

# High Peak Local Plan Sustainability Appraisal Report



*Shaping the future*



High Peak Borough Council  
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# 1 Non Technical Summary

**1.1** A Non-Technical Summary of this June 2015 Addendum to the Sustainability Appraisal (SA) report of the submission version High Peak Local Plan has been prepared to provide an overview of the assessment undertaken in June 2015, in line with the requirements of the Strategic Environmental Assessment (SEA) Directive. This addendum is required to ensure that the potential social, environmental and economic effects of proposing a revised housing target and associated main modifications to the Local Plan are fully assessed for significant sustainability impacts and reported on as part of the plan making process.

## Context and legislation

**1.2** The full Sustainability Appraisal Report (August 2014) considers in detail the requirements of the SEA Directive as listed below, although these requirements are also considered as an integral part of the assessment in this Addendum.

1. Contents, main objectives of the Local Plan and relationship with other relevant plans and programmes.
2. The relevant aspects of the current state of the environment, and the likely evolution thereof without implementation of the Plan.
3. The environmental characteristics of the area.
4. Any existing environmental problems.

**1.3** The remaining requirements of the SEA Directive are detailed in turn below.

## Sustainability objectives

**1.4** The objectives used to assess the sustainability implications of the proposed revision to the housing target and associated Main Modifications are listed below. These were developed and refined as part of the Sustainability Appraisal Scoping process, preceding this Addendum report.

**Table 1 Summary of sustainability objectives**

	Theme	Sustainability Objective
1	Employment and economy	To support the development of a local economy that is balanced across employment sectors, including by the delivery of premises, sites and infrastructure needed for sustainable growth.
2	Employment and economy	To support the development of attractive, vibrant and distinctive town centres.
3	Employment and economy	To encourage tourism development and to promote the area as a tourist destination.
4	Air, noise and light pollution	To maintain good local air quality and to minimise noise and light pollution.
5	Biodiversity and green infrastructure	To protect and enhance SPAs, SACs, SSSIs and other designated wildlife sites.

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	Theme	Sustainability Objective
6	Biodiversity and green infrastructure	To protect and enhance biodiversity, geo-diversity and to support the development of linked green spaces.
7	Climate Change	To minimise energy use and to develop the area's renewable energy resource.
8	Townscape quality, historic and cultural heritage	To conserve and enhance town / village - scape quality, archaeological and heritage assets along with their settings.
9	Landscape Character and natural resources	To protect and enhance the character and appearance of the landscape, including cultural landscape assets, as well as the area's other natural assets and resources.
10	Water resources and flood risk	To ensure sustainable management of water resources and to minimise the risk of flooding.
11	Transport and accessibility	To reduce the number of journeys made by car - within, and to and from - the area.
12	Health and well-being	To improve health and reduce health inequalities.
13	Transport and accessibility	To improve access to jobs, services and facilities.
14	Community safety and neighbourhood quality	To protect and improve the safety and environmental quality of streets and neighbourhoods.
15	Homes for everyone	To provide everybody with the opportunity of owning (including by shared ownership) or renting, a sustainably designed, good quality home at an affordable cost.
16	Leisure and recreation	To improve opportunities for people to participate in cultural, leisure and recreational activities.

## Likely significant effects

**1.5** As part of the Sustainability Appraisal process, the Council is required to determine the likely significant effects of the proposed revision to the housing target and associated Main Modifications on the social, environmental and economic sustainability objectives.

**1.6** The table below provides a summary of the results of the assessments.

**Table 2 Summary of likely significant effects**

Issue	Likely significant effects
Revise housing target down from 360 new homes per year to 350 new homes per year.	A housing target of 350dpa is considered to offer most positive sustainability benefits compared with the other reasonable alternatives considered. In particular, positive effects were identified for economic development and provision of homes

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Issue	Likely significant effects
	for all. Through the published evidence base supporting the submitted Local Plan, the Council has demonstrated that there are sufficient sites to deliver this target, in locations where mitigation is possible to address any identified impacts on landscape character, purposes of the Green Belt, integrity of European designated sites and the setting of the Peak District National Park. The Council's evidence base also indicates that road traffic congestion arising from this level of new development can be accommodated.
Modification to Policy H3 to reduce housing capacity of site West of Tongue Lane, Fairfield, Buxton (site B8) [Policy DS16]	Positive effect on sustainability objective to maintain good local air quality and to minimise noise and light pollution. Loss of 76 homes during the plan period will have a minor negative impact on the objective for "homes for all" in the medium to long term, particularly in the context of a reduced range for objectively assessed need for housing. Other effects are very limited.
Modification to Policy H3 to remove housing site allocation at Woodhead Road, Glossop (sites G8, G9, G10 and G11) [Policy DS6]	Positive effects on both the sustainability objectives to conserve and enhance town / village - scape quality, archaeological and heritage assets along with their settings; and on the objective to protect and enhance the character and appearance of the landscape, including cultural landscape assets, as well as the area's other natural assets and resources. Loss of 121 homes will have only a minor negative impact on the objective of "homes for all", particularly in the context of a reduced range for objectively assessed need for housing. Other effects are very limited.
Modification to Policy S3 to remove the reference to the Cheshire East Local Plan accommodating 500 homes on behalf of High Peak.	Very limited effects. The proposed modification will not result in any increase in the overall level of growth in High Peak, nor in the proposed locations of new homes in the plan area.

## Mitigation measures

**1.7** Given the limited impact of the proposed Main Modifications on the sustainability objectives, no other mitigation measures have been proposed, aside from those already identified in section 13 of the full Sustainability Appraisal Report (August 2014) - examination library reference E11.

## Selection of alternatives

**1.8** The sustainability appraisal process requires the Council to consider alternative options, and to assess their sustainability implications.



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**1.9** The potential social, environmental and economic effects of three alternatives for a housing target have been assessed and compared, with the conclusions leading to one option being proposed for consultation.

**1.10** Alternatives considered in relation to the proposed Main Modifications have been taken to be the existing text or policy in the submitted Local Plan. As the Local Plan preparation process is now nearing completion, these alternatives have already been appraised and selected through the earlier Sustainability Appraisal process. The proposed Main Modifications as set out in Section 9 have all been selected as the most appropriate option to proceed with.

## **Monitoring**

**1.11** Detailed information regarding monitoring the sustainability effects of implementing the Local Plan is set out in section 12 of the full Sustainability Appraisal Report (August 2014). Overall however, the Council will continuously monitor the sustainability effects of Local Plan policies and report on the outcome of this through the Annual Monitoring Report.

## 2 Introduction

**2.1** The High Peak Local Plan was submitted to the Secretary of State for Communities and Local Government on 28<sup>th</sup> August 2014. The Secretary of State has appointed Mr Mike Moore BA (Hons) MRTPI CMILT MCIHT as Inspector for the Local Plan examination. The examination hearing sessions started on Tuesday 13 January 2015 and these sessions were closed on 5 February 2015.

**2.2** On 4<sup>th</sup> March 2015 the Inspector wrote to the Borough Council concerning the publication by the Department for Communities and Local Government of 2012-based sub national household projections (SNHP) on 27 February 2015. The publication of these projections was anticipated, and the potential procedural implications for the examination of the Local Plan had been discussed at the examination hearings.

**2.3** In his letter, the Inspector commented that the projections are the starting point estimate of overall housing need. The Inspector invited the Council to consider what implications, if any, the projections have for its assessment of objectively assessed housing needs. He further commented that the Council should then consider what implications, if any, this would have for the Local Plan and whether, in its view, any main modifications would be required as a result. The Inspector's letter of 4 March required the Council to seek the views of consultees on the Council's conclusions. He went on to say that depending on the nature of the Council's conclusions, and the response to them, it may be necessary to hold a further hearing.

