

NORTHLEACH WITH EASTINGTON

NEIGHBOURHOOD PLAN

2016 – 2031



DRAFT SUSTAINABILITY APPRAISAL REPORT (INCORPORATING STRATEGIC ENVIRONMENTAL ASSESSMENT)

Published by Northleach with Eastington Town Council under the EU Directive 2001/42 on Strategic Environmental Assessment and the Environmental Assessment of Plans & Programmes Regulations 2004 to accompany the publication of the Northleach with Eastington Pre-Submission Neighbourhood Plan

January 2018

NON-TECHNICAL SUMMARY

1. The purpose of this report is to provide an assessment of any significant sustainability effects resulting from the policies and proposals of the Pre-Submission version of the Northleach with Eastington Neighbourhood Plan. The Neighbourhood Plan has been published for consultation by the Town Council.

2. From the outset, the Town Council agreed with the local planning authority, Cotswold District Council, that preparing a Sustainability Appraisal would be an effective means by which it could be shown that the Plan contributes to the achievement of sustainable development. This is one of the basic conditions that the Neighbourhood Plan must meet, in order to be made. The Draft Sustainability Appraisal report now provides an assessment of the draft policies of the Neighbourhood Plan in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The framework of appraisal objectives takes into account the comments made on the scoping report by the statutory consultees.

3. The Neighbourhood Plan contains a number of policies for the use and development of the land, focused entirely within that part of the wider Parish that is the town of Northleach. The plan period coincides with the emerging Local Plan, April 2016 – March 2031. It is expected that the Local Plan will be examined and adopted prior to the examination of the Neighbourhood Plan and therefore its policies have been used as its strategic policy framework. The Parish is relatively isolated in the wider rural area, and so there are no other development plan proposals and no other Neighbourhood Plans in the vicinity that may raise issues of cumulative or in-combination effects. Besides, as will be explained later, the Neighbourhood Plan is not allocating land for housing, retail or employment development.

4. The evidence base shows that the key sustainability issues in town are heritage (many listed buildings and most of the town located within a Conservation Area), landscape (the town lies within the Cotswold AONB), flooding (parts of the town lie within flood zones 2/3) and access to services. The result is a settlement that is, and has been for many years, constrained in its growth and change by a series of environmental designations.

5. There are approx. 2,000 residents occupying approx. 900 homes in the town. The age profile of the town is older than the average for towns, the economically active population is smaller than average, with higher than average use of the car for commuting trips. Public transport services are generally poor and there is no rail station within 14 miles of the town. There is a primary school, doctor's surgery, nursing home, fire station, community centre, hotel, pubs, café/restaurants, post office/general store, other shops/personal services, museum, AONB visitor centre and sports facilities. There are two small industrial estates. Since the opening of the new A40 in 1984, the town has lost its secondary school, hospital, banks and petrol station.

6. The sustainability objectives are as follows:

- Objective 1 – Community Facilities
- Objective 2 – Affordable Homes
- Objective 3 – Heritage
- Objective 4 – Landscape & Biodiversity
- Objective 5 – Flood Risk
- Objective 6 – Employment
- Objective 7 – Town Centre

7. The objectives were selected from the larger number included in the Local Plan Sustainability Appraisal. At the time of the scoping report in 2015 it was intended that the Neighbourhood Plan would propose site allocations. The objectives were considered to be the most relevant to enable a proper assessment of sustainability issues in this area and at this scale. Some others – renewable energy for example – were not considered helpful to the analysis as it was not possible nor necessary to understand the effects of the Plan in that regard.

8. It is a reflection of the difficult challenges facing neighbourhood planning in the District that this range of objectives, if not the Appraisal as a whole, is now somewhat superfluous, given the narrowing of the Plan objectives and draft policies. With the Local Plan having taken responsibility for planning for the modest housing growth in the town, and with the District Council discouraging any additional proposals for housing or economic development in the Neighbourhood Plan, the remaining policies are modest in their scope and effect. However, having embarked on this exercise, the Town Council has not sought to abandon it at this late stage.

9. The assessment indicates that the proposals of the Pre-Submission Plan will have a number of positive effects and a small number of likely or possible negative effects. The potential for significant negative effects has been avoided through site selection and policy wording and the utilisation of other development plan policies when the details of a planning application are being considered. In some cases – notably policies NE1 and NE2 – the positive social and economic effects are assessed as greater than the minor negative landscape and/or heritage effects, which can be mitigated through detailed scheme design in due course. A number of reasonable alternatives to the policies have been assessed but none appear to lead to better sustainability outcomes, marginal though the differences are in most cases.

1.2 The Neighbourhood Plan has been published for consultation by the Town Council in line with the Neighbourhood Planning Regulations 2012. From the outset, the Town Council agreed with the local planning authority, Cotswold District Council, that preparing a Sustainability Appraisal (as opposed to a narrower Strategic Environmental Assessment (SEA)) would be an effective means by which it could be shown that the Plan contributes to the achievement of sustainable development. This is one of the basic conditions that the Neighbourhood Plan must meet, in order to be made.

