildlife value (TPHE1);</p>	<p>Some brownfield sites can have a high biodiversity value (TPE1);</p> <p>Making sure places connected unlikely to have any significant impacts as long as biodiversity fully considered (TPT1);</p> <p>Need to fully consider impact of sustainable travel on wildlife (TPT2);</p> <p>Need to fully consider impacts from development (TPH1, TPH2, TPH3, TPH7);</p> <p>Need to fully consider biodiversity when securing green infrastructure provision (TPNE3);</p> <p>Important to avoid adverse impacts from renewable and low carbon generation on species such as migrating fish, bats and birds, though long term should be positive (CP7);</p>	
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
<p>Protecting and enhancing environmental assets (HX1);</p> <p>Protection and enhancement of green spaces and green infrastructure (NS1);</p> <p>Protecting and enhancing the river, canal and surrounding countryside (SB1, HB1, TOD1);</p> <p>Protecting open spaces (TOD1);</p> <p>Use of developer contributions to enhance moorland habitats (MRS1);</p>	<p>Master plan for the north Halifax area needs to assess current and future potential biodiversity assets (HX3);</p> <p>Need to fully consider biodiversity (B2, E2);</p>	<p>Concern over policy wording on environmental assets (B1, E1)</p> <p>Lack of reference to biodiversity (LM1, RV1);</p> <p>Developments on moorland outside European designated sites (MRS1);</p>

Impact on SA11: To reduce pollution levels and CO2 emissions to target levels

12.88 Sustainable development (**SO1**) is integral to achieving the SA objective and is expected to impact positively not only in terms of the CO2 emissions produced during development but

also the energy use once the development is occupied. The climate change objective **(SO2)** is also seen as having a positive impact, although there was a suggestion that it should read differently; this was because it was felt that addressing the causes of climate change is beyond the role of the Local Plan as these occur on a much wider area than just locally, however it can help reduce Calderdale's climate change emissions. An uncertain impact was predicted resulting from the economy and enterprise objective **(SO3)**, as it requires a commitment and focus to decouple carbon emissions from economic growth and using the opportunities within the low carbon sector to positively impact on the SA objective to reduce pollution and CO2 emission levels. If the word 'sustainable' in the housing objective **(SO4)** means environmental sustainability, including being energy and resource efficient, then the impact will be reduced and could be positive. However, increasing population and the resulting housing levels is likely to have a negative impact on the aim to reduce CO2 emissions, although if it was delivered as described in SO4 then the impact would again be reduced. The refurbishment and retrofit of the existing housing stock to make it fit for purpose will be an integral part of meeting targets.

12

- 12.89** The aims expressed through the green infrastructure and the natural environment objective **(SO5)** are predicted to have a positive impact on air and water quality, and an indirect impact on reducing CO2 emissions. Another positive impact was recorded as a result of using appropriate energy efficiency measures to improve the quality of heritage assets **(SO6)**, especially the housing stock. Achieving the transport objective **(SO7)** would reduce traffic volumes and improve the transport networks to encourage greater use of sustainable modes of travel and therefore reduce CO2 emissions and improve air quality. Positive impacts were recorded against both the minerals **(SO9)** and waste **(SO10)** objectives; specific comments against the waste objective predicted a reduction in greenhouse gas emissions derived from waste disposal and transport.
- 12.90** In terms of the spatial option **(CP1)**, the extent of impacts would be determined by the additional infrastructure, an example of a positive impact would be the installation of a district heating network when new housing or retail is developed. Similarly, improvements to a rail line could have a positive impact on pollution and CO2 levels. The impact of **CP2** will depend on the nature of expansion of employment sites. There will be opportunities to contribute positively by improving existing sites energy efficiency while expanding, by creating low carbon innovation employment sites, and by linking to district heating networks. Another key impact will be around increased transport use if the sites developed do not have adequate public transport links both locally and regionally. Development within existing town centres **(CP3)** will have a reduced impact compared to out of town development. As with CP2 it was suggested that installing district heating networks could make a positive contribution. In relation to the core housing policy **(CP4)**, it was recommended that to help achieve a positive impact the policy should include a specific mention about improving the energy efficiency of the existing housing stock. This would also have a positive impact on the populations health and well being as well as fuel poverty targets. In terms of the additional housing suggested, the assessment also recommended establishing a sustainability target.
- 12.91** Both sustainable development policies **(CP5 and CP6)** were reported as having positive impacts, although it was suggested that reference to carbon reduction targets was made. This was also the case with the climate change policy **(CP7)**, which, although the assessment predicted positive impacts, there was a recommendation that there was a specific reference to actual carbon reduction targets. In establishing locations for sustainable growth **(CP8)** the reduction in travel demand would have a positive impact on both air quality and carbon emissions. Securing high quality inclusive design **(CP12)** was predicted to have a positive impact on the SA objective overall, as was the sustainable design and construction policy **(CP13)**. If the infrastructure provision policy **(CP14)** was directed towards carbon reduction projects, then a positive impact could be secured, but the assessment was uncertain at present.

- 12.92** In relation to the thematic policies, a number were reported to have the potential to make a positive impact on the SA objective. The part of the employment land policy (**TPE1**) which is concerned with ensuring sites are accessible by good quality public transport and pedestrian and cycle links could help reduce pollution. The focus on Halifax town centre for office development could also bring benefits to the SA objective. Uncertain impacts were recorded against the policy concerned with safeguarding existing employment sites (**TPE2**), and the policy dealing with diversifying the economy (**TPE3**). Specific comments against the latter pointed out that a focus on low carbon innovation was missing from the policy. This could have a big impact on communities for economic diversification and resilience. Support for business development in this area would help the Calderdale economy as a whole and ensure that local businesses are at the forefront of innovation and change. In terms of the retail hierarchy (**TPE4**), the presumption against further out of town retail development could have a positive impact, as could a focus on improving retail provision in neighbourhood centres. Because the retail impact assessment and local thresholds policy (**TPE5**) does not include criteria relating to the low carbon agenda and a commitment to carbon reduction, an uncertain impact is recorded, which is also the assessment of town centre principles policy (**TPE6**), and the local retailing and service provision outside of centres policy (**TPE7**).
- 12.93** In making sure places are connected (**TPT1**), it was recommended the policy criteria include reducing carbon; overall without mention of this element the assessment of impacts was uncertain. The sustainable transport policy (**TPT2**) was expected to make a positive contribution, as was the transport requirement for site allocations and development proposals (**TPT3**). There were no predicted impacts from the minerals policies (**TPM1 and TPM2**), although it is important to monitor the impacts resulting from the transport of minerals. Planning for sustainable waste management could have a positive impact (**TPW1**), although it could be beneficial to include reference to waste miles travelled, and include a criteria to keep this to a minimum. Overall a positive impact was predicted from the broad area of search for new waste facilities (**TPW2**), as well as the development management policy that addresses proposals for new waste facilities (**TPW3**). There were uncertain impacts recorded against the community, health, and education policy (**TPC1**), although a focus on the continued support for local services can have a positive impact on carbon reduction.
- 12.94** Concerning the allocation of land for housing (**TPH1**), inclusion of the wider sustainability objectives will result in maintaining the commitment to reduce carbon emissions and improve the local environment, although until site specific details are known the impact was considered uncertain. The assessment of the non allocated sites policy (**TPH2**) noted there was no mention of the materials used for development, which could have a considerable environmental impact. It would assist the SA objective if the policy included a reference to considering the use of locally sourced building materials, and that consideration is given to alternative energy generation on non allocated sites. A positive impact was recorded against the policy on delivering high quality housing (**TPH4**), and a positive feature of the affordable housing policy (**TPH6**) was the reference to sustainable development. Specific site development for temporary housing use (**TPH7**) with adequate environmental protection for water courses will have a positive impact.
- 12.95** The effective management of surface water run off (**TPF1**) will have a positive impact and to recognise the impact of climate change can help to further the carbon reduction agenda, as could the criteria outlined in the water environment policy (**TPF2**). All four green infrastructure related policies (**TPNE1, TPNE2, TPNE3, and TPNE4**) are predicted to have a positive impact, this could be through encouraging more sustainable forms of travel; positive impacts are also reported against the pollution control (**TPEP1**) and environmental protection (**TPEP2**) policies. The commitment to renewable and low carbon energy (**TPRE1**) provision is considered too low to meet the commitment of Calder Energy Future - it is suggested the target as set will be met by the re powering of the Ovenden Moor wind farm. In the assessment of protecting and enhancing the historic environment (**TPHE1**), a suggestion was made to include a criteria

setting out the ambition to deliver low carbon improvements to local heritage assets while maintaining conservation principles, as well as embracing the use of renewable and low carbon energy alongside conservation.