**2.4** Following receipt of the Inspector's letter, the Borough Council asked consultants Nathaniel Lichfield and Partners (NLP) to undertake an assessment of the implications of the 2012-based SNHP on the Council's objectively assessed housing need (OAHN). A report of the consultants' findings was published on 8<sup>th</sup> May 2015, Examination Library reference U6.

**2.5** The housing target set out in the submission version Local Plan was informed by NLP's Strategic Housing Market Assessment (SHMA) and Housing Needs Report (April 2014) amongst other considerations. The Housing OAN range of 420 to 470 dwellings per annum (dpa) recommended in the April 2014 SHMA was based on the most up to date information available at the time. The May 2015 update to this study incorporated the new 2012-based household projections that are considerably lower than both the 2008-based and 2011-based household projections. The NLP Update report May 2015 concluded that, on the basis of the most recent evidence, a revised housing OAN range of between 310dpa and 350dpa is most appropriate for the plan area.

**2.6** Sustainability Appraisal has informed the process of identifying a housing target taking account of the Council's revised OAN range. As a consequence of the consultants' findings, the Borough Council has considered three reasonable alternatives for a housing target. These alternatives have been subject to sustainability appraisal along with Main Modifications to the plan required as a result of proposing a revised target and other matters raised in the Inspector's letter.

**2.7** The aim of this Addendum to the SA Report of the High Peak Local Plan is to present an appraisal of the "likely significant effects" associated with the three reasonable alternatives for a housing target, and any associated Main Modifications, with a view to informing the Council decision and subsequent consultation.

**2.8** As an SA Report Addendum, this report should be read alongside the full SA Report submitted with the High Peak Local Plan, Examination Library Reference E11.

## 2 Introduction



### Structure of this report

**2.9** The remainder of this Addendum Report is structured as follows:

- Section 3 - describes the methodology used to carry out the appraisals and consultation requirements.
- Section 4 - considers the impacts of three alternative options for a housing target on key sustainability issues.
- Section 5 - describes the nature of the likely equality impact of each of the alternative housing target options.
- Section 6 - summarises the findings of the sustainability appraisal and equalities impact assessments, with recommendations for selection and dismissal of options.
- Section 7 - considers the likely significant effects of proposed modifications to the Local Plan required as a result of proposing a revised housing target and other matters.
- Section 8- provides full appraisal matrices detailing the sustainability assessments undertaken of housing target alternatives.
- Section 9 - sets out the Main Modifications proposed as a result of a revised housing target and other matters and assesses whether additional appraisal is required.
- Section 10 provides appraisal matrices detailing the sustainability assessments undertaken of proposed Main Modifications.

## 3 Appraisal Methodology

**3.1** The appraisal methodology for this Addendum to the SA Report follows the methodology used for the appraisal of the submission version High Peak Local Plan and set out in section three of the full SA Report submitted with the High Peak Local Plan, Examination Library Reference E11.

**3.2** The appraisal framework consists of a list of 16 SA objectives which were identified through a scoping process (which included consultation). A review of context / baseline issues can also be found within the full SA Report.

### Appraisal of Housing Target Alternatives

**3.3** In line with the Regulations, the tables in section 8 of this report identify, describe and evaluate likely significant effects of the alternative housing target options considered, drawing on the framework of SA objectives established through scoping. Consideration is also given to the appraisal criteria listed in Schedule 2 of the Regulations, including short, medium and long term effects.

**3.4** The Housing Needs Study Update May 2015 has identified a number of scenarios presenting a wide range of housing need for the period 2012 to 2031, based on different indicators of what the need for housing in High Peak could be. These are summarised below:

- **Scenario A: Updated PopGroup Baseline:** This scenario represents a projection of the demographic shift based on current factors and recent trends in High Peak Borough fixing household growth to the 2012-based SNHP. It takes account of dwelling vacancy rates in order to derive a housing need figure from the projections in household growth.
- **Scenario Aa: Partial Catch-Up Headship Rates:** Using the 2012-based headship rates as a starting point, it is projected that by 2033 (starting after 2017 to allow for full economic recovery) headship rates for the younger adult age groups will have made up around half of the difference between the 2012 and 2008-based SNHP headship rates.
- **Scenario B: Natural Change:** In and out-migration is reduced to zero, hence growth is driven purely by natural change, or the interaction between births and deaths.
- **Scenario C: Zero Net Migration:** Whereby the annual international and domestic migration flows under the baseline scenario are equalised to result in a net migration of zero (i.e. an identical number of people move into the area as leave the Borough).
- **Scenario D: Short Term Migration Trends:** a scenario based on average gross flows of internal and international migration in High Peak over the five year period 2007/08 to 2011/12 as taken from the ONS Mid-Year Estimate Series, assuming High Peak will continue to see migration at a level in line with recent trends.
- **Scenario E: Long Term Migration Trends:** scenario as above, but using a ten year migration average, from 2001/02 to 2011/12, assuming High Peak will continue to see migration in line with levels achieved on average over the last decade.
- **Scenario F: Oxford Economics Job Growth:** A 'policy-off' trend scenario based upon Oxford Economics' local area-based econometric model. This provides potential unconstrained employment growth in High Peak (-309 jobs 2012 - 2031) over the Plan period.
- **Scenario Fa: Oxford Economics Job Growth + 5% Reduction in Out-Commuting:** This scenario applies the above job growth assumption (-309 jobs 2012 - 2031) whilst factoring in a 5% reduction in out-commuting over the plan period.

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- **Scenario G: Policy On Job Growth Target:** A 'Policy-On' trend scenario based upon the Council's realistic economic objectives whilst factoring in increased economic growth in the key sectors in line with the regional average. This provides unconstrained employment growth in High Peak of 469 jobs over the course of the plan period.
- **Scenario Ga: Policy On Job Growth Target + 5% Reduction in Out-Commuting:** This scenario applies the above job growth assumption (+469 jobs) whilst factoring in a 5% reduction in out-commuting over the plan period.
- **Scenario H: Job Stabilisation:** A scenario taking forward a net total of zero job growth over the period 2012 - 31 for the Borough.

**3.5** Scenarios B, C, D, E, Fa and Ga were not considered further by the Council on the basis that they produced targets that were lower than the baseline demographic projections considered the starting point for identifying objectively assessed need.

**3.6** Scenario F (Oxford Economics) and Scenario H (Job Stabilisation) both provide housing requirements within the identified OAN range (310 - 350). Scenario F produces a target of 313dpa and Scenario H produces a target of 328dpa. Both scenarios result in a decline in the working age population of High Peak.

**3.7** The scenarios pursued by the Council for further assessment on the basis of meeting demographic need, providing support for employment and the provision of affordable homes are as follows:

### **Scenario A: 2012 SNHP/2012 SNPP (2012 Baseline)**

**3.8** This scenario models the 2012-based SNHP and the 2012-based SNPP. The Practice Guidance states the latest household projections (2012-based) should be the starting point for any assessment of objectively assessed housing need. Under this scenario the population of High Peak is projected to increase by 6,911 to 2031. Over the period 2012 - 2031, the 2012 SNHP indicate average annual growth of 296 dpa. Allowing for a 5% uplift to account for worsening market signals and past under delivery results in a requirement of 311 dpa.