1.3 In which case, the District Council determined that a screening opinion (see Stage A in Table A below) was not necessary and the Town Council moved straight to preparing and consulting the statutory bodies on the scope of the Appraisal (under the Environmental Assessment of Plans & Programmes Regulations 2004). A copy of the scoping report and of the State of the Parish (both of October 2014) report is available on the Town Council's website and will be circulated with this Draft Sustainability Appraisal.

1.4 The Appraisal report provides an assessment of the draft policies of the Neighbourhood Plan in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The framework of appraisal objectives takes into account the comments made on the scoping report by the statutory consultees.

2. Background to Sustainability Appraisal

2.1 Through the Sustainability Appraisal are tested the social, environmental and economic effects of the Neighbourhood Plan to ensure that they promote sustainable development and the Plan avoids causing any significant environmental effects.

2.2 The combined process involves a simple evaluation of the social, economic and environmental impacts of the plan as follows:

- An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- The social, economic and environmental characteristics of areas likely to be significantly affected
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
- The environmental protection objectives, established at international, community or national levels, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation
- The likely significant effects on the local economy, society and the environment
- The Measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan
- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
- A description of measures envisaged concerning monitoring

2.3 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan in a relatively small rural area. A summary of the process, as derived from the Planning Practice Guidance Flowchart of 2015 (ID 11-033), is contained in Table 1 below.

The Sustainability Appraisal Process (incorporating SEA)	
Screening	<p>STAGE A: This stage is undertaken by the local planning authority to determine whether the neighbourhood plan is likely to have significant environmental effects.</p> <p>If it considers there is the potential for such effects then it issues an opinion to that effect. If it does not consider there is potential for such effects, then it must consult the statutory consultees - Natural England, Historic England and the Environment Agency – before issuing its final screening opinion.</p> <p>The qualifying body may choose to undertake an Appraisal without obtaining a screening opinion.</p>
Scoping	<p>STAGE B: This stage sets the context of the assessment by identifying the baseline data and establishing the scope of the assessment.</p> <ol style="list-style-type: none"> 1. Identification of relevant plans, policies and programmes. Any existing requirements that need to be taken into account or incorporated into the plan are identified. 2. Review of baseline information. Data about environmental, social and economic issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation. 3. Identification of Sustainability Issues. The review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan. 4. Development of the SA/SEA Framework. The assessment criteria used to assess the impact of the plan or programme. 5. Identification of initial plan options. Taking into account best practice initial identification of options and reasonable alternatives undertaken. 6. Consultation. On the scope and alternatives for assessment it is necessary to consult statutory consultees.
Assessment	<p>STAGE C: This stage involves the assessment of any likely significant effects of the plan policies (and any reasonable alternatives) on the key sustainability issues identified.</p> <ol style="list-style-type: none"> 1. Finalisation of the Plan options and alternatives for testing 2. Testing the Plan Objectives against the SA/SEA Framework. The Plan Objectives are tested to ensure compliance sustainability principles 3. Evaluation of plan options and alternatives. The SA/SEA Framework is used to assess various plan options by identifying the potential sustainability effects of the plan and assist in the refinement of the policies. 4. Predicting and evaluating the effects of the plan. To predict the significant effects of the plan and assist in the refinement of the policies. 5. Consideration of ways to mitigate adverse effects and maximise beneficial effects. To ensure that all potential mitigation measures and measures for maximising beneficial effects that are identified. 6. Proposing measures to monitor the significant effects of implementing the Plan: To detail the means by which the sustainability performance of the plan can be assessed and monitored. <p>This assessment is used to feed into the development of a plan or programme to help ensure the most sustainable option is selected. The SA/SEA framework is also used to assess the sustainability implications of the draft policies and the results used to inform policy development.</p>

Reporting	<p>STAGE D: Preparation of the SA/SEA Report</p> <ul style="list-style-type: none"> The findings of the assessment together with how it has influenced the development of the plan are identified and set out in a draft environmental report together with the recommendations on how to prevent, reduce, or offset any significant negative impacts arising from the plan. <p>STAGE E: Consultation – seek representations from consultation bodies and the general public</p> <ul style="list-style-type: none"> This is an ongoing process. Consultation of the draft SA/SEA Report is undertaken into account and used to influence further iterations of the sustainability appraisal process.
Adoption and Monitoring	<p>STAGE F: Following adoption of the Plan, the significant effects of implementing the plan are measured and any adverse effects are responded to. The results are fed into the future plans and sustainability appraisals.</p>

Table A: Sustainability Appraisal Process

2.4 Since the Scoping Stage B was completed, the focus has been on policy choice and formation. As discussed in Sections 8 and 9, in some cases there have been some alternative policy approaches to assess using the framework of sustainability objectives. In others, the policies have been compared with a 'policy off' alternative. This has been an iterative process, with the result that the final draft policies reflect a more modest ambition than those tested with the District Council in 2016.

3. Neighbourhood Plan Objectives & Other Programmes

3.1 The Neighbourhood Plan contains a number of policies for the use and development of the land, focused entirely within that part of the wider Parish that is the town of Northleach. The plan period coincides with the emerging Local Plan, April 2016 – March 2031. It is expected that the Local Plan will be examined and adopted prior to the examination of the Neighbourhood Plan and therefore its policies have been used as its strategic policy framework.