- 12.96** No specific comments were received against the area based policies; however many of the core and thematic policies will apply to development within these locations and therefore the comments on these will be taken into account.

12

Table 12.11 Summary of impacts on SA11 To reduce pollution levels and CO2 emissions to target levels

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
<p>Reducing CO2 emissions (SO1, SO2);</p> <p>Energy efficient development (SO1, SO2);</p> <p>Retrofitting and refurbishment of existing dwelling stock (SO4);</p> <p>Green infrastructure should have a positive impact on air and water quality (SO5);</p> <p>Using appropriate energy efficient measures to improve heritage assets (SO6);</p> <p>Reducing traffic volumes and improving transport networks (SO7);</p> <p>Use of local minerals (SO9);</p> <p>Reduced greenhouse gas emissions from waste disposal (SO10);</p>	<p>Addressing the causes of climate change beyond the role of the Local Plan (SO2);</p> <p>Requires commitment to decouple carbon emissions from economic growth (SO3);</p> <p>Increased housing likely to have a negative impact on carbon emissions but this would be reduced if delivered sustainably (SO4);</p>	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
<p>Development within town centres will have a reduced impact compared to out of town development (CP3);</p> <p>Inclusion of sustainable development policies (CP5, CP6)</p> <p>Climate change measures (CP7);</p> <p>Reducing travel demand will improve air quality and carbon emissions (CP8);</p> <p>High quality inclusive design (CP12);</p> <p>Sustainable design and construction should deliver positive impacts (CP13);</p>	<p>Impacts of spatial option determined by additional infrastructure (CP1);</p> <p>Impacts dependent on nature of employment sites (CP2);</p> <p>Lack of reference to improving energy efficiency of existing housing stock (CP4);</p> <p>Lack of reference to carbon reduction targets (CP5, CP6, CP7);</p> <p>Dependent on what infrastructure is delivered (CP14);</p>	

Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
<p>Ensuring sites are accessible by good quality public transport and pedestrian and cycle links (TPE1);</p> <p>Focus on Halifax town centre for office development (TPE1);</p> <p>Presumption against out of town retail development (TPE4);</p> <p>Improving small scale retail provision in neighbourhoods (TPE4);</p> <p>Enabling sustainable travel (TPT2);</p> <p>Transport requirements for site allocations and proposals (TPT3);</p> <p>Requirements for new waste facilities (TPW1, TPW2, TPW3);</p> <p>Delivery of high quality housing (TPH4);</p> <p>Affordable sustainable housing (TPH6);</p> <p>Specific sites for temporary housing will ensure protection for water courses (TPH7);</p> <p>Effective management of surface water run off (TPF1);</p> <p>Recognising the impact of climate change (TPF1);</p> <p>Protecting the water environment (TPF2, TPEP2);</p> <p>Encouraging sustainable forms of travel (TPNE1, TPNE2, TPNE3, TPNE4);</p> <p>Controlling pollution (TPEP1);</p>	<p>Uncertain impacts from safeguarding employment sites (TPE2);</p> <p>Lack of reference to low carbon (TPE3, TPE5, TPE6, TPE7, TPT1);</p> <p>Extent of impact resulting from the community, health and education policy (TPC1);</p> <p>Impact uncertain due to lack of allocated sites and specific details (TPH1);</p> <p>Lack of reference to the materials used and alternative energy generation (TPH2);</p> <p>Target for renewable and low carbon energy generation is too low (TPRE1);</p> <p>Lack of reference to low carbon improvements to local heritage assets (TPHE1);</p>	
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
No specific comments made - considered impacts dependent on outcome of site allocations	No specific comments made - considered impacts dependent on outcome of site allocations	No specific comments made - considered impacts dependent on outcome of site allocations

Impact on SA13: To ensure prudent and efficient use of natural resources and energy

- 12.97** A positive impact was recorded against the sustainable development objective (**SO1**), although the question was asked as to whether there would be a definition of sustainable development. A local sustainable approach will be to use locally available construction materials, to make use of the local landscape for energy resilience and to site new development in areas which

can take advantage of these resources. The same assessment of impacts was recorded against the climate change objective (**SO2**) on this SA objective as was the case with SA 11. Therefore although a positive impact is predicted, the objective should reflect the issues around the causes of climate change occurring at a wider than local level. An uncertain impact results from **SO3**; in making the assessment there was an assumption that reference to sustainable in the context of the economy and enterprise objective did not relate directly to a low carbon economy. For a truly positive impact the objective could be amended to refer to an ambition to create a resilient low carbon economy through the low carbon agenda and making use of local energy opportunities. An uncertain impact also results from the housing objective (**SO4**), due mainly to the absence of any reference to low carbon or energy efficiency. The green infrastructure objective (**SO5**) was considered to have a positive impact, whilst the assessment of the historic environment and design objective (**SO6**) reported an uncertain impact on the SA objective, and that it would be beneficial to link the management of heritage assets to the rest of landscape resources, particularly water, energy and materials. The transport objective (**SO7**) was seen as having a positive impact, as was the minerals objective (**SO9**). Although the waste objective (**SO10**) was recorded as supporting the SA objective, making reference to a commitment to the waste hierarchy would increase the positive impacts.

- 12.98** In assessing the spatial option policy (**CP1**), the focus of growth within the town centre areas opens up the possibility to deliver district heating networks and share energy resources between public, private and housing development, therefore opportunities for this should be explored through the distribution of growth. Although the infrastructure section mentions transport, it does not mention energy infrastructure; this will become increasingly important for energy resilience especially for business but also for housing. Overall, the assessment against the spatial option was reported to be uncertain. In terms of employment floorspace (**CP2**), the assessment pointed out that there is research to show that emerging employment opportunities will be within the low carbon economy and that clustering businesses within this sector enhances innovation. Although the policy is predicted to have a positive impact, this would be enhanced if policies included a commitment to developing low carbon and energy business hubs on employment land. The provision of housing policy (**CP4**) was considered to have a potentially uncertain impact on the SA objective, and comments were made that suggested retro fitting existing housing to energy efficient standard should be considered an integral part of meeting the housing need in order to fully satisfy the SA objective. The model sustainable development policy (**CP5**) was seen as having a positive impact, however the local sustainable development policy (**CP6**) was suggested as having an uncertain impact, as there was no specific mention of locally generated energy sources. The climate change policy (**CP7**) was reported as having positive impacts, as was the locations for sustainable growth policy (**CP8**). The policy that addresses the extent of the Green Belt (**CP9**) was considered as having uncertain impacts. One of the positive impacts on the SA objective as a result of the Area Around Todmorden policy (**CP11**) was the promotion of the reuse and adaptation of existing buildings. Another was the considerable opportunity in the Todmorden area to develop self sufficient energy communities and to build on the success of a local resilient food resource through 'Incredible Edible Todmorden'.
- 12.99** The high quality, inclusive design policy (**CP12**), was recorded to have an uncertain impact, and although the sustainable design and construction policy (**CP13**) includes a commitment to development obtaining either the Code for Sustainable Homes (CSH) or BREEAM energy efficiency ratings, it does not include energy generation necessarily, therefore this needs to be included as a separate criteria. The final assessment of the core policies reported that the infrastructure provision policy (**CP14**) needs to refer to local energy infrastructure leading to resilience.
- 12.100** Comments made against the policy on providing employment land and premises (**TPE1**) highlighted that future need for employment will include low carbon centres for innovation and incubation; this can be supported by this policy if it is included as an ambition and will

ensure that Calderdale business entrepreneurs are not left behind. There was an uncertain impact from the safeguarding of employment sites (**TPE2**), whilst the policy that is concerned with diversifying the economy (**TPE3**) was considered to have missed an opportunity with the lack of a specific reference to support diversification into the low carbon economy. The assessment of the general town centre principles (**TPE6**) policy expressed an uncertain impact, although this was down to issues beyond the role of the Local Plan.