**3.9** The population growth arises primarily due to in-migration to High Peak Borough which accounts for over 70% of the increase (4,921 by 2031)<sup>(i)</sup>. Natural change (arising from more births than deaths) is positive to 2029, before becoming negative towards the latter years of the plan period. It is projected that the number of people aged over 75 in High Peak Borough will almost double by 2031. This ageing profile of the population indicates that, despite the population growth, there will be a reduction in the labour force, with the working age population declining by 4% by 2031.

**3.10** The target of 310 dpa is recommended as the lower end of the revised housing OAN range and is considered further in this report as a reasonable option for a revised housing target.

i High Peak Housing Needs Study 2012-based SNHP Update for High Peak Borough Council; May 2015; Nathaniel Lichfield & Partners

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### Scenario G: Policy On Job Growth

**3.11** This scenario represents an estimate of how High Peak's economy might be expected to perform in the future based on job creation policies set out in the Council's Employment Land Review that seek to increase growth in targeted industrial sectors in line with regional averages. This projection estimated that there could be a total (net additional) job growth of 469 between 2012 and 2031. To underpin this level of job growth there would need to be an increase in the population of 7,334 and an increase in dwellings of 6,682<sup>(ii)</sup>. This equates to an annual need of 352 dpa.

**3.12** The target of 350 dpa is recommended as the upper end of the revised housing OAN range and is considered further in this report as a reasonable option for a revised housing target.

### Scenario: Objectively Assessed Need using 2011-based SNPP with headship rates from 2011-based SNHP to 2021 and indexed thereafter

**3.13** The Strategic Housing Market Assessment and Housing Needs Study March 2014 (Nathaniel Lichfield & Partners) provided recommendations on objectively assessed need for the submission version of the Local Plan. The report identified a number of scenarios chosen to reflect the alternatives for future growth within the Borough and identified a dwelling requirement of between 420 dwellings per annum and 470 dpa that represented an appropriate range for High Peak, providing a level of housing delivery which would aid economic growth aspirations whilst meeting the full demographically assessed need for housing.

**3.14** The target of 420 dpa was confirmed at the Examination Hearing Sessions as the Council's Objectively Assessed Need based on the recommended range taking into account evidence available at the time and is thus considered further in this report as a reasonable option for a revised housing target.

### Appraisal of proposed modifications

**3.15** The Report to Council<sup>(iii)</sup> 11 June 2015 made recommendations for Main Modifications to the submitted version of the Local Plan proposed to reflect recommendations for a revised housing target and other matters raised in the Inspector's letter to the Council of 4 March 2015.

**3.16** These proposed modifications are set out in full in section 9 of this SA Addendum Report. The sustainability appraisal of the proposed Main Modifications has been undertaken in two stages. Firstly, each of the Main Modifications has been assessed to determine whether the modification has been appraised through earlier Sustainability Appraisal Reports and subsequently whether an additional appraisal is required. The results of this preliminary assessment are shown in section 9.

**3.17** Where it has been determined that an additional appraisal of the sustainability effects was required, the appraisal was undertaken as described previously (paragraphs 3.1 - 3.2 of this Addendum Report). In line with the Regulations, the tables in section 10 of this report identify,

ii High Peak Housing Needs Study 2012-based SNHP Update for High Peak Borough Council; May 2015; Nathaniel Lichfield & Partners

iii <http://www.highpeak.gov.uk/sites/default/files/meetings/papers/papers-1850464476/106.pdf>

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describe and evaluate likely significant effects of the Main Modifications proposed, drawing on the framework of SA objectives established through scoping. Again, consideration is given to the appraisal criteria listed in Schedule 2 of the Regulations, including short, medium and long term effects.

**3.18** In summary, the Main Modifications proposed are to:

- Modify Policy S3 (Strategic Housing Development) and supporting text to reflect a revised Local Plan housing requirement of 350dpa.
- Modify Policy S3 to remove the reference to the Cheshire East Local Plan accommodating 500 homes on behalf of High Peak.
- Modify Policy H3 (Housing Allocations) to remove the Woodhead Road, Glossop housing allocation and provide updated planning permission figures.

**3.19** Alternative approaches to these Main Modifications are considered in section 7 of this Addendum Report.

### Consultation

**3.20** At their meeting on 11<sup>th</sup> June 2015, the Council agreed the above modifications for consultation purposes, and a period of consultation follows as recommended by the Local Plan Inspector. It should be noted that the recommendation to approve for consultation the modification relating to the Woodhead Road site was made subject to further consideration by officers of the Mel Morris Conservation report<sup>(iv)</sup> relating to a Heritage Assessment of the allocation.

**3.21** The consultation takes place over four weeks commencing on 18<sup>th</sup> June and closing on 16<sup>th</sup> July 2015. As the consultation is considered by the Inspector as part of the ongoing Local Plan examination, responses will only be considered from individuals and organisations who submitted formal representations to the Local Plan upon its publication in 2014. The consultation will seek views on:

- The findings of the updated Housing Needs Study; the Woodhead Road Heritage and Landscape Appraisal and this SA Addendum Report.
- The proposed Main Modifications to the Local Plan regarding housing requirements and the Woodhead Road, Glossop housing allocation.
- The Council's interpretation of the implications of the Satnam Millennium Ltd and Warrington Borough Council High Court judgment for assessing housing requirements.

**3.22** It should be noted that the Council's stance on whether sites are removed or not may still be subject to change once the Council has had an opportunity to consider the consultation responses received.

**3.23** Upon the completion of the consultation, all responses will be submitted to the Local Plan Inspector who will consider them alongside existing representations and discussion at the examinations hearings held in January and February 2015.

iv High Peak Local Plan Land at Woodhead Road - Policy DS6 Heritage and Landscape Appraisal; June 2015; Mel Morris Conservation

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**3.24** Depending on the nature of the modifications and the responses to them, the Inspector has indicated that he may hold a further examination hearing to allow him to explore the matters further with examination participants.

## 4 Summary of Housing Target Options Appraisal

**4.1** This section considers the impacts of the three alternative options for a housing target on key sustainability issues and assesses the significance of the findings in the context of the wider objectives and priorities of the Council. The alternatives are:

- Scenario A: Option 1: 310dpa
- Scenario G: Option 2: 350dpa
- Scenario OAN confirmed January 2015: Option 3: 420dpa

### Impact on jobs and growth

**4.2** The Growth Plan<sup>(v)</sup> for the Borough prioritises overturning the forecast long-term fall in jobs in High Peak; maximising investment to support the private sector, affordable housing and to sustain public services; as well as making sure that High Peak fulfils its potential in the County and Greater Manchester sub-region. Taking these policies of the Council and adjusting the Oxford Economics economic forecasts accordingly, analysis for the Council by Nathaniel Lichfield & Partners (NLP)<sup>(vi)</sup> has shown a potential overall FTE job growth in all sectors in High Peak of 866 between 2011 and 2031.

#### **Option 1: 310 new homes per year**

**4.3** This option, representing the lower end of the revised OAN range, is below the housing target set out in the submission version Local Plan (360dpa).

**4.4** The SA has found a direct and negative impact on the SA objectives for economic development. The scenario indicates that at a target of 310 dpa, the Borough could expect a fall of 4% in the size of the labour force over the period 2012 - 2031 and a loss of 581 jobs over the same period<sup>(vii)</sup>. On this basis, the option would fail to provide support for the priorities outlined in the Council's Growth Plan.

#### **Option 2: 350 new homes per year**

**4.5** This option, representing the upper end of the revised OAN range, is for assessment purposes, broadly equivalent to the housing target set out in the submission version Local Plan (360dpa).

**4.6** The SA has found a direct and positive impact on the SA objectives for economic development. The scenario indicates that at a target of 350 dpa, the Borough could expect a fall of just 1% in the size of the labour force over the period 2012 - 2031 and a net increase of 469 jobs over the same period. This option provides support for the potential job growth set out in the Council's Employment Land Review and is in line with the Council's Growth Plan.