3.2 The Neighbourhood Plan policies, together with the policies of the Local Plan and the National Planning Policy Framework (NPPF) will be used by the District Council to help determine planning applications once the Neighbourhood Plan is made in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the emerging Local Plan.

3.3 The vision of the Neighbourhood Plan for the Parish of Northleach with Eastington is:

“Northleach has become a thriving market town providing a wider range of services for its local community and the wider rural area. Its population has grown as the housing needs of local people have been met and working age people have been drawn to live and work here. There are more jobs as new business units and town centre shops have started up and are sustained by local and tourist trade. The growth of the town has not been met to the coast of its special historic character. There have been a number of small housing schemes on the edge of the town that have been set within a new ‘green ring’ of footpaths, parkland, plan areas and woodland that now surrounds the town”.

3.4 To achieve this vision, the Neighbourhood Plan has focused on achieving four key objectives, as follows:

- Sustain the significance of the town's heritage assets and its AONB location by planning for development that is sympathetic to the scale, topography and character of the town and its beautiful landscape setting
- Strengthen the vitality and viability of the town centre by protecting the range of its retail and other commercial activities and by managing public car parking more successfully
- Improve the attractiveness of the town to tourists and visitors by improving existing facilities and infrastructure
- Sustain the effectiveness of the town's community facilities to continue to serve the town and its surrounding settlements

3.5 The National Planning Policy framework (NPPF) published by the Government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The Plan must demonstrate that it is consistent with the provisions of the NPPF. The following paragraphs of the NPPF are especially relevant to the NENP:

- Supporting a prosperous rural economy (§28)
- Securing good design (§58 etc)
- Promoting healthy communities and education (§70 etc)
- Protecting local green spaces (§76 etc)

- Conserving and enhancing the natural environment (§109 etc)
- Conserving and enhancing the historic environment (§126 etc)

3.6 The Neighbourhood Plan must also be able to show that its policies are in general conformity with the strategic policies of the development plan, which currently comprises saved policies of the Cotswold District Local Plan 2001 – 2011, of the Gloucestershire Minerals Local Plan 1997 – 2006 and of the Gloucestershire Waste Core Strategy 2012 - 2027. Although the first two documents are in the process of being replaced, it is not expected that either will have been adopted before the examination and referendum of the Plan. The Core Strategy remains up-to-date.

3.7 In which case, its policies have regard to the relevant saved policies of the adopted plans and are informed by the relevant strategies, policies and evidence base of the new plans, i.e. the Cotswold District Local Plan to 2031 and the Gloucestershire Minerals Local Plan to 2030. The new Local Plan is at its examination stage. The new Minerals Local Plan is currently being prepared for consultation. Both plans are therefore expected to be adopted within the next year.

The Cotswold District Local Plan 2016 - 2031

3.8 In June 2016, the District Council published its Submission Draft Local Plan 2016 – 2031. It proposes planning policies to support the Local Plan's development strategy and which will replace the saved policies of the current Local Plan. Their policies provide part of the framework, within which the general conformity of the Neighbourhood Plan with the development plan will be assessed.

3.9 The District Council has proposed (in December 2016) to make some 'focused changes' to its proposals. It does not propose any changes to Northleach-specific policies, though some other changes provide some clarifications which are supportive of proposals in the Neighbourhood Plan.

3.10 Policy DS1 (Development Strategy) continues to define as a 'Principal Settlement'. Policy SA2 requires housing site allocations in Northleach to accommodate at least 22 new homes, but no new employment or retail land or floorspace is required. Policy S12 of the Plan establishes a detailed policy for the town of Northleach (see below), which includes two proposed allocations and a series of employment and tourism proposals. In practice, therefore, the Local Plan achieves much of what might otherwise have been determined by the Neighbourhood Plan.

Policy S12

NORTHLEACH

Housing

Allocated housing development sites:

- N_13B Land north west of Hammond Drive and Midwinter Road (5 dwellings); and
- N_14B Land adjoining East End and Nostle Road (17 dwellings).

Employment

Protected existing employment sites:

- Old Coalyard Farm Industrial Estate (EES35); and
- the Old Brewery (EES36).

The following tourism initiatives are supported in principle:

- the development of the new discovery centre at the Old Prison;
- improvements to the Market Place; and
- the establishment of a small visitors' car park.