12.101 The sustainable travel policy (**TPT2**) was reported as having a positive impact, especially by having a clear commitment to the delivery of electric charging points. The minerals strategy policy (**TPM1**) was considered to have an uncertain impact, as it was felt that there was a need to protect the existing carbon sinks including the peat reserves through sustainable farm management practices. Similarly, the uncertain impact awarded to the minerals safeguarding policy (**TPM2**) was as a result of the lack of any reference to safeguarding peat reserves. All three of the waste policies (**TPW1, TPW2 & TPW3**) were considered as having a positive impact. In terms of allocating land for housing (**TPH1**) and development on non allocated sites (**TPH2**) there was a suggestion that the impacts on the SA objective could be enhanced if the potential for district heating networks are considered as part of identifying sites or assessing proposals on non allocated sites. The policy on high quality housing (**TPH4**) would make a more positive contribution if it referred to the exploration of renewable energy options as well as energy efficiency. In relation to the links between energy efficiency and affordable housing, the assessment against policy (**TPH6**) commented that enhanced energy efficiency and renewable energy generation will help towards making housing affordable, especially for residents that are experiencing fuel poverty; the national schemes are more likely to benefit those who are able to pay. Inclusion of renewable energy schemes on affordable housing developments will support this SA objective; as it stands at present there is an uncertain impact predicted. Ensuring pipes do not leak will help to conserve water resources, although the extent to which the water environment policy (**TPF2**) would help support the SA objective is recorded as being uncertain. All of the green infrastructure policies (**TPNE1, TPNE2, TPNE3, & TPNE4**) were considered to have a positive impact, while the minimum targets expressed in the renewable and low carbon energy policy (**TPRE1**) were not considered enough to meet the 40% carbon reduction the Council has committed itself to.

12.102 In terms of the area based policies, there was only one comment related to a specific area; the Halifax policy (**HX1**) presented opportunities to use the density and mix of buildings in Halifax town centre to build a district heating network and focus on building local energy infrastructure; this focus should be referred to in the policy in order for a positive impact to be secured on the SA objective. There was also an opportunity to make statements of energy and carbon reduction ambition using the development of heritage assets including the Piece Hall. A general comment was also made concerning all the areas; it was recommended that each area required a feasibility study on the renewable energy opportunities most suitable for the area, or for opportunities to develop renewable and low carbon projects to be included in the area based policies.

Table 12.12 Summary of Impacts on SA13: To ensure prudent and efficient use of natural resources and energy

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Positive impacts from sustainable development (SO1);	Consider definition of sustainable development (SO1); Addressing the causes of climate change beyond the role of the Local Plan (SO2);	

Climate change adaptation and mitigation measures (SO2); Contribution of green infrastructure (SO5); Improving the transport networks (SO7); Use of local materials (SO9); Positive impacts from the waste objective could be increased by reference to the waste hierarchy (SO10);	Assumption that reference to sustainability did not relate directly to low carbon economy (SO3); Lack of reference to low carbon or energy efficiency (SO4); Beneficial to link the management of heritage assets to the rest of the landscape resources, particularly water, energy and materials (SO6);	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Focusing growth in and around existing towns opens up possibilities for district heating networks (CP1); Positive impacts enhanced if it included a commitment to developing low carbon and energy business hubs (CP3); Sustainable development policies should have a positive impact (CP5); Positive impacts from climate change adaptation and mitigation (CP7); Development in sustainable locations (CP8); Promotion of the reuse and adaptation of existing buildings (CP11); Opportunity to build on the success of 'Incredible Edible' (CP11);	Lack of reference to energy infrastructure (CP1); The retro fitting of the existing stock should be integral to meeting the housing need (CP4); No specific reference to locally generated energy sources (CP6); Extent of the Green Belt policy (CP9); High quality inclusive design (CP12); Need to include an energy generation criteria in the sustainable design and construction policy (CP13); Infrastructure provision policy needs to refer local energy infrastructure (CP14);	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Clear commitment to electric car charging points (TPT2); New waste facilities (TPW1, TPW2, TPW3); Reference to energy efficiency of buildings (TPH4); Delivery and protection of green infrastructure networks	Future need for employment will include low carbon centres for innovation and incubation (TPE1); Uncertain impact from safeguarding employment sites (TPE2); Lack of reference to support diversification into the low carbon economy (TPE3);	

(TPNE1, TPNE2, TPNE3, TPNE4)	<p>Uncertain impact from town centre principles largely as a result of issues beyond the role of the Local Plan (TPE6);</p> <p>Need to protect existing carbon sinks, including peat reserves (TPM1);</p> <p>Lack of reference to safeguarding peat reserves (TPM2);</p> <p>Need to consider potential for district heating networks (TPH1, TPH2);</p> <p>Positive impacts enhanced if policy refers to renewable and low carbon energy generation (TPH4);</p> <p>Need to promote the inclusion of renewable energy schemes on affordable housing developments (TPH6);</p> <p>Target for renewable and low carbon energy generation is too low (TPRE1);</p>	
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
	<p>Refer to district heating networks in the policy on Halifax (HX1);</p> <p>Opportunities to make statements of energy and carbon reduction using the development of heritage assets (HX1)</p> <p>Each area requires a feasibility study on renewable energy opportunities most suitable for the area;</p>	

Impact on SA14: To ensure efficient use of land

12.103 By ensuring development adopts sustainable development principles (**SO1**), positive support for this SA objective was expressed. In terms of addressing climate change (**SO2**) there could be both positive and negative impacts. Adapting to climate change can include use of open space as temporary flood storage which results in land having more than one beneficial use. It can also include reducing the density of development, which it could be argued can have a negative impact on the SA objective. An uncertain impact was recorded against the economy and enterprise objective (**SO3**), whilst the housing objective (**SO4**) was considered to result in a positive impact, by virtue of reference to maximising the use of previously developed land and the efficient use and improvement of the existing housing stock. Although the green infrastructure objective (**SO5**) does not specifically mention sustainable travel, there is an assumption that it would help support the SA objective, as it can involve the use of existing infrastructure. In protecting and enhancing the historic environment (**SO6**), existing buildings will be maintained, resulting in a positive impact, as will ensuring development incorporates high quality inclusive design. Reducing the need to travel (**SO7**) implies that mixed use developments will be encouraged, which would have a positive impact on the SA objective, while the assessment of the mineral objective (**SO9**) considered that mineral extraction followed by beneficial restoration schemes can have a positive impact, as well as the increased use of recycled aggregates. The impact of the waste objective (**SO10**) was suggested to be uncertain, although by continuing to reduce the amount of waste disposed of in landfill over the longer term the impacts from the objective would be positive.