#### **Option 3: 420 new homes per year**

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- v Growth Plan for High Peak; High Peak Borough Council; Regeneration Select Committee 6 November 2013
  - vi Employment Land Requirement Study: High Peak Employment Land Review Demand Update; July 2014; Nathaniel Lichfield & Partners
  - vii High Peak Housing Needs Study 2012-based SNHP Update; May 2015; Nathaniel Lichfield & Partners

## 4 Summary of Housing Target Options Appraisal

**4.7** This option is higher than the upper end of the May 2015 recommended OAN range (350dpa) and was the Council's OAHN as agreed at the Examination Hearings of the Local Plan. It is considered to be a reasonable alternative as there are sites before the Inspector, not currently allocated in the Local Plan (omission sites), that taken together with allocations made in the submission plan, have the potential to deliver the target. However the Council has put evidence to the Inspector concerning the unsuitability of the omission sites for inclusion in the Local Plan. The reasons for the Council's view of unsuitability include inappropriate development in the Green Belt, significant harm to landscape or setting of the National Park and likely significant effects on the integrity of European designated sites. Of the omission sites, around 500 homes have been proposed on sites in Chapel-en-le-Frith which is the subject of a Neighbourhood Plan due to go to referendum on 16 July. None of these omission sites are included within the Neighbourhood Plan as housing allocations.

**4.8** The SA has found a directly positive impact on the SA objectives for economic development. Whilst the Housing Needs Update May 2015 did not consider a scenario that gave rise to an annual development rate above 352dpa, it may be assumed that if the market could deliver a rate of 420dpa there would be an increase in the working age population to underpin job growth and support the Council's Growth Plan.

### Impact on affordable housing need

**4.9** Paragraph 47 of the National Planning Policy Framework (NPPF) notes that housing need has two components (market and affordable housing) and paragraphs 14 and 47 of the Framework require that local planning authorities meet both elements in full, unless they lack the sustainable capacity to do so. The 2014 High Peak SHMA<sup>(viii)</sup> provides a detailed analysis of affordable housing need in High Peak. The report identifies a need for 878 (net) affordable homes annually over the next five years across the Borough. Delivering 878 affordable dwellings per annum at a rate of 30% overall would indicate a requirement of 2,927dpa. Whilst the market cannot be expected to deliver such a requirement, it suggests there is a need to provide market housing over and above the demographically projected need, in order to help meet the affordable need.

**4.10** Failure to meet the full housing need of the plan area risks overcrowding in the private and social housing stock. Poor housing impacts directly on residents' mental and physical health as well as on their educational attainment. Housing affordability also has implications for the economic performance of the area, as the lack of affordable housing is one of the drivers of the out-migration of young, economically active residents.

### **Option 1: 310 new homes per year**

**4.11** The SA has found this option to have the least significant positive impact on the SA objective of homes for all as it does not adjust housing supply above demographic-led projections, failing to take into account household's ability to pay. On this basis, of the alternatives considered, the option would make the lowest contribution to improving affordability and to stabilising increasing house prices. The indirect impacts of this are anticipated to include continued risk of overcrowding in the private and social housing stock (with associated physical and mental health costs) and a continued loss of young economically active residents (including key workers) out of the Borough.

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viii Strategic Housing Market Assessment and Housing Needs Study; April 2014; Nathaniel Lichfield & Partners

## 4 Summary of Housing Target Options Appraisal

### **Option 2: 350 new homes per year**

**4.12** Given that this option is the upper end of the range for objectively assessed need (May 2015) the SA has found this option to have a directly and significantly positive impact on the SA objective of homes for all. Meeting this target will go further than option 1 towards addressing the needs of an ageing population and meeting assessed affordable housing need. This will have positive impacts on addressing the issue of affordability, the need to reduce the housing waiting list and help to meet pent up demand, as well as helping to demonstrate compliance with the NPPF's requirements on meeting affordable housing need.

### **Option 3: 420 new homes per year**

**4.13** Given that this option is above the upper end of the revised range for objectively assessed need, it will have a direct and significantly positive impact on the SA objective of homes for all. There is a critical need for 878 (net) affordable homes annually over the next five years across the Borough (ie wider than the plan area)<sup>(ix)</sup>. This option will go furthest towards meeting this need, to improving affordability and to stabilising increasing house prices. However it should be noted that the Council does not have evidence showing that this target is deliverable when assessed against the policies in the National Planning Policy Framework taken as a whole.

### **Impact on landscape and natural assets**

**4.14** One of the core planning principles at paragraph 17 of the NPPF is recognising the intrinsic character and beauty of the countryside. Paragraph 109 confirms the role of the planning system in contributing to and enhancing the natural and local environment by (amongst other things) protecting and enhancing valued landscapes and minimising impacts on biodiversity. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to European designated sites and land designated as Green Belt.

**4.15** The Council has set out to identify the extent to which any adverse impacts on the plan area's landscape and Green Belt arising from development of new homes, may outweigh the benefits of meeting housing need, when assessed against the policies in the Framework. The Council's Landscape Impact Assessment<sup>(x)</sup> notes that the landscape of the High Peak is recognised as being of national and international importance. Its quality reflects that of the adjoining Peak District National Park. The plan area includes parts of the Pennine Moors, Peak District Dales and Peak District Moors European designated sites. The North West Derbyshire Green Belt also extends across the northern and north central parts of the plan area. The report found that the Glossopdale, Central, and Buxton sub-areas were constrained in terms of development options due to their character as valley-bottom settlements. Much of the land on the periphery of settlements is elevated, with high visual prominence, has potential impact on the setting of the National Park and in places, fulfils Green Belt purposes.

### **Option 1: 310 new homes per year**

ix High Peak Housing Needs Study 2012-based SNHP Update; May 2015; NLP

x Landscape Impact Assessment, High Peak Local Plan; January 2014; Wardell Armstrong

## 4 Summary of Housing Target Options Appraisal

**4.16** The SA has found this option to have the least significant negative impact on the SA objectives relating to landscape character, biodiversity and sites designated for their wildlife or habitat value - as opportunities to protect sites with highest landscape value, including within Green Belt or affecting the setting of the National Park, are maximised. Restricting development to take account of landscape and natural assets constraints is in line with the NPPF and is supported by the Council's Local Plan evidence base.

**4.17** This option minimises the risk of negative effects on designated sites, in comparison with the other options considered. Of particular concern are the likely urban effects on European sites - effects identified in the Habitats Regulations Report<sup>(xi)</sup>. These likely significant effects result from development within the zone of influence of European sites that result in adverse impacts on the integrity of European designated sites. Such development is strictly controlled under European Habitats Regulations. The option also provides most protection for biodiversity and natural networks through minimising need for development in comparison with other options.

### **Option 2: 350 new homes per year**

**4.18** The SA has found this option to risk some negative impact on the SA objectives relating to landscape character, biodiversity and sites designated for their wildlife or habitat value - as development would be at a higher than the past average delivery rate (283dpa) and will require some greenfield development. However this scale of growth will require less development in the countryside than under option 3 and sufficient sites to meet the target have already been identified and are currently subject to examination in public.

**4.19** This option presents a lower risk of negative effects on designated sites, in comparison with option 3. Of particular concern are the likely urban effects on European sites - effects identified in the Habitats Regulations Report<sup>(xii)</sup>. These likely significant effects result from development within the zone of influence of European sites that result in adverse impacts on the integrity of European designated sites. Such development is strictly controlled under European Habitats Regulations. The option also provides more protection for biodiversity and natural networks than under option 3.