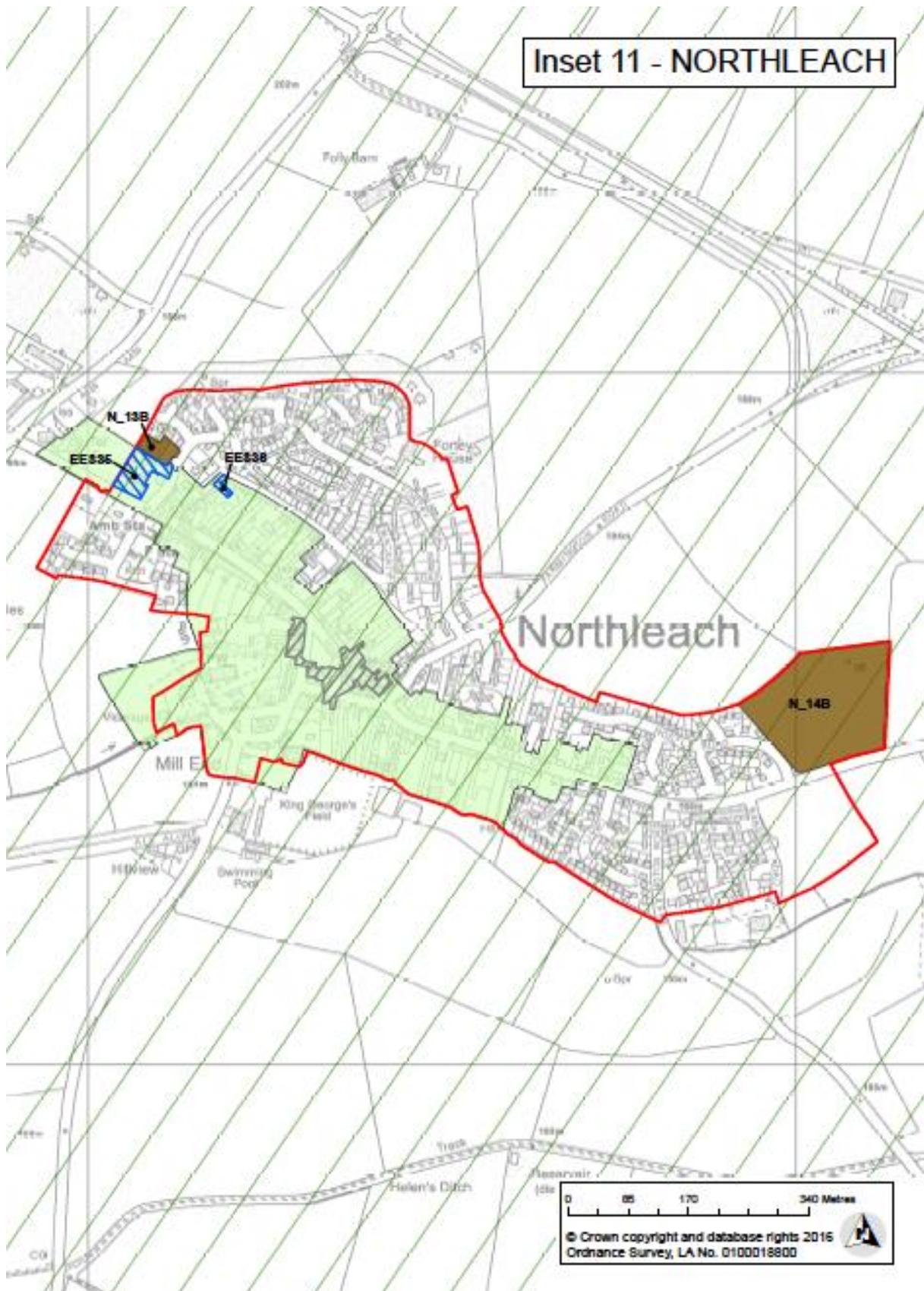
Infrastructure

Once contributions to delivery of infrastructure required in the Mid Cotswolds Sub Area (Policy SA2) have been made, development proposals will, subject to viability, be expected to help deliver or make appropriate contributions towards:

- a. suitable land for allotments

3.11 Other policies of some relevance include:

- Policies DS2 & DS3: Development Boundaries – to update the current defined development boundaries with the same intent
- Policy EC7: Retail Hierarchy – defining Northleach as a 'Local Centre'
- Policy EC8: Main Town Centre Uses
- Policies EC10 & EC11: Tourism
- Policy D1: Design
- Policy EN1: Natural & Historic Environment
- Policies EN2, EN3 & EN4: Landscape (inc the AONB)
- Policies EN8 & EN10: Heritage Assets
- Policy INF2: Social and Community Infrastructure



Plan B: Local Plan 2016 – 2031: Northleach Policies Map Extract

3.12 The Parish is relatively isolated in the wider rural area, and so there are no other development plan proposals and no other Neighbourhood Plans in the vicinity that may raise issues of cumulative or in-combination effects. Besides, as will be explained later, the Neighbourhood Plan is not allocating land for housing, retail or employment development.

4. Local Sustainability Issues

4.1 The evidence base shows that the key sustainability issues in town are heritage (many listed buildings and most of the town located within a Conservation Area), landscape (the town lies within the Cotswold AONB), flooding (parts of the town lie within flood zones 2/3) and access to services. The result is a settlement that is, and has been for many years, constrained in its growth and change by a series of environmental designations.