- 12.104** The spatial option policy (**CP1**) was recorded as having an uncertain impact. Although focusing development on the main towns in the district is likely to have a positive impact on the SA objective, as this is where the majority of brownfield land is, the exact impacts are only likely to be established once specific sites are known. A similar uncertain impact was established against the employment floorspace requirement policy (**CP2**), although reference to the intensification of existing employment sites was likely to be beneficial. The town centre floorspace policy (**CP3**) was predicted to have positive outcomes, due to the likelihood of bringing vacant units back into use, provide jobs, and support the town centres in the district. The core housing policy (**CP4**) was assessed to be in support of the SA objective, due to the priority given to brownfield land and the conversion of existing buildings, and since one of the principles of sustainable development is to ensure efficient use of resources (including land), both **CP5** and **CP6** were considered to have a positive impact. As was the case with the strategic objective on climate change, the core policy (**CP7**) was suggested to have an uncertain impact, as a result of some tensions between the SA objective and climate change adaptation methods. In prioritising brownfield land, the locations for sustainable growth policy (**CP8**) was seen as having a positive impact, while focusing development on the urban areas (**CP9 and CP10**) and the reuse and adaptation of existing buildings (**CP11**) will increase the amount of brownfield land developed, although the impacts of the policies on actual site layout and design is uncertain. The delivery of high quality, inclusive designed developments (**CP12**) would be likely to support the SA objective, but the extent to which they do will depend on the specifics of each scheme. Sustainable design and construction criteria expressed in **CP13** were assumed to result in beneficial impacts, not only through buildings but the spaces between them, linking in with some of the climate change adaptation techniques. The provision of necessary infrastructure as set out in policy **CP14**, was considered likely to be supportive of the SA objective.
- 12.105** In providing employment land and premises (**TPE1**) there is support for the SA objective through provision of an up to date portfolio of employment land, focusing office development in the main urban centres and supporting regeneration policies; similarly protecting employment sites (**TPE2**) will ensure that the majority of businesses will remain in the urban areas and direct new employers to existing sites and premises. In diversifying the economy (**TPE3**), part of the policy refers to the reuse and adaptation of existing buildings which will provide a positive impact. The uncertainties with all three policies will arise from site specific proposals. The retail hierarchy (**TPE5**) focuses new retail development to existing centres, again resulting in positive impacts, while the retail impact assessments and local thresholds policy (**TPE6**) was considered to have an uncertain impact. All three elements of the general town centre principles policy (**TPE6**) are recorded as having a positive impact; focusing attractions within the town centres will help maintain their vitality and viability, improving access is an efficient use of land, as is an enhanced environment. In addressing local retailing and service provision outside of the town centres (**TPE7**), the criteria outlined intends to strike a balance between protecting the established retail centres and the identified local need. Another positive impact could result from redeveloping an existing store. Again uncertainties were expressed due to the strategic nature of the policy.
- 12.106** Development which meets the investment criteria in the policy concerned with making sure places are properly connected (**TPT1**), would support the SA objective, and improving and enhancing existing transport infrastructure (**TPT2**) would also make a positive contribution. An uncertain impact was recorded against policy (**TPT3**), reflecting the need to consider site specific transport impacts on the objective.
- 12.107** In relation to minerals (**TPM1**), a number of positive impacts relating to the SA objective were suggested, including the fact that minerals is a temporary land use, promoting extensions of existing sites, maximising the use of recycled and secondary aggregates, protecting potential mineral resources from being sterilised by non mineral development, minimising waste and ensuring the restoration of mineral sites resulted in a beneficial use. The exact impacts will

be determined by specific proposals. Policy **TPM2** refers to the importance of avoiding potential mineral resources being sterilised by non mineral development, which links in with the efficient use of land. Reducing the amount of waste that ends up in landfill (**TPW1**) will have a positive impact, as will the requirement for development to be consistent with the waste hierarchy. Focusing the search for new waste facilities (**TPW2**) within the urban areas (especially existing waste sites) or safeguarded sites will help support the objective by directing proposals to brownfield land and former mineral sites. The exact impact will depend on site layouts and specific proposals (**TPW3**). The impacts of the provision of community, health and education facilities (**TPC1**) would also be determined by the nature of individual proposals.

- 12.108** In prioritising brownfield land when allocating land for housing (**TPH1**) a positive impact was predicted, and ensuring non allocated sites (**TPH2**) meet certain criteria will also support the SA objective. Where the allocation is on greenfield land it will be depend on the site layout, which is where the uncertainty arises from both policies. In securing a range of residential densities (**TPH3**) a positive impact is suggested, and while there are uncertainties, positive impacts are also predicted from the high quality housing policy (**TPH4**) due to references to the replacement of existing dwellings, and increasing the energy efficiency of existing dwellings. An uncertain impact was suggested as a result of securing a mix of housing types and sizes (**TPH5**), as well as the policy on affordable housing (**TPH6**) and gypsies, travellers, and travelling showpeople (**TPH7**), although this policy does have a focus on urban areas.
- 12.109** In terms of flood risk (**TPF1**) and the SA objective, avoiding development in areas at higher risk of flooding and directing it to areas at a lesser risk would support the objective; such an approach could also increase the number of open spaces that preform a temporary flood storage role. On the other hand, this could lead to more greenfield development and lower densities. Identifying under utilised green infrastructure assets (**TPNE1**) meets the SA objective, as could the use of existing green infrastructure networks to promote sustainable travel. In securing better land management (including woodland and moorlands) a positive impact would result from **TPNE2**; other positive impacts result from identifying and improving degraded land, provision of flood storage areas, and the promotion of sustainable drainage systems. Securing green infrastructure provision (**TPNE3**) was considered to have an uncertain impact, as was a joined up green infrastructure network (**TPNE4**). Protecting and enhancing the historic environment (**TPHE1**) is likely to see buildings maintained and brought back into use and therefore supports the aims of the SA objective.
- 12.110** The overall impacts from delivering the Halifax vision (**HX1**) were considered uncertain, although certain elements of the policy, such as focusing office development in the town centre, the retail hierarchy, and regeneration should provide a positive impact. Ensuring the main town centre area (**HX2**) is supported by future development should have a positive impact. Improving access for those in the greatest need to various facilities (**HX3**) is an efficient use of land, however the overall impact will be dependent on the layout of schemes. For both the Brighouse area policies (**B1 and B2**) and the Elland area policies (**E1 and E2**) the impacts will depend on the site allocations and specific developments. The Northowram and Shelf area policy (**NS1**) impacts are uncertain, although meeting at least one of the specified criteria supporting the overall spatial strategy is likely to have a positive impact. This was also the assessment recorded against the Sowerby Bridge area policy (**SB1**), the Luddenden Dean, Mytholmroyd and Cragg Vale area policy (**LM1**), the Hebden Bridge area policy (**HB1**), and the Todmorden area policy (**TOD1**).

Table 12.13 Summary of impacts on SA14: To ensure efficient use of land

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
<p>Adopting sustainable development principles (SO1);</p> <p>Adapting to climate change through the use of open space as temporary flood storage (SO2);</p> <p>Reference to maximising the use of previously developed (SO3);</p> <p>Assumption that green infrastructure would support the SA objective by provision of walking and cycling networks (SO5);</p> <p>Maintaining and enhancing existing buildings (SO6);</p> <p>Reducing the need to travel (SO7);</p> <p>Local mineral extraction and subsequent restoration (SO9);</p> <p>Increased use of recycled aggregates (SO9);</p> <p>Reducing the amount of waste disposed in landfill sites (SO10);</p>	<p>Impact of employment objective uncertain, dependent on specific nature of sites (SO3);</p>	<p>Reducing density of development (SO2)</p>
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
<p>Intensification of existing employment sites (CP2);</p> <p>Bringing vacant town centre units into use (CP3);</p> <p>Priority given to development on brownfield land (CP4, CP8);</p> <p>Conversion of existing buildings (CP4);</p> <p>Ensuring efficient use of resources (CP5, CP6);</p> <p>Adapting to climate change through the use of open space as temporary flood storage (CP7);</p> <p>Focusing development on the urban areas (CP9, CP10);</p> <p>Reuse and adaptation of existing buildings (CP11);</p> <p>Beneficial impacts from buildings and spaces incorporating sustainable design and construction measures (CP13);</p> <p>Provision of necessary infrastructure (CP14);</p>	<p>Though focusing development in locations where the majority of brownfield land is positive, overall impact dependent on the specific nature of sites (CP1, CP2);</p> <p>Impact of policies on site layout and design uncertain (CP8, CP9, CP10, CP11, CP12);</p>	<p>Reducing density of development (CP7);</p>

Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
<p>Provision of an up to date portfolio of employment land (TPE1);</p> <p>Focusing office development in the main urban centres and supporting regeneration (TPE1);</p> <p>Protecting existing employment sites (TPE2);</p> <p>Reuse and adaptation of existing buildings (TPE3, TPHE1);</p> <p>Focusing new retail and other development in existing centres (TPE5, TPE6);</p> <p>Improving access to services and facilities (TPE6);</p> <p>Improving the environment in town centres (TPE6);</p> <p>Redevelopment of existing retail stores (TPE7);</p> <p>Investment criteria relating to connecting places (TPT1);</p> <p>Improving and enhancing existing transport networks (TPT2);</p> <p>Mineral extraction is a temporary land use (TPM1);</p> <p>Promoting the extension of existing sites (TPM1);</p> <p>Maximising the use of recycled and secondary aggregates (TPM1);</p> <p>Protecting potential mineral resources (TPM1, TPM2);</p> <p>Reducing levels of waste disposed of in landfill (TPW1);</p> <p>Broad area of search for new waste facilities (TPW2);</p> <p>Prioritising brownfield land (TPH1);</p> <p>Delivering an appropriate range of densities (TPH3);</p> <p>Replacement of existing dwellings (TPH4)</p> <p>Minimising flood risk (TPF1);</p> <p>Identifying under utilised assets (TPNE1);</p> <p>Use of existing green infrastructure for sustainable travel (TPNE1);</p> <p>Better land management (TPNE2);</p> <p>Identifying and improving degraded land (TPNE2);</p> <p>Provision of flood storage areas (TPNE2);</p>	<p>Retail impact assessments and local thresholds (TPE6);</p> <p>Overall impact of local retailing and service provision due to strategic nature of development (TPE7);</p> <p>Impact dependent on specific nature of sites (TPT3, TPW3, TPC1, TPH2, TPH5, TPH6, TPH7);</p> <p>Dependent on the nature, location and extent of the green infrastructure provision secured (TPNE3);</p> <p>Extent of the impact from a green infrastructure network (TPNE4);</p>	<p>Could increase levels of greenfield development (TPF1);</p>

Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
<p>Focusing office development in the town centre (HX1);</p> <p>The retail hierarchy (HX1);</p> <p>Regeneration of areas (HX1);</p> <p>New development supporting the town centre (HX2);</p>	<p>The extent to which access is improved (and therefore an efficient use of land) dependent on the layout of schemes (HX3);</p> <p>Impact of all other area based policies dependent on the specific nature of sites (B1, B2, E1, E2, NS1);</p>	

Impacts on SA15: To reduce the amount of waste produced

- 12.111** Since 'living within environmental limits' forms one of the principles of sustainable development (**SO1**), there should be a positive impact on the SA objective, while another positive impact was predicted by addressing the causes of climate change (**SO2**) by reducing greenhouse gas emissions which would necessarily involve a reduction in the amounts of waste ending up in landfill. The assessment of the economy and enterprise objective (**SO3**) focused on the continuing need to consider waste as a resource and not a by product; it was considered uncertain at present as to whether there would be a positive impact on the SA objective. The housing objective (**SO4**) refers to the use of sustainable construction methods which should include reducing the consumption of materials and resources; therefore it will support the SA objective, as could the recycling of brownfield land. The transport objective (**SO7**) was suggested to have an uncertain impact, although it was pointed out that access to recycling facilities could be classed as both a waste and transport issue. The promotion of the efficient use and recycling of minerals (**SO9**) should make a positive impact on reducing the levels of mineral related waste. Comments against the waste objective (**SO10**) predicted a positive impact, as planning for sufficient waste facilities in sustainable locations implies that there will be good access to recycling and other forms of waste treatment facilities. Managing waste as a resource will make a further positive contribution.
- 12.112** There should be a positive impact as a result of the spatial option (**CP1**), concentrating development in and around the main urban areas where the majority of existing waste facilities are located should ensure that access is maintained to recycling sites. The policy also refers to the provision of infrastructure which should include waste infrastructure. Reducing the amount of waste produced involves creating employment opportunities to work in the waste sector, therefore planning for sufficient employment floorspace (**CP2**) should bring benefits to the SA objective. An increase in population and households (**CP4**) is likely to result in an increase in the amounts of waste produced, however if sufficient space is allocated in the design of housing to accommodate waste storage and segregation to increase recycling and recovery levels there could be a positive impact. The potential impact of the Bradford Calderdale Municipal Waste facility which will divert the residual waste from landfill is considered as a significant factor as well.
- 12.113** The same positive assessment is recorded against the sustainable development policies (**CP5 and CP6**), as against the related strategic objective. This is due to the principles of sustainable development including a reduction in waste as well as mitigating the impacts of climate change, which includes reducing the levels of waste ending up in landfill, as well as the use of sustainable construction methods. The inclusion of criteria referring to sustainable design and construction as well as the generation of renewable and low carbon energy in the

climate change core policy (**CP7**) should support the SA objective. There are no significant links with the locations for sustainable growth policy (**CP8**), although there is a priority given to brownfield land which is a form of recycling. The high quality, inclusive design policy (**CP12**) is suggested to have an uncertain impact, the main area where it could make a positive contribution would be the need to consider how to accommodate waste storage and segregation areas. Sustainable design and construction methods (**CP13**) should, by their very nature make a positive contribution to the SA objective, especially the elements of the SA objective that include the reduced consumption of materials and resources. Although there is no specific reference to waste infrastructure, the policy on infrastructure provision (**CP14**) makes clear that any future Community Infrastructure Levy (CIL) will be used to support the delivery of strategic infrastructure, which includes waste infrastructure.

- 12.114** The approaches to dealing with waste and treating it as a resource are such that facilities are more likely to be located on industrial or employment sites as opposed to landfill sites, which were often former mineral sites; therefore by providing (**TPE1**) and safeguarding (**TPE2**) sufficient employment land and premises for future need, there should be a positive impact. The changing way in which commercial and industrial waste is being dealt with along with the associated emerging technologies could potentially see businesses diversifying into treating or managing their own waste (**TPE3**), although the overall impact is at present recorded as being uncertain. There would be few if any impacts as a result of the general town centre principles expressed in **TPE6**, although when specific proposals are assessed, waste facilities and storage need to be considered in the context of amenity. There could be a positive impact resulting from the hot food take aways policy (**TPE8**), the reference to avoiding the creation of any 'unacceptable environmental, safety or other problems' could be argued to make a positive impact on the SA objective, as hot food take aways often increase the amount of street litter in towns; however it depends on people's approach to disposing of waste as well.
- 12.115** By making sure places are properly connected (**TPT1**), a positive impact was recorded, as it should ensure that waste facilities within the borough are accessible, and realistically at present the existing facilities can only be accessed by road. There was an uncertain impact arising from the sustainable travel policy (**TPT2**). The comments recorded suggested that it was unclear as to how sustainable travel modes could be adopted for the movement and disposal of waste; there are examples of refuse vehicles being powered by bio diesel, although this is beyond the remit of the Local Plan. It was also unclear as to how realistic it was to explore the potential to transport waste by rail freight both within Calderdale and to locations elsewhere.
- 12.116** By encouraging the processing of secondary and recycled aggregates the minerals strategy policy (**TPM1**) has a positive impact, as will the requirements for new or extended mineral sites to evidence how they will minimise waste during the extraction. The safeguarding of potential mineral resources was suggested to have a potential benefit on the SA objective, by avoiding the sterilisation of a potential resource, although the extent to which it would actually support the objective was uncertain. The application of the waste hierarchy as expressed in **TPW1** would fully support the waste SA objective, not only in terms of how waste is dealt with, but also in terms of how non waste development would make a contribution. Similarly, provision of sufficient waste facilities (**TPW2**) that help divert waste from landfill will have a positive impact, as will the focus within the urban areas and existing sites. The assessment of the policy that would deal with proposals for waste facilities (**TPW3**) recorded a positive impact, as it would help deliver appropriate facilities without giving rise to unacceptable impacts on people or the environment. There was an uncertain impact reported against the community health and education policy (**TPC1**), the only link between the SA objective and the policy was seen as the reference to hot food take aways, and therefore the same assessment was applied as was the case with policy TPE8.