### **Option 3: 420 new homes per year**

**4.20** Of the three options considered, the SA has found this housing target to risk the most significantly negative impacts on the SA objectives relating to landscape character, biodiversity and sites designated for their wildlife or habitat value.

**4.21** This option is higher than the upper end of the May 2015 recommended OAN range (350dpa) and was the Council's OAN as agreed at the Examination Hearings of the Local Plan. It is considered to be a reasonable alternative as there are sites before the Inspector, not currently allocated in the Local Plan (omission sites), that taken together with allocations made in the submission plan, have the potential to deliver the target. However the Council has put evidence to the Inspector concerning the unsuitability of the omission sites for inclusion in the Local Plan.

xi Submission Version Habitats Regulations Assessment; ENVIRON; March 2014

xii Submission Version Habitats Regulations Assessment; ENVIRON; March 2014



## 4 Summary of Housing Target Options Appraisal

The reasons for the Council's view of unsuitability include inappropriate development in the Green Belt, significant harm to landscape or setting of the National Park and likely significant effects on the integrity of European designated sites.

**4.22** Higher levels of growth in Buxton pose a risk to the continued meeting of water quality objectives in the River Wye set under the Habitats Regulations.

### **Impact on climate change, congestion and flood risk**

**4.23** Despite individual properties being built to high environmental performance standards, an overall increase in dwellings and car journeys under Local Plan proposals will result in an increase in energy use and make a contribution to traffic congestion.

**4.24** However the Council's evidence base supporting the Local Plan suggests that road traffic congestion arising from the level of new development proposed through the submission version of the Local Plan (360dpa) can be accommodated. Evidence gathered as part of the Local Plan Transport Study<sup>(xiii)</sup> indicates that "the combined impact of the High Peak strategic sites would not result in insurmountable difficulties". The study considered the potential for the development proposed under the Local Plan to create impacts on the local highway network. The location of each residential and employment site in the Local Plan was considered in order to estimate the traffic likely to be generated on the local highway network. Mitigation measures were identified on a number of routes and at a number of specific junctions and transport strategies identified that would provide mitigation for some of the traffic growth impacts on the A6 corridor and on the A57 / A628 corridor.

**4.25** The Council's Environmental Policy<sup>(xiv)</sup> includes action to tackle climate change as one of its priorities.

### **Option 1: 310 new homes per year**

**4.26** Of the three options considered, the SA found this target to have the least significant negative impact on the SA objectives relating to energy, climate change, pollution (congestion) and flood risk. With the lowest development rate of the three options considered, this proposed housing target would present the least significant negative impacts in relation to climate change and air quality (congestion). Similarly, with the lowest level of growth of all options considered, it is considered likely to present the least significant risks to flooding, albeit dependent on the location of development and implementation of other policies.

**4.27** On the assumption that each new home will contribute to a net increase in greenhouse gas emissions, through promoting the lowest level of development, this option will do most to assist the Council in meeting its aim to ensure that the services we provide and policies we develop take account of predicted changes to our climate.

### **Option 2: 350 new homes per year**

xiii High Peak Local Plan Transport Study; July 2014; Derbyshire County Council

xiv <http://www.highpeak.gov.uk/hp/council-services/energy-and-climate-change/our-environmental-policy>

## 4 Summary of Housing Target Options Appraisal

**4.28** This option, representing the upper end of the May 2015 revised OAN range, is for assessment purposes, broadly equivalent to the housing target set out in the submission version Local Plan (360dpa). Growth at this level will lead to an increase in the number of car journeys made in the plan area. Even with policies in the Local Plan to control pollution, growth will result in an increase in noise and light pollution. However increasing local jobs might reduce the impact of out-commuting.

**4.29** The SA found the target to have less significant negative impacts on the SA objectives relating to energy, climate change, pollution (congestion) and flood risk than under option 3. Since the Council's evidence base supporting the Local Plan suggests that road traffic congestion arising from the level of new development proposed through the submission version of the Local Plan (360dpa) can be accommodated, this option is considered to assist the Council meet its aim to ensure that the services we provide and policies we develop take account of predicted changes to our climate.

### **Option 3: 420 new homes per year**

**4.30** Of all options considered, this target will result in the highest overall increase in carbon emissions from energy use associated with new development and associated car journeys.

**4.31** This option is higher than the upper end of the May 2015 recommended OAN range (350dpa) and was the Council's OAN as agreed at the Examination Hearings of the Local Plan. It is considered to be a reasonable alternative as there are sites before the Inspector, not currently allocated in the Local Plan (omission sites), that - taken together with allocations made in the submission plan - have the potential to deliver the target. However inclusion of the omission sites will result in development in less sustainable locations, increasing the number of car journeys made.

**4.32** The SA found the target to have more significant negative impacts on the SA objectives relating to energy, climate change, pollution (congestion) and flood risk than other options considered.

### **Impact on heritage assets and the character of towns and villages**

**4.33** The outstanding countryside and the culture and history of the market towns and villages are attractive features that draw visitors in from the surrounding major conurbations. The tourism industry offers major economic benefits to the area and although the SA found the effect of the housing target on both townscape and tourism uncertain, depending on the location of development and the implementation of other policies, negative impacts are predicted to arise from higher housing targets. This finding is based on the assumption that the higher housing targets require the most development sites and thus increase the risk that development may come forward on a site that risks harm to a heritage asset or has a negative impact on its setting. Paragraph 126 of the NPPF is clear that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment.

**4.34** Whilst the Local Plan proposes to protect and enhance historic and cultural elements that contribute to the character and appearance of individual towns and villages, the appraisal assumes that the character of settlements can be affected by large scale new development.

## 4 Summary of Housing Target Options Appraisal



### **Option 1: 310 new homes per year**

**4.35** The SA has found this option to have a potential, long term minor negative impact on the SA objectives relating to townscape and heritage assets. However the effect is uncertain as it will depend on the location of development and the implementation of other policies.

**4.36** The option is considered to support the Council's ambitions in relation to protecting and enhancing the historic and cultural elements that contribute to the character and appearance of individual towns and villages.

### **Option 2: 350 new homes per year**

**4.37** This option, representing the upper end of the revised OAN range, is for assessment purposes, broadly equivalent to the housing target set out in the submission version Local Plan (360dpa). Sufficient sites to meet the target have already been identified and are currently subject to examination in public.

**4.38** As with option 1, the SA found this option to have a potential, long term minor negative impact on the SA objectives relating to townscape and heritage assets. However the effect is uncertain as it will depend on the location of development and the implementation of other policies. The option is considered to support the Council's ambitions in relation to protecting and enhancing the historic and cultural elements that contribute to the character and appearance of individual towns and villages.

### **Option 3: 420 new homes per year**

**4.39** Whilst the assessment of effects on the SA objectives relating to townscape and heritage assets remains uncertain with this option, as it will depend on the location of development and the implementation of other policies, this option is predicted to present the greatest overall risk of a long-term negative impact - since the target is higher than the upper end of the May 2015 recommended OAN range (350dpa) and would rely on the inclusion of all omission sites.

**4.40** Of the options considered, this target is considered least able to support the Council's ambitions in relation to protecting and enhancing the historic and cultural elements that contribute to the character and appearance of individual towns and villages.

### **Impact on health and quality of life**

**4.41** Provision of open space for sport and recreation activity is important for the development of local communities as it promotes social interaction, contributes to the health and well being of local residents and improves the unique character and appearance of places. Open spaces can also influence perceptions of community safety, deprivation and poverty levels and the local economy.