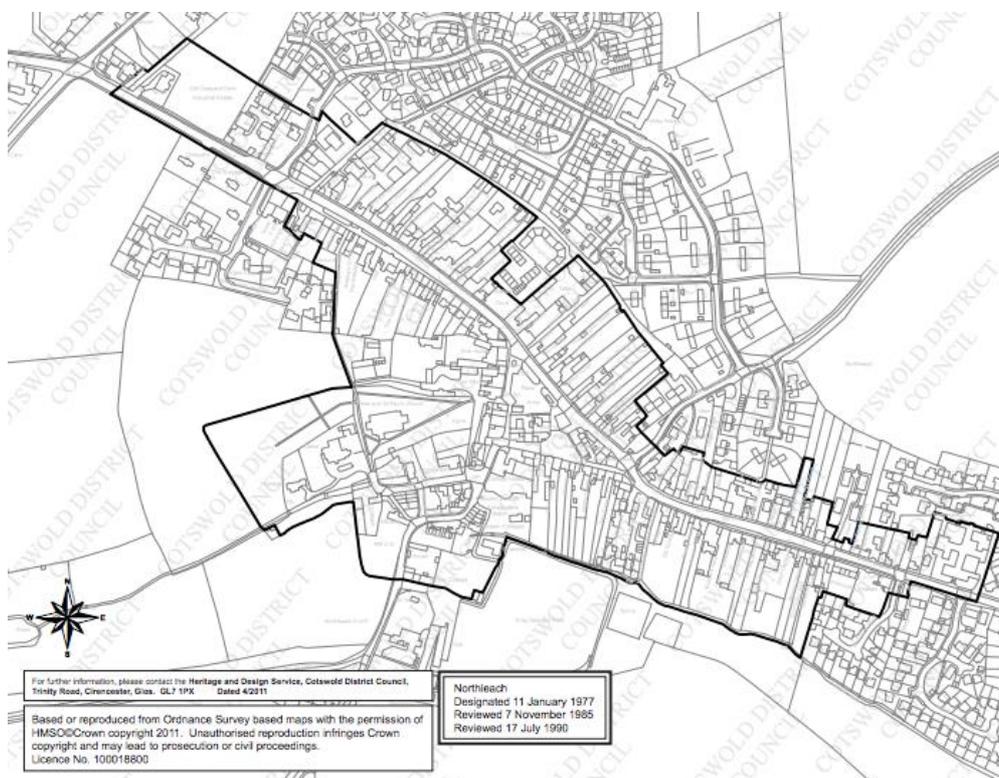
4.2 The positive effect has been to ensure there have been no significant development within or on the edge of the town for some time, until the recent housing scheme at East End, which will be supplemented by the District Council's proposed allocation. Together, they will add some 50+ new homes to the housing stock of the town (an increase of about 6% over this 20 year period). The town enjoys a very high heritage quality, nestled within the AONB landscape.

4.3 The negative effect has been a long and slow decline, in population (which has also aged markedly from 2001 to 2011), in the number of shops and range of public services. The town remains a popular tourist attraction, but there are relatively few businesses to claim more than a limited proportion of this potential spending power. There are now no significant employers in the town and so its economically active population commute to the large number of cities and towns that are accessible on the A40/A429 axis that passes just to the north of the town. A much higher than average number use their car/van, which reflects the poor public transport services for this purpose. However, despite those negative effects, a large majority of local people would prefer no further development to that committed and planned.

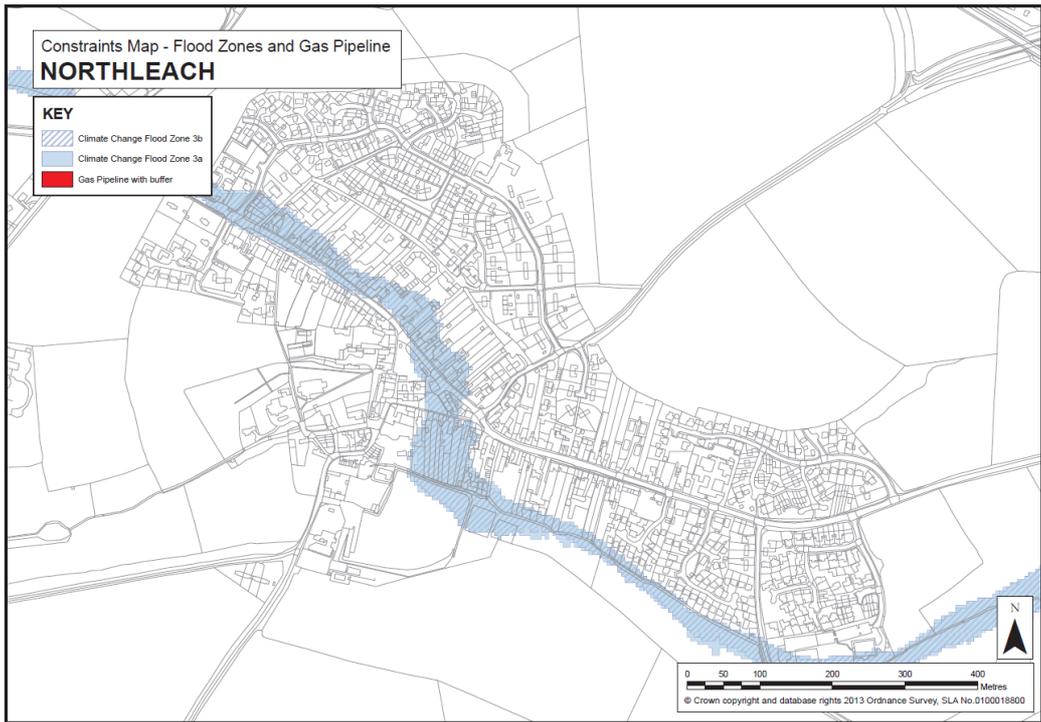
5. Sustainability Characteristics

5.1 A summary of the baseline information is contained in the separate 'State of the Parish' report, which is published as part of the evidence base for the Plan. The report notes the following main sustainability characteristics:

- The Parish lies within the Cotswold Area of Outstanding Natural Beauty
- The Northleach Conservation Area, which was designated in 1977 (and since reviewed) covers much of the town and all of the town centre (see Plan C below)
- There are 96 listed buildings, including the Grade I church, with a number of other heritage assets of local value
- Part of the town lies in Flood Zone 3 (see Plan D below)
- There are approx. 2,000 residents occupying approx. 900 homes in the town
- The age profile of the town is older than the average for towns, the economically active population is smaller than average, with higher than average use of the car for commuting trips
- Public transport services are generally poor and there is no rail station within 14 miles of the town
- There is a primary school, doctor's surgery, nursing home, fire station, community centre, hotel, pubs, café/restaurants, post office/general store, other shops/personal services, museum, AONB visitor centre and sports facilities
- There are two small industrial estates
- Since the opening of the new A40 in 1984, the town has lost its secondary school, hospital, banks and petrol station



Plan C: Northleach Conservation Area



Plan D: Flood Risk in Northleach

6. Assessment Framework of Sustainability Objectives

6.1 The sustainability objectives are as follows:

Objective 1 – Community Facilities

To improve access to services and leisure/cultural facilities (including play, recreation in open spaces, parks and the countryside)

- Will the Plan enable existing facilities to be protected and new ones created?

Objective 2 – Affordable Homes

To provide an adequate supply of open market and affordable homes of different types to meet local needs

- Will the Plan contribute to meeting district and local open market housing need?
- Will the Plan contribute to meeting the needs of local people for affordable housing?

Objective 3 – Heritage

To preserve and enhance the quality of built environment and heritage of the town

- Will the Plan sustain and enhance the significance of designated heritage assets?
- Will the Plan sustain and enhance the significance of non-designated heritage assets?

Objective 4 – Landscape & Biodiversity

Ensure that the natural environment surrounding the town is conserved and enhanced, biodiversity is improved and designated habitats are protected

- Does the Plan justify the exceptional circumstances for development in the Cotswold AONB?
- Will the Plan deliver a net biodiversity gain?
- Will the Plan avoid development in a designated habitat site?

Objective 5 – Flood Risk

To reduce flood risk resulting from new developments

- Will the Plan avoid development in an area of defined flood risk (i.e. EA flood zone 2 or 3)?

Objective 6 – Employment

To create opportunities for the town's residents to find employment locally

- Will the Plan provide for new employment land for businesses suited to an AONB location?
- Will the Plan improve the competitiveness of existing employment land?

Objective 7 – Town Centre

To improve the vitality and viability of the town as a local service centre

- Will the Plan enable existing town centre retailers and other services to thrive?
- Will the Plan enable new town centre floorspace and/or uses?

6.2 The objectives were selected from the larger number included in the Local Plan Sustainability Appraisal. At the time of the scoping report in 2015 it was intended that the Neighbourhood Plan would propose site allocations. The objectives were considered to be the most relevant to enable a proper assessment of sustainability issues in this area and at this scale. Some others – renewable energy for example – were not considered helpful to the analysis as it was not possible nor necessary to understand the effects of the Plan in that regard.

6.3 It is a reflection of the difficult challenges facing neighbourhood planning in the District that this range of objectives, if not the Appraisal as a whole, is now somewhat superfluous, given the narrowing of the Plan objectives and draft policies. With the Local Plan having taken responsibility for planning for the modest housing growth in the town, and with the District Council discouraging any additional proposals for housing or economic development in the Neighbourhood Plan, the remaining policies are modest in their scope and effect. However, having embarked on this exercise, the Town Council has not sought to abandon it at this late stage.

7. Assessment of the Neighbourhood Plan Strategic Objectives

7.1 A summary of the assessment of the four Neighbourhood Plan objectives against the four SEA objectives is provided in Table B below. A simple 'scoring' system is used to show positive (+), neutral (0) or negative (-) effects. Where the effect is uncertain or dependent on other factors, then (?) is used and an explanation is provided in the text below.

Neighbourhood Plan Objectives	SEA Objectives						
	Community Facilities	Affordable Homes	Heritage	Landscape & Biodiversity	Flood Risk	Employment	Town Centre
Heritage & AONB	0/-?	0	+	+	0	0	+/-?
Town Centre	0	0	+/-?	0	0/-?	+	+
Tourism	0	0	+/-?	0/-?	0/-?	+	+
Community Facilities	+	0	+/-?	0/-?	0	+	0

Table B: Assessment of Neighbourhood Plan Objectives

Community Facilities

7.2 There is a strong correlation between the two sets of objectives seeking to protect and improve community facilities. However, there is the potential for a tension between this objective and the desire of the plan to protect the AONB and heritage character of the area through poorly located or designed proposals to improve community facilities.