- 12.117** The impacts from increased housing (**TPH1**) were recorded as uncertain; while increased

housing would inevitably increase the levels of waste produced, if facilities are in place to increase recycling and recovery levels then there was no reason why there should be an adverse impact on the SA objective. Again by prioritising brownfield land there is another element of support concerning a reduction in the consumption of resources (land being classed as a resource). There would be a limited impact if any at all resulting from the residential density policy (**TPH3**); however, it was important to recognise that space is needed for householders to sort and segregate their waste; high density development could have an impact on how this is achieved. High quality housing (**TPH4**) should be assumed to incorporate such areas into the design, therefore a positive impact is recorded. As was the case with some of the other housing policies, allocating land for temporary housing (**TPH7**) should ensure there is sufficient space for the sorting and segregating of waste.

12

Sustainability Appraisal 2012 Calderdale MBC

12.118 Ensuring that the quantity of water resources is protected (**TPF2**) should help to reduce the levels of water wasted, and the renewable and low carbon energy policy (**TPRE1**) supports the reduced consumption of resources. There could be additional benefits if the policy delivers energy from waste facilities.

12.119 There was a general assessment recorded against all the area based policies, which reflected the fact that waste is a strategic matter, and therefore the core and thematic policies will have a much greater impact than the area based policies. Additional comments were however submitted against the Halifax (**HX1, HX3**), Brighouse (**B1 and B2**), and Elland (**E1 and E2**) policies. All these made reference to the provision of infrastructure which would necessarily include waste infrastructure, especially where significant amounts of development are proposed. Overall though, it was considered that the impacts were uncertain.

Table 12.14 Summary of impacts on SA15: To reduce the amount of waste produced

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Living within environmental limits (SO1); Reducing the levels of waste disposed of in landfill (SO2); Sustainable construction methods (SO4); Development on brownfield land (SO4); Efficient use and recycling of minerals (SO9); Good access to recycling and other waste treatment facilities (SO10);	Need to consider waste as a resource (SO3); Impact from transport objective (SO7);	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Concentrating development in and around the main urban areas (CP1); Provision of infrastructure (CP1); Increasing opportunities for work within the waste sector (CP2); Considering waste as a resource (CP5, CP6); Use of sustainable construction methods (CP5,CP6,CP7, CP13);	Increase in population and households likely to increase waste levels (CP4); Need to consider how to design waste storage and segregation areas in developments (CP4, CP12); Dependent on infrastructure delivered (CP14);	

Generation of renewable and low carbon energy (CP7); Priority given to developing brownfield land (CP8);		
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
Provision of employment land and premises (TPE1); Safeguarding existing employment land (TPE2); Avoiding unacceptable environmental problems (TPE8); Accessible waste facilities (TPT1); Encouraging the processing of secondary and recycled aggregates (TPM1); Minimising mineral waste (TPM1); Application of the waste hierarchy (TPW1); Provision of sufficient waste facilities to divert waste from landfill (TPW2); Delivery of appropriate facilities while avoiding unacceptable impacts on people or the environment (TPW3); Priority given to developing brownfield land (TPH1); High quality housing (TPH4); Allocating specific sites for temporary housing (TPH7); Protection of water resources (TPF2); Generation of renewable and low carbon energy (TPRE1);	Diversifying the economy (TPE3); Need to consider how to design waste storage and segregation areas in developments (TPE6, TPH3) Limited opportunities for sustainable freight transport (TPT2); Extent of impact from mineral safeguarding policy unclear (TPM2); Impacts from increased levels of housing reduced by sufficient recycling facilities (TPH1);	
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
Waste is a strategic matter and therefore area based policies unlikely to have a significant impact, though reference to infrastructure should consider waste infrastructure;	Waste is a strategic matter and therefore area based policies unlikely to have a significant impact, though reference to infrastructure should consider waste infrastructure;	Waste is a strategic matter and therefore area based policies unlikely to have a significant impact, though reference to infrastructure

		should consider waste infrastructure;
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Impacts on SA16: To provide good employment opportunities for all and SA17: To achieve business success, sustainable economic growth, and continued investment.

- 12.120** The impacts from the sustainable development (**SO1**) and climate change (**SO2**) strategic objectives were considered uncertain, although sustainable development was felt to be potentially positive over the long term. The economy and enterprise objective (**SO3**) was recorded as having a mainly positive impact over the long term, whilst the objective concerned with housing was assessed as having a positive impact. Delivery and enhancement of existing green infrastructure and the natural environment (**SO5**) will be positive, again over the longer term, as would securing the objective related to the historic environment and design (**SO6**). Traffic congestion, particularly on major routes into and through the borough, will have a negative impact on local businesses and their ability to maintain and grow new employment opportunities; therefore unless **SO7** is achieved, this would have a negative impact on both the SA objectives. Working to ensure that health and prosperity increase among all communities in Calderdale (**SO8**) will have a positive impact, although this is likely to involve a long term process.
- 12.121** The Core policies were considered to result in a range of impacts. The spatial option policy (**CP1**) was considered to be positive, but again over the longer term. In relation to the employment floorspace requirements (**CP2**), the ability to support improvement in delivery of allocated employment land throughout the plan period was important. Ensuring access to funding for remediation costs and market demand are important factors that overlay the quality of sites allocated in the Local Plan; overall the policy was considered to be positive over the longer term. The provision of town centre floorspace (**CP3**) was recorded as being positive over the medium to long term, and the allocation of housing (**CP4**) was seen as being positive, but again this would be long term.
- 12.122** Both the sustainable development policies (**CP5** and **CP6**) were assessed as having positive impacts on the SA objectives through the lifetime of the plan, though the climate change policy's (**CP7**) positive impacts would be likely to emerge over the long term, and would be uncertain in the short to medium term; this was also the case with the policy on the extent of the Green Belt (**CP9**). In identifying sustainable locations for growth (**CP8**), the positive impacts would be experienced in the medium to long term. The restrictions set out in the policy on development in the Green Belt (**CP10**) were suggested to have an initial uncertain impact, but this was suggested to become positive over the long term. The Area Around Todmorden policy (**CP11**) was considered to have an uncertain impact on both the SA objectives, and the policy concerned with high quality, inclusive design (**CP12**) was suggested as having a mainly uncertain impact, if any at all. Remaining with design, the sustainable design and construction policy (**CP13**) was recorded as having a positive impact over the medium to long term. The assessment against infrastructure provision (**CP14**) stated that it was hard to assess since it was unknown as to how long public sector spending restrictions and the economic recession will impact investment in infrastructure over the plan period.
- 12.123** Concerning the thematic policies and the economic topics, there was concern that the Local Plan will significantly and positively affect the quality and availability of employment land, although the policy that addresses this issue (**TPE1**) was not considered as having a negative impact, instead it was suggested to be uncertain. Similarly, the assessment against the policy on safeguarding existing employment sites (**TPE2**) expressed concerns that the current RCUDP policy E5 has been ineffective in safeguarding good quality employment sites and that the policy is too easily circumvented. In diversifying the economy (**TPE3**) the local plan

was considered to be flexible enough to support diversification of the economy away from manufacturing and labour intensive businesses to knowledge rich and creative sectors. The assessment of the impacts on the SA objectives resulting from the approach to retail policy and the town centre hierarchy principle (**TPE4, TPE5, TPE6 and TPE7**) was generally supportive and considered there would be a positive impact. There was positive impacts predicted from the policy on cultural provision (**TPE9**).

- 12.124** In terms of the transport related policies, the impacts from **TPT1** were considered uncertain. This was due to the fact that the assessment repeated the concerns expressed against the strategic transport objective, in that congestion has a negative impact on businesses, and their ability to maintain and grow new employment opportunities. The sustainable travel policy (**TPT2**) was recorded as having an uncertain impact on the SA objective, as was the policy that deals with transport requirements for site allocations and development proposals (**TPT3**). Although there were no specific comments against either the minerals or waste policies, both these industries provide vital employment within the borough and therefore could have an impact on the SA objective. Of the other thematic policies, there were comments made against the renewable and low carbon policy (**TPRE1**). It was recorded as having a positive impact in the medium to long term against both SA objectives, due to the importance of the policy and the ability of the local plan overall to support increasing investment over the plan period of low carbon technologies and to exploit the economic opportunities arising from this.
- 12.125** In relation to the area based policies, there was a generally supportive assessment, due to the approach to area based policies as set out in the objectives and policies. There were no actual specific comments to make as the balance between larger and smaller areas were considered realistic and appropriate.