**4.42** The vision for the Peak District set out in the Community Strategy<sup>(xv)</sup> is that the Peak District will be a distinctive, high quality rural environment with:

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xv Derbyshire Dales and High Peak Sustainable Community Strategy Update: Peak District Partnership Draft Statement of Priorities; 2015 - 2019

## 4 Summary of Housing Target Options Appraisal

- People of all ages who are healthy and safe;
- High-wage, high-skill jobs;
- Affordable, decent homes for local people; towns and villages that offer a high quality of life.

**4.43** In recognition of the importance of the economy and health and well-being agendas to improving the quality of life, one of the priorities identified for the strategy over the five years 2015 - 2020 is to reduce health inequalities and improve well-being in the Peak District, focusing on individuals and communities with poorer health or difficulty accessing services.

### **Option 1: 310 new homes per year**

**4.44** The SA has found this option to have mixed impacts on the SA objectives relating to health and quality of life including healthy travel networks, access to services and facilities and leisure and recreation.

**4.45** This option will deliver less housing growth than under other options considered and thus less opportunity for investment in improved health infrastructure, including new opportunities for walking cycling, leisure and recreation. However there is opportunity under this option to ensure new homes are delivered in close proximity to town and village centres, thereby improving choices for sustainable travel modes and helping to minimise journey lengths to key services and facilities. There is also a trade off between loss of countryside as a result of development and the provision of new accessible space as part of new developments.

**4.46** On balance the option is considered to support the Council's Sustainable Community Strategy priority to reduce health inequalities and improve well-being.

### **Option 2: 350 new homes per year**

**4.47** The SA has found this option to have mixed impacts on the SA objectives relating to health and quality of life including healthy travel networks, access to services and facilities and leisure and recreation.

**4.48** This option will deliver more housing growth than under option 1 but less than under option 3 and so some opportunity for investment in improved health infrastructure, including new opportunities for walking, cycling, leisure and recreation, including in areas of less affluence. Since sufficient sites to meet the target have already been identified and are currently subject to examination in public, it has been demonstrated that new homes will be delivered in line with the Local Plan's spatial strategy (and thus in proximity to town and village centres), thereby improving choices for sustainable travel modes and helping to minimise journey lengths to key services and facilities.

**4.49** On balance the option is considered to support the Council's Sustainable Community Strategy priority to reduce health inequalities and improve well-being.

### **Option 3: 420 new homes per year**

**4.50** The SA has similarly found this option to have mixed impacts on the SA objectives relating to health and quality of life including healthy travel networks, access to services and facilities and leisure and recreation.

## 4 Summary of Housing Target Options Appraisal



**4.51** This option will deliver more housing growth than under options 1 and 2 and so most opportunity for investment in improved health infrastructure, including new opportunities for walking cycling, leisure and recreation, including in areas of less affluence. However meeting the target is expected to result in the loss of existing recreation sites.

**4.52** On balance the option is considered to support the Council's Sustainable Community Strategy priority to reduce health inequalities and improve well-being. However it should be noted that the Council does not have evidence showing that this target is deliverable when assessed against the policies in the National Planning Policy Framework taken as a whole.

## 5 Equality Impact Assessment

**5.1** The purpose of this section of the Addendum is to show how the Council has complied with the Public Sector Equality Duty (set out in the Equality Act 2010)(i) in the assessment of potential modification to High Peak's emerging Local Plan. The broad purpose of the Equality Duty is to integrate consideration of equality and good relations into the day-to-day business of public authorities.

**5.2** An Equality Impact Assessment (EqIA) is a tool to assist public authorities with assessing the impact, or likely impact, of their policies and functions on people who share a relevant protected characteristic. It assists authorities with identifying adverse outcomes and steps that can be taken to mitigate adverse effects. EqIAs help public authorities to meet the requirements of their equality duties and identify active steps to promote equality.

**5.3** The EqIA described below has considered the impact, or likely impact, of the alternative housing target options on different equality groups, including women, people from ethnic minorities and those with disabilities. The findings of the assessment have been summarised to provide an overall assessment of each of the alternatives.

### Methodology

**5.4** A full EqIA of the High Peak Local Plan was undertaken as part of the SA process. This is considered in more detail in the EqIA report (examination library reference E10) and the SA Report for the submission version Local Plan (examination library reference E11).

**5.5** The needs and issues raised by representatives of protected groups were grouped and summarised into a number of key themes. The report found that in order to address the key equality impacts identified, the Local Plan should:

- Deliver future housing according to the diversity of local needs, including new homes that are affordable and adaptable.
- Provide access to employment opportunities, from all sectors of the economy and located close to where people live.
- Ensure appropriate levels of community infrastructure, including facilities for health and recreation, that are well located and readily accessible.
- Deliver safe and inclusive communities.
- Reduce rural isolation.

**5.6** These key equality themes have been used as criteria to assess the potential impact of the housing target alternatives for the emerging Local Plan, using the main risks associated with the differential impacts identified in the full EqIA. The availability of housing is an important issue for all protected groups. The main risks relating to housing needs associated with the differential impacts identified by the EqIA include:

- Deterioration of rural communities as people are priced out off the housing market and are forced to move away from the area.
- Ageing of population as young people / first time buyers cannot afford housing in the Local Plan area and are forced to move away.
- Discrimination against the trans-gender community as specific housing needs are not met through the availability of affordable homes.

## 5 Equality Impact Assessment

- Shortage of appropriate housing for older and disabled people through inflexible housing stock and a lack of suitably designed dwellings.
- Shortage of housing to meet the needs of disadvantaged communities and risk of further disadvantage by not introducing an appropriate mix of housing types and tenures into those disadvantaged areas.

**5.7** Taking into account the risks identified above, the nature of the likely equality impact of each of the alternative housing target options is provided in Table 3 on the following page:



## 5 Equality Impact Assessment

**Table 3 Assessment of Equality Impacts**

Differential Impact Risk	Option 1: 310 dpa	Option 2: 350dpa	Option 3: 420dpa
Deterioration of rural communities with people priced out of the housing market	Under this target there is expected to be a loss of jobs and a continued loss of young, economically active residents from the Borough, including from rural areas, risking deterioration of rural communities.	This option will go further than option 1 towards meeting affordable housing need and will support a small net increase in jobs, helping to resist the risk of deterioration of rural communities.	Of the three options, this target would do most to help meet affordable housing need, support job growth and deliver an increase in the working age population. These outcomes are expected to help support rural communities.
Ageing of population as lack of affordable homes forces young people to move away	This target does not adjust housing supply above demographic-led projections and so is expected to make the least contribution of the three options towards helping young people / first time buyers to afford housing in the Local Plan area.	This option is the upper end of the revised (May 2015) objectively assessed need for the Borough and so will go further than option 1 towards helping young people / first time buyers to afford housing in the Local Plan area.	Given that this option is above the upper end of the revised (May 2015) objectively assessed need for the Borough, it is anticipated to go the furthest of all options considered towards meeting assessed affordable housing need.
Discrimination against the trans-gender community as specific housing needs not met	The availability of affordable homes will be most restricted under this option.	This option will go further than option 1 towards meeting affordable housing need and thus the specific needs identified by this community.	Under this target, delivery of the most number of affordable homes is expected, making this option the most likely to help meet the specified needs of this community.
Shortage of appropriate housing for older and disabled people through inflexible stock	Policies in the Local Plan are designed to address the issues of housing stock and suitability of design of new dwellings to meet the needs of older and disabled people. However	Policies in the Local Plan are designed to address the issues of flexibility of housing stock and suitability of design of new dwellings to meet the needs of	Of the options considered, this target presents most opportunities to address the issues of flexibility of housing stock and suitability of design of new dwellings to meet