Heritage

7.3 There is a strong correlation between the two sets of objectives seeking to protect the heritage of the area and its AONB landscape. However, there is the potential for positive or negative effects in promoting commercial reuse in the town centre (which lies at the heart of the Conservation Area and contains many listed buildings) and tourism more generally. Improving community facilities may also affect the setting of the Conservation Area. These tensions are resolved through careful policy wording and effective development management.

Landscape & Biodiversity

7.4 There is a positive relationship between this objective and the Plan objective for protecting the AONB. There is, however, the potential for negative landscape and biodiversity effects in planning for tourism development, if on the edge of the town or in the countryside, and in improving community facilities, as noted above.

Flood Risk

7.5 The main area of flood risk in the town coincides with the town centre. There is therefore the potential for negative flood risk effects with proposals to improve the town centre and tourism facilities there. This can be avoided or mitigated through the location of development and policy wording.

Town Centre

7.6 There is a positive relationship between this objective and the Plan objective for the town centre. There is also the potential for positive effects in tourism development, as the town centre is the focus of that activity. As noted, there is the potential for negative heritage effects on the one hand, but also for positive effects in maintained beneficial uses in older buildings to aid their ongoing maintenance and repair.

Employment

7.7 The plan objectives for promoting the town centre, tourism and improved community facilities all have the potential to sustain and improve the small levels of employment in the town.

Affordable Homes

7.8 There are no effects on this objective.

8. Assessment of the Neighbourhood Plan Policies

8.1 The Neighbourhood Plan contains seven proposed policies in pursuit of its strategic objectives. In Table B below these policies are assessed against each of the SEA objectives. Again, the information sets out the potential for positive (+), neutral (0) and negative (-) effects.

Neighbourhood Plan Policies		SEA Objectives						
		Community Facilities	Affordable Homes	Heritage	Landscape & Biodiversity	Flood Risk	Employment	Town Centre
NE1	Public Car Park at West End	0	0	0/-	-	0/-	0	+
NE2	Primary School Expansion	+	0	0	-	0	+	0
NE3	Northleach Conservation Area	0	0	+	0	0	0	+/-?
NE4	General Design Principles	0	0	+	0	0	0	0
NE5	Town Centre	0	0	+	0	0	+	+
NE6	Tourism Development	0	0	+	0/-?	0	0	+
NE7	Local Green Spaces	0	0	0	+	0	0	0

Table C: Assessment of Proposed Neighbourhood Plan Policies

Community Facilities

8.2 Policy NE2 supports the expansion of the primary school to enable a more effective operation of the site, most especially to rationalise the existing arrangement of school buildings and to alleviate the problems of on-street car parking. This will have a positive effect on this objective. The effects across all the other objectives are assessed as neutral.

Heritage

8.3 A number of policies are intended to have positive heritage effects. Policies NE3 and NE 4 on the Conservation Area and Design will ensure that the quality of development proposals must be of a high standard if they are to be approved. Policies NE5 and NE6 both encourage town centre and tourism development but require the details of proposals to have full regard to the heritage constraints in the town centre and at the Old Prison site.

8.4 The Policy NE1 Public Car Park land lies within the Conservation Area and there are two listed buildings in the adjoining Old Coalyard. The use of the land for this purpose will not compromise the essential open character of the space in maintaining a visual separation between the main town edge (formed by the Old Coalyard buildings) and the cluster of buildings at the junction of West End with the A429. The land makes no contribution to defining the significance of the listed buildings in the Old Coalyard. It is not expected that there will be any need for permanent built structures associated with the car park. The effect is therefore assessed as minor on the objective of sustaining the character of heritage assets – in this case the Conservation Area.

8.5 The Policy NE2 Primary School land lies within a short distance of the Conservation Area but makes no contribution to defining the significance of its setting in this location. A combination of the topography and vegetation results in the land not being visible in views into the Area in the valley from the higher ground to the south. It will therefore have a neutral effect.

Flood Risk

8.6 There ought to be no significant negative effects on flooding of the policies. Parts of the Policy NE3 Conservation Area land lie within a flood risk zone, but the policy focuses on design matters. The same is true of Policy NE4, and both policies assume that the flood risk policies of the Local Plan will manage any risks. Policy NE5 Town Centre focuses on managing changes of use that will not have any flood risk effects. The Policy NE1 Public Car Park land lies within a flood risk zone, and therefore has a negative effect on this objective. But this use is not considered as inappropriate within a flood risk area and the policy requires the use of permeable surfacing. The location is the most suited to this proposal in all other respects.

Landscape & Biodiversity

8.7 The land in Policies NE1 and NE2 lies outside the defined development boundary of the town and within the AONB. Its development will have a negative effect on the AONB as a matter of principle. However, the public car park will not fundamentally undermine the open gap between the town and the A429, as it will contain no permanent buildings or structures of any significance.

8.8 The primary school land lies above the school but buildings will be barely visible above the ridge height of the existing main school building in views from the town into the AONB and they will not breach the 180m AOD contour or ridge line. The effect of this minor development scheme would therefore be less than significant, with the precise orientation and building heights of a proposal capable of mitigating this even further.