Table 12.15 Summary of impacts on SA16: To provide good employment opportunities for all and SA17: To achieve business success sustainable economic growth, and continued investment

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Sustainable development in the long term (SO1); Economy and enterprise objective positive in the long term (SO3); Meeting the housing objective (SO4); Delivery of and enhancing existing green infrastructure would bring economic benefits (SO5); Securing the protection and enhancement of the historic environment and design of development (SO6); Ensuring that health and prosperity increase likely to have positive impacts in the long term (SO8);	Sustainable development in the short to medium term (SO1); Climate change adaptation and mitigation measures (SO2); Unless the transport objective is achieved there will be a negative impact on the local economy (SO7);	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X
Spatial option positive in the long term (CP1);	Policy on development in the Area Around Todmorden (CP11);	

<p>Ability to support improvement in delivery of allocated employment land (CP2);</p> <p>Provision of town centre floorspace (CP3);</p> <p>Allocation of land for housing (CP4);</p> <p>Sustainable development policies (CP5 and CP6);</p> <p>Climate change adaptation and mitigation measures likely to be positive over the long term (CP7);</p> <p>Green belt policy impacts likely to be positive over the long term (CP9);</p> <p>Identifying sustainable locations for growth (CP8);</p> <p>Restriction on development in the Green Belt positive over the long term (CP10);</p> <p>Sustainable design and construction methods (CP13);</p>	<p>Limited impact from high quality inclusive design (CP12);</p> <p>Unable to establish impacts due to uncertainties over spending restrictions (CP14);</p>	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
<p>Policy considered flexible enough to support diversification of the economy (TPE3);</p> <p>Positive impacts should result from town centre and retail based policies (TPE4, TPE5, TPE6, TPE7);</p> <p>Enhancing and protection of cultural provision (TPE9);</p> <p>Positive impact in the medium to long term from the generation of renewable and low carbon energy (TPRE1);</p> <p>Exploit economic opportunities arising from low carbon technologies (TPRE1);</p>	<p>Uncertain impact over quality and availability of employment land (TPE1);</p> <p>Concern over policy on safeguarding employment sites being circumvented (TPE2);</p> <p>Need to reduce congestion and it's negative impact on business (TPT1);</p> <p>Extent of impacts from sustainable transport (TPT2);</p> <p>Transport requirements for allocations and proposals (TPT3);</p>	
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
<p>Generally supportive of the area based policies due to the approach set out in the policies.</p>	<p>Generally supportive of the area based policies due to the approach set out in the policies.</p>	<p>Generally supportive of the area based policies due to the approach set out in the policies.</p>

Impacts on SA 18: Enhance the viability and vitality of the town centres

- 12.126** It was considered that strategic objective **SO1** would have a positive impact on the SA objective; access to services and facilities are just one aspect of sustainable locations, therefore new development should support the town centres. Securing climate change adaptation and mitigation measures (**SO2**) can help reduce running costs for businesses, and therefore could help support the SA objective. Similarly, ensuring flood risk is taken account of when developing in town centres can help avoid significant negative impacts on people and property. Part of a sustainable economy would include the enhancement and protection of town centres, and therefore a positive impact was recorded against **SO3**. In terms of the housing objective (**SO4**), it was considered that delivery of housing would not only support current town centre businesses, but also encourage new ones to set up.
- 12.127** Positive impacts were predicted as a result of the historic environment and design objective (**SO6**), as maintaining and enhancing the historic environment and design across the town centres will ensure attractive retail, residential and business environments are protected and enhanced. The impacts recorded against the transport objective (**SO7**) were a mixture of uncertain and positive outcomes; a balance needs to be struck between improving access to and from town centres and the protection of an attractive pedestrian environment, as too much traffic can result in a negative experience for residents and visitors alike. If however, the core strategy objective is achieved, there would be a positive impact on the SA objective. Improving peoples health and well being (**SO8**) should have a positive impact on the districts main town centres, whilst having a sufficient number of waste management facilities (**SO10**) should help keep the town centres tidy, although this would also depend on people and businesses taking responsibility for their waste as well.
- 12.128** By focusing development in and around the existing main urban locations the spatial option policy (**CP1**) should support existing retailers and other town centre businesses. Additional development may also help to attract new town centre businesses to begin trading. As with a number of other economic based SA objectives there is unlikely to be a strong positive impact in the short term due to the current economic conditions. Identifying employment sites in the town centres (**CP2**) is predicted to have a positive impact, especially over the medium to long term. As would be expected, there was positive support for the SA objective as a result of the provision of town centre floorspace policy (**CP3**); this was due to the focus on retail provision in the town centres, which could help both existing businesses (who may be looking for larger or more modern premises) as well as attract new ones. As was the case with the related strategic objective (SO4), additional housing development (**CP4**) should help support existing town centre businesses as well as attracting investment. Both the sustainable development core policies (**CP5 and CP6**) were predicted to have positive impacts, in particular the assessment reported that the criteria in CP6 cut across a number of topics that would support the SA objective, including adapting to and mitigating the impacts of climate change, delivery of mixed use developments in accessible locations (implying town centres), securing design that reflects the local character, sustainably designed and constructed development, as well as reducing waste.
- 12.129** The climate change policy (**CP7**) was recorded as having a positive impact over the medium to long term by locating development in areas such as town centres, securing energy efficient, sustainably designed development, and minimising flood risk. Policy **CP8** implies that town centres are an example of sustainable locations and therefore would support the SA objective, while the Green Belt extent policy (**CP9**) is suggested to provide a framework that helps deliver additional development in appropriate locations (including town centres). Similarly the policy that addresses development in the Green Belt (**CP10**) and in the Area Around Todmorden (**CP11**) could help ensure that town centres remain the focus for certain types of development. High quality, inclusive design (**CP12**) should reinforce the existing local built heritage within the town centres and therefore support the SA objective, and development secured by **CP13**

should help to reduce running costs for businesses, as well as creating attractive urban environments. The impact from the infrastructure provision policy (**CP14**) is recorded as being uncertain, as it is dependent on what types of infrastructure are delivered.