## 5 Equality Impact Assessment



Differential Impact Risk	Option 1: 310 dpa	Option 2: 350dpa	Option 3: 420dpa
	<p>as the target delivering the lowest number of new homes overall, this option will make the least contribution towards addressing these issues.</p>	<p>older and disabled people. However this option presents more opportunities than under option 1 for addressing these issues.</p>	<p>the needs of older and disabled people.</p>
<p>Shortage of housing to meet the needs of socially deprived communities through inappropriate mix of type and tenure in disadvantaged areas</p>	<p>Policies in the Local Plan are designed to address the issue of delivering an appropriate mix of housing types and tenures, including in disadvantaged areas. However, of the options considered, this target will offer the least contribution to meeting the needs of disadvantaged communities by doing the least to address the shortage of housing overall and presents the greatest risk of further disadvantage by providing least opportunity to introduce an appropriate mix of housing types and tenures into disadvantaged areas.</p>	<p>Policies in the Local Plan are designed to address the issue of delivering an appropriate mix of housing types and tenures, including in disadvantaged areas. However this option presents more opportunities than under option 1 for addressing these issues.</p>	<p>Of the options considered, this target presents most opportunities to address the shortage of housing to meet the needs of disadvantaged communities and to help deliver an appropriate mix of housing types and tenures in disadvantaged areas.</p>

## 6 Selection of Preferred Housing Target Option

**6.1** Sections 4 and 5 of this Addendum Report have examined the sustainability and equalities impacts of the three alternative housing target options considered. This section sets out the reasons for recommending the selection of an option to take forward for consultation, in the light of the other reasonable alternatives considered.

### Option recommended to take forward for consultation

**6.2** It is recommended that housing target option 2: 350 new homes each year should be taken forward for consultation, for the reasons set out below.

**6.3** The housing target option of 350 new homes per year is based on a scenario of job growth. One of the principal benefits of the target is that by going further than meeting demographically generated demand, the Council is able to overturn the forecast long-term fall in jobs in High Peak and go some way towards stabilising the workforce. Under this option, a net increase of 469 jobs is expected. By supporting job creation in this way, the Council is able to help ensure that High Peak fulfils its potential within the Greater Manchester sub-region and the wider county.

**6.4** There is an identified need of 878 (net) affordable homes annually over the next five years across the Borough. This option, by providing market housing over and above the demographically projected need, will make a significant and deliverable contribution to meeting affordable need. This will play an important role in helping young people and first time buyers to afford housing in the Local Plan area and will help both to reduce the housing waiting list and meet pent up demand for affordable homes. Improving affordability will help to stem the loss of economically active residents from the Borough, which is key to supporting economic development and can help to avoid the deterioration of rural communities.

**6.5** The 2012-based Sub-National Population Projections for High Peak show an ageing profile of the community. By 2031 it is anticipated that there will be a considerable growth in the number of older people resident in the Borough, the percentage of males aged over 90 more than trebles between 2012 and 2031, whilst the percentage of females aged over 90 almost doubles over the same time period<sup>(xvi)</sup>. By boosting housing supply to the upper end of the May 2015 revised OAN range, this option maximises opportunities for the Council to address the issues of flexibility of housing stock and suitability of design of new dwellings to help meet the needs of older and disabled people.

**6.6** The Equality Impact Assessment has further highlighted the benefits that this option brings in relation to meeting the needs of disadvantaged communities by improving affordability overall and maximising the opportunities to introduce an appropriate mix of housing types and tenures into disadvantaged areas.

**6.7** Through the published evidence base supporting the submitted Local Plan, the Council has demonstrated that there are sufficient sites to deliver a target of 350 new homes annually, in locations where mitigation is possible to address any identified impacts on landscape character, purposes of the Green Belt, integrity of European designated sites and the setting of the Peak

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xvi High Peak Housing Needs Study 2012-based SNHP Update; Nathaniel Lichfield & Partners; May 2015



## 6 Selection of Preferred Housing Target Option

District National Park. The Council's evidence base also indicates that road traffic congestion arising from the level of new development proposed through the submission version of the Local Plan can be accommodated.

**6.8** This housing target will assist the Council meet the aims of its Growth Plan, its Environmental Policy objectives on climate change, Council ambitions in relation to protecting the character and appearance of individual towns and villages and the Council's sustainable community strategy priorities, including to reduce health inequalities and improve well-being.

**6.9** For these reasons, it is recommended to take forward for consultation housing target option 2: 350 new homes each year. The rationale for recommending dismissal of the alternative options is set out in Table 4 below.

**Table 4 Housing target options recommended for dismissal**

Options recommended not to be taken forward	Rationale
310 new homes per year	<ul style="list-style-type: none"> <li>● Fails to provide support for the priorities outlined in the Council's Growth Plan. Over the period 2012 - 2031 the Borough could expect a 4% fall in the labour force and a loss of 581 jobs. The Council would thus not be well placed to fulfil its potential within the wider Derbyshire County and Greater Manchester sub-region.</li> <li>● Fails to provide market housing over and above the demographically projected need in order to help meet the identified need for affordable homes. This presents the risk of failure to meet requirements of the NPPF as well as continued risk of overcrowding in the private and social housing stock (with associated physical and mental health costs) and a continued loss of economically active residents from the Borough.</li> <li>● Risks deterioration of rural communities.</li> <li>● Fails adequately to support the needs of older and disabled people and those living in disadvantaged areas by failing to address the shortage of housing overall as well as failing to maximise opportunities to improve the flexibility of housing stock, the appropriate design of new dwellings and the introduction of appropriate mixes of housing types and tenures, especially into disadvantaged areas.</li> </ul>
420 new homes per year	<ul style="list-style-type: none"> <li>● The Council does not have evidence that supports delivery of this target.</li> <li>● Meeting this target would require allocation of all omission sites - those sites currently before the Inspector, but not included in the submission version of the Local Plan. The Council has put evidence to the Inspector concerning the unsuitability of the omission sites for inclusion in the Local Plan.</li> <li>● The reasons for the Council's view of unsuitability of omission sites include inappropriate development in the Green Belt, significant harm to landscape</li> </ul>

## 6 Selection of Preferred Housing Target Option

Options recommended not to be taken forward	Rationale
	<p>or setting of the National Park and likely significant effects on the integrity of European designated sites.</p> <ul style="list-style-type: none"> <li>• Of the omission sites, around 500 homes have been proposed on sites in Chapel-en-le-Frith. Chapel-en-le-Frith Parish Council has prepared a Neighbourhood Plan for the Parish, the Plan is due to be put to a referendum on 16 July 2015. None of the Chapel-en-le-Frith omission sites are included as housing allocations in the Neighbourhood Plan.</li> <li>• The SA found this target to have more significant negative impacts on the SA objectives relating to energy, climate change, pollution (congestion) and flood risk than the other options considered.</li> </ul>



## 7 Summary of proposed Main Modifications appraisal and consideration of alternatives

**7.1** The aim of this section is to present an appraisal of the proposed Main Modifications and to discuss the alternative approaches considered to the modifications proposed for consultation.

### Introduction

**7.2** The Council has received new evidence relating to its objectively assessed need for housing and the heritage impacts of the housing allocation at Woodhead Road, Glossop. Consideration of this evidence and other matters has led the Council to consider a revised Local Plan housing requirement and related Main Modifications.