8.9 There is the potential for negative landscape effects of Policy NE6, depending on the location of the proposal, but other design and landscape policies of the development plan ought to ensure that this potential is not realised. The Local Green Spaces of Policy NE7 will have a positive effect on this objective by protecting two parts of the AONB that surround the town.

Town Centre

8.10 Policy NE5 will have a number of economic benefits in sustaining and creating jobs and in providing convenient local services. Policy NE6 will also encourage tourism for economic benefits, alongside other policies of the Plan. The individual and collective special heritage value of the commercial and other buildings in the town centre will be managed by other development plan policies and so is not repeated in this policy, and hence this will avoid any negative heritage effects. It may even be possible to secure heritage benefits in maintaining historic buildings in productive commercial use.

8.11 Policy NE1 is expressly intended to remove some parking from the Market Square to make it a more attractive and functional public space. This will improve the vitality of the town centre, to help achieve job growth. Policy NE3 Conservation Area should be neutral, although has the potential for positive and negative effects on the town centre if it either discourages commercial proposals or encourages unsuitable schemes.

Employment

8.12 Policies NE2 Primary School and NE6 Town Centre should both enable the creation of new jobs in the town. The school is already the largest employer and its ability to expand on the site may increase the number of FTE jobs there. Increasing the amount of commercial floorspace in the town centre should also lead to new jobs.

Affordable Homes

8.13 There are no effects on this objective.

9. Assessment of Reasonable Policy Alternatives

9.1 The assessment is obliged to consider any reasonable alternatives to the proposed policies. In practice, the only alternative to all but two of the policies is that of having no policy (a 'Policy Off' position) and relying upon other development plan policies or national policy. The assessment considers that such an alternative would make no difference to the sustainability outcomes.

Neighbourhood Plan Policy Alternatives		SEA Objectives						
		Community Facilities	Affordable Homes	Heritage	Landscape & Biodiversity	Flood Risk	Employment	Town Centre
NE1	Public Car Park at the East End	0	0	0	-	0	-	-
	No Policy	0	0	0	0	0	-	-
NE2	Annex Site elsewhere in town	+/0?	0	0/-?	0/-?	0/-?	+	+/0?
	No Policy	-	0	0	0	0	-	0
NL3	No Policy	0	0	0/-?	0	0	0	0
NL4	No Policy	0	0	0/-?	0	0	0	0
NL5	No Policy	0	0	0/-?	0	0	0/-?	0/-?
NL6	No Policy	0	0	0	0	0	0/-?	0/-?
NL7	No Policy	0	0	0	0	0	0	0

Table D: Assessment of Neighbourhood Plan Policy Alternatives

9.2 If the location of Policy NE1 Public Car Park is at the end of East End (beyond the current town edge), then it would avoid the negative heritage and flood risk effects of the proposed location. However, the land is also in the AONB and so there will be the same negative landscape effect. It is also considered that the much longer walking distance to the town centre, and the fact that East End is not the main traffic entrance to the town, would mean that the car park would be ineffective, and thus the opportunity to deliver positive town centre and employment effects would be lost. The result of no policy would also be this lost opportunity. There are considered to be no other realistic sites around the edge of the town that are available for this use.

9.3 The alternative to Policy NE2 Primary School is using a different 'annex' site to grow the facilities. However, all the potential land around the town edge is similarly constrained and so has the potential for negative landscape, heritage and flood risk effects. In addition, an 'annex' will not resolve the current parking problems and is not likely to be operationally acceptable to the school. But, locating the annex in the town centre, if a suitable building was to be made available, may help improve its vitality and would maintain the employment benefit.

9.4 The effect of not having a policy on the Conservation Area (NE3) is generally neutral (as other development plan heritage policy would be used) but the loss of its specificity to this Conservation Area may lead to poorer quality schemes. The same can be said for not having a general design policy.

9.5 The absence of Policy NE5 Town Centre has the potential to have negative town centre, heritage and employment effects. Other development plan policies may discourage investment in the town centre, resulting in possible deterioration in the condition of heritage assets and fewer businesses and jobs. The absence of Policy NE6 Tourism may have the same outcome.

9.6 There are no positive or negative effects of not having a Local Green Space policy (NE7) and there are no effects on affordable housing.

10. Summary of the Assessment

10.1 The assessment indicates that the proposals of the Pre-Submission Plan will have a number of positive effects and a small number of likely or possible negative effects. The potential for significant negative effects has been avoided through site selection and policy wording and the utilisation of other development plan policies when the details of a planning application are being considered.

10.2 In some cases – notably policies NE1 and NE2 – the positive social and economic effects are assessed as greater than the minor negative landscape and/or heritage effects, which can be mitigated through detailed scheme design in due course.

10.3 A number of reasonable alternatives to the policies have been assessed but none appear to lead to better sustainability outcomes, marginal though the differences are in most cases.

10.4 A final view will be taken on this matter once the consultations on the Pre-Submission Plan and on this Draft SEA report are concluded.

11. Monitoring

11.1 The Neighbourhood Plan proposes that the progress in its implementation will be assessed using the measures for each objective set out in this report. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Town Council will endeavour to collect data on an annual basis to report on the progress of the plan. Should any real or potential negative impacts be identified then the Town and District Councils will seek to review the relevant policies and their implementation.