- 12.130** The policy on providing employment land and premises (**TPE1**) makes reference to supporting development in Halifax town centre and the other town centres as per the retail hierarchy policy (**TPE4**) and therefore is predicted to have a positive impact on the SA objective. It could be argued that by protecting employment sites (**TPE2**) - and in doing so helping to protect existing and potential jobs - then incomes can be maintained and possibly enhanced, which could have a knock on effect on spending in town centres, overall though the impact was considered uncertain, as was the case with diversifying the economy (**TPE3**). The Calderdale retail hierarchy policy (**TPE4**) aims to maintain and strengthen town centres by ensuring they remain the focus for retail development, therefore it is recorded as having a strong positive impact on the SA objective. Like policy **TPE4**, the retail impact assessments and local thresholds policy (**TPE5**) is predicted to have a positive impact, as it provides support for the town centres in the borough, safeguarding the defined primary shopping areas through an impact assessment for proposals outside of these, which includes an assessment of the impact on the borough's markets. In requiring new town centre development (**TPE6**) to aim to increase the range of attractions, improve accessibility, and enhance the amenity, there should be a positive outcome against the SA objective. There was no significant impact one way or the other predicted from the retail based policy (**TPE7**), as this was concerned with small scale provision outside the town centres. The policy on Hot Food Takeaways (**TPE8**) refers to protecting the amenity of the area, and also the need to comply with the shopping frontage policy, and was therefore assumed to support the SA objective, whilst the cultural provision policy (**TPE9**) was considered to have a positive impact. Enhancing town centres is not solely concerned with retail provision, increasing cultural provision is an important aspect of ensuring their vitality and viability.
- 12.131** Positive impacts on town centres are expected from the improvements to public transport, reducing congestion, and improving opportunities for walking and cycling (**TPT1 and TPT2**); all of which should help improve access to and from the town centres, although this is likely to happen over the medium to long term. Part of the transport requirements for new developments (**TPT3**) refers to ensuring access to Halifax and or Brighouse, which should have a positive impact on these town centres, but the impact on other town centres is uncertain.
- 12.132** By requiring all new development to be consistent with the objectives of the waste hierarchy the sustainable waste management policy (**TPW1**) will support the SA objective as town centres with low levels of litter are more likely to attract visitors and new businesses; there should be another positive impact as a result of the policy requiring development to incorporate appropriate waste storage and segregation areas. A positive impact was suggested as a result of locating new community facilities in and around town centres (**TPC1**), which will add to the mix of uses. The assessment of the policy concerned with the allocation of land for housing (**TPH1**) recorded a positive impact, as additional development, provided there is good access to and from the town centres, should help support existing town centre businesses as well as attract new ones. In requiring development on non allocated sites (**TPH2**) to be in a sustainable location it is assumed that there would be a positive impact on the SA objective.
- 12.133** In directing new development away from flood risk zones 2 and 3 policy **TPF1** should help reduce the risk of flooding to existing or future businesses in the town centres, while green infrastructure policies (**TPNE1, TPNE2, TPNE3 and TPNE4**) such as open space can help make town centres more attractive to residents, businesses and visitors alike. Generation of on site renewable and low carbon energy (**TPRE1**) should help reduce running costs, if it does then it will help existing businesses and residents and attract new town centre businesses. As was the case with the assessment of the historic environment policies in the RI&O, the assessment against (**TPHE1**) reported that the Piece Hall is considered key to the development

132 Stage C: Sustainability Appraisal of the Core Strategy Preferred Options

12

Calderdale MBC Sustainability Appraisal 2012

of Halifax as a more major retail centre as is the support of independent retailers to keep the town distinctive rather than cloned and to improve the local economy to sustain both retailers, the local supply chain and employment. By maintaining and enhancing the historic environment across the borough's town centres attractive retail environments will be protected and enhanced. The historic environment is often used to promote towns and cities would help increase visitor numbers.

12.134 The additional levels of development identified in **HX1** will help make a positive impact on the SA objective in relation to Halifax, as the increase in population should help support the existing Halifax town centre businesses as well as support the creation of new enterprises. By providing support for development that enhances the vitality and viability of Halifax town centre, through addressing a number of different town centre uses across the different town centre quarters there is a positive impact predicted as a result of implementing **HX2**. The North Halifax policy (**HX3**) refers to improving connections to Halifax town centre and therefore is recorded as having a positive impact.

12.135 Both the Brighouse (**B1 and B2**) and Elland (**E1 and E2**) policies are recorded as having positive impacts, as the additional level of development identified along with a framework for delivering it should support both the town centres. Although there is support for small scale retail that meets a local need, there is a limited impact resulting from the Northowram and Shelf area policy (**NS1**). The Sowerby Bridge area policy (**SB1**) emphasises a focus on the town centre for office and light industry, a small amount of additional retail, reducing congestion in the town centre, promoting the tourism offer, alongside a number of measures to enhance the town centre; therefore a positive impact is predicted as a result. Both the Ryburn Valley (**RV1**) and Luddenden Dean, Mytholmroyd and Cragg Vale area policies (**LM1**) were reported as having an uncertain impact on the major town centres, although there is reference to meeting local retail needs. The Hebden Bridge (**HB1**) and Todmorden (**TOD1**) area policies emphasise development is required to maintain and strengthen the defined centres, therefore they are both expected to have a positive impact.

Table 12.16 Summary of impacts on SA 18: Enhance the viability and vitality of the town centres

Core Strategy Strategic Objectives		
Positive +	Uncertain ?	Negative X
Access to services and facilities (SO1); Energy efficient development can help reduce running costs for businesses (SO2); Taking account of flood risk can avoid significant negative impacts on people and property (SO2); Enhancement and protection of town centres (SO3); Delivery of additional housing (SO4); Maintaining and enhancing the historic environment (SO6); Achieving a sustainable safe and efficient transport system (SO7); Improving people's health and well being (SO8); Sufficient number of waste facilities (SO10);	Balance needs striking between improving access to and from town centres by car and pedestrian environments (SO7);	
Core Strategy Core Policies		
Positive +	Uncertain ?	Negative X

<p>Focusing development in and around the main urban centres (CP1);</p> <p>Additional development may attract new businesses (CP1);</p> <p>Provision of employment sites in town centres (CP2);</p> <p>Providing town centre floorspace (CP3);</p> <p>Additional residential development (CP4);</p> <p>Delivering sustainable development should have a positive impact on town centres (CP5, CP6);</p> <p>Adapting and mitigating the impacts of climate change (CP6, CP7);</p> <p>Mixed use developments in accessible locations (CP6);</p> <p>Securing design that reflects local character (CP6);</p> <p>Reducing waste from development (CP6);</p> <p>Development in sustainable locations (CP8);</p> <p>Focus on the urban areas for development (CP9, CP10, CP11);</p> <p>High quality inclusive design (CP12);</p> <p>Reduced running costs for businesses and attractive urban environments (CP13);</p>	<p>Dependent on the types of infrastructure delivered (CP14);</p>	
Core Strategy Thematic Policies		
Positive +	Uncertain ?	Negative X
<p>Support for development in Halifax and other town centres (TPE1, TPE4);</p> <p>Ensuring town centres remain the focus for retail development (TPE4);</p> <p>Requirements for retail proposals outside of town centres to undergo an impact assessment (TPE5);</p> <p>Increasing the range of attractions, improving access, and enhancing amenity (TPE6);</p> <p>Restricting the impacts of Hot Food Takeaways (TPE8);</p> <p>Increasing cultural provision (TPE9);</p> <p>Improvements to public transport, walking and cycling routes, reducing congestion (TPT1, TPT2);</p> <p>Transport requirements for site allocations and development proposals (TPT3);</p> <p>Consistency with waste hierarchy (TPW1);</p> <p>Locating new community facilities in and around town centres (TPC1);</p> <p>Additional residential development (TPH1, TPH2);</p> <p>Reducing the risk of flooding (TPF1);</p> <p>Enhancing and protecting open space (TPNE1, TPNE2, TPNE3, TPNE4);</p>	<p>Protecting employment sites links to the protection of incomes and the knock on effect on town centre spending (TPE2);</p> <p>Diversification of the economy (TPE3);</p> <p>Impact on town centres other than Halifax and Brighouse from transport requirements for site allocations and development proposals (TPT3);</p>	

<p>Reduced running costs for businesses through renewable and low carbon energy generation (TPRE1);</p> <p>Piece Hall key to the development of Halifax as a major retail centre as is the support of independent retailers (TPHE1);</p>		
Core Strategy Area Based Policies		
Positive +	Uncertain ?	Negative X
<p>Additional development Increase in population should help support the town centre (HX1, B1,B2,E1,E2);</p> <p>Providing support for development that enhances the vitality and viability of Halifax town centre through development of different types in different quarters (HX2);</p> <p>Improving connections to and from North Halifax (HX3);</p> <p>Focus on town centre locations for office and light industry development (SB1);</p> <p>Reducing congestion and promoting the tourism offer (SB1);</p> <p>Encouraging development to maintain and strengthen the defined centre (HB1, TOD1)</p>	<p>Limited impact from the Northowram and Shelf (NS1), Ryburn valley (RV1), and Luddenden Dean, Mytholmroyd and Cragg Vale (LM1) area policies;</p>	

13 Monitoring

- 13.1** As part of the ongoing process the SA involves, a monitoring framework will be established in order to feed in to the Local Plan's Annual Monitoring Report (AMR). The monitoring framework will be established following the response to the preferred options consultation, although it is likely to be based on the indicators and targets expressed in the SA Framework, and the Monitoring Framework proposed in the Core Strategy Preferred Options consultation document, which is in section 27 of that document.