**7.3** At this stage the Council is considering only those potential Main Modifications discussed by the Inspector in his letter of 4<sup>th</sup> March 2015 and that relate to the implications for the Local Plan from consideration of the new evidence. This SA Addendum Report is therefore limited to the small number of Main Modifications considered by the Council on 11<sup>th</sup> June 2015 and set out in the Council Report and Report Update at:

<http://www.highpeak.gov.uk/sites/default/files/meetings/papers/papers-625814891/106.pdf>

**7.4** On 24<sup>th</sup> October 2014 the Council wrote to the Inspector to request that he make recommendations for modifications that he considers necessary to make the High Peak Local Plan sound and legally compliant. The Council anticipates that following the close of the High Peak Local Plan Examination Hearing Sessions a full list of Main Modifications will be proposed and a further SA report will be needed to ensure that the potential social, environmental and economic effects of all modifications are fully assessed for significant sustainability impacts and reported on as part of the continuing plan making process.

### Considering alternative options

**7.5** Appraisal of reasonable alternatives before developing a preferred approach for consultation is a fundamental part of the SA process. The SA Report published alongside the submission version of the Local Plan (examination library reference E11) explains in detail how plan making has been informed by appraisal of reasonable alternatives. In section 6 of this SA Report Addendum there is an explanation of how the selection of a revised housing target to recommend for consultation has been undertaken in the light of other reasonable alternatives considered.

**7.6** The proposed modifications for consultation June - July 2015 have not, however, been developed following an SA of reasonable alternatives. Instead, it was deemed appropriate and reasonable to consider that the alternatives to the proposed modifications are represented by the existing text or policy in the submitted Local Plan. The existing approach in the submitted Local Plan has been subject to on-going sustainability appraisal as part of the plan making process.

**7.7** It should be noted that where a proposed Main Modification relates to amendment or insertion to the text of a policy or its supporting text, the appraisal has focused on the outcomes in terms of the proposed modification itself, and not the original policy or text, which has already been subject to sustainability appraisal through earlier stages of the plan making process.

## 7 Summary of proposed Main Modifications appraisal and consideration of alternatives

### Proposed Main Modifications

**7.8** The proposed Main Modifications are set out in full in section 9 of this Addendum. In summary, the modifications proposed are to:

- Modify Policy S3 (Strategic Housing Development) and supporting text to reflect a revised Local Plan housing requirement of 350dpa.
- Modify Policy S3 to remove the reference to the Cheshire East Local Plan accommodating 500 homes on behalf of High Peak.
- Modify Policy H3 (Housing Allocations) to remove the Woodhead Road, Glossop housing allocation and provide updated planning permission figures.

### Appraisal Summary

**7.9** A statement of common ground agreed between the Council, Derbyshire County Council and Omya UK Ltd<sup>(xvii)</sup> agrees to a reduction in the housing capacity of the site West of Tongue Lane, Fairfield, Buxton (B8) [Policy DS16] from 215 to 139 - a loss of 76 homes. The agreement has been reached as a result of concerns relating to a potential conflict with operations within the Ashwood Dale Quarry site and its proposed extension. The statement refers to the introduction of a 200m buffer from an amended extension to the quarry, in order to minimise any potential noise and vibration impacts associated with quarry blasting.

**7.10** The modification proposed to reflect this agreement will have a positive impact on the sustainability objective to maintain good local air quality and to minimise noise and light pollution. The loss of 76 homes during the plan period will have only a minor negative impact on the objective for "homes for all" in the medium to long term, particularly in the context of a reduced range for objectively assessed need for housing. Other effects are very limited.

**7.11** A modification is proposed to remove the housing site allocation for 121 new homes at Woodhead Road, Glossop (sites G8, G9, G10 and G11) [Policy DS6]. The elevated parts of the site have long range views of the National Park. The southern part of the site lies within the Old Glossop Conservation Area. G8 is directly adjacent to the grade II listed Laneside Farm. Sites G10 and G11 are close to the grade II listed Roman Catholic Church to the south.

**7.12** The proposed Main Modification addresses the issues raised in the Heritage and Landscape Appraisal of land at Woodhead Road, Glossop<sup>(xviii)</sup> that found development of all of the sites contained within Policy DS6 would cause harm, to varying degrees, to the character and setting of Old Glossop Conservation Area. The Report concluded that development would effectively damage the separate identity of Old Glossop as an early settlement within an agricultural landscape and would affect the sense of place. The modification will thus have a positive impact on the sustainability objective to conserve and enhance town / village - scape quality, archaeological and heritage assets along with their settings.

xvii Examination Library Reference Q17

xviii High Peak Local Plan, Land at Woodhead Road - Policy DS6, Heritage and Landscape Appraisal; June 2015; Mel Morris Conservation



## 7 Summary of proposed Main Modifications appraisal and consideration of alternatives

**7.13** The evidence also found the landscape within the allocated sites to hold local significance. The landscape was found to be both significant and sensitive in both heritage and landscape terms and it was considered that these values would be greatly altered by development within it. Consequently the modification will have a positive impact on the sustainability objective to protect and enhance the character and appearance of the landscape, including cultural landscape assets, as well as the area's other natural assets and resources.

**7.14** The above Main Modifications proposed to housing site allocations would result in a combined loss of 197 homes to the projected housing supply. Whilst this is in the context of a reduced range for objectively assessed need for housing, overall the impact on the sustainability objective for homes for all is likely to be negative with the loss of a number of affordable units and a lower overall supply of new homes. Other effects are very limited.

**7.15** Modification to Policy S3 is proposed to remove the reference to the Cheshire East Local Plan accommodating 500 homes on behalf of High Peak. Since the objectively assessed housing need range has been revised down from 420-470 to 310-350, the Council is in a better position to be able to demonstrate that it can meet its housing needs without the assistance of Cheshire East Council or others. In addition, as part of their ongoing Local Plan examination, further work undertaken by Cheshire East Council to reconsider its housing requirement has concluded that Cheshire East should plan for a further 9,000 homes over and above the level envisaged at the time it was agreed that Cheshire East could accommodate 500 extra homes on behalf of High Peak (an increase in the OAN from 27,000 to 36,000 over the 20 year plan period). Consequently, the proposed modification will not result in any increase in the overall level of growth in High Peak, nor in the proposed locations of new homes in the plan area. An increase in growth is likely to take place in Cheshire East, with the modification resulting in all of those additional homes now contributing to meeting the needs of that Council. On this basis it is considered that the modification does not change the impacts previously identified on sustainability objectives.

## 8 Matrices with Appraisal of Housing Target Alternatives

**8.1** The tables below record the full appraisal findings of three alternative housing target options considered following the publication of the High Peak Housing Needs Study 2012-based SNHP Update in May 2015.

**Table 5 Key to scoring of options**

Score	
++	The policy will have a very positive impact on the sustainability objective
+	The policy will have a slightly positive impact on the sustainability objective
0	The policy will have a negligible or neutral impact on the sustainability objective. A recorded neutral effect does not necessarily mean that there will be no effect at the project level, but shows that at this strategic level there are no identifiable effects.
-	The policy will have a slightly negative impact on the sustainability objective
--	The policy will have a very negative impact on the sustainability objective
i	The outcome of implementing the policy could be dependent upon implementation, or more detail is required to make an assessment
?	The impact of an issue cannot be predicted at this stage

**8.2** Different components within an option may generate varying impacts. This is indicated by "/"

### **Key to table**

ST: Short Term = 0 - 5 years

MT: Medium Term = 5 -10 years

LT: Long Term = over 10 years

# 8 Matrices with Appraisal of Housing Target Alternatives



## Scenario A: 2012 SNHP/2012 SNPP (2012 Baseline)

Table 6 Assessment Table for Scenario A: 2012 SNHP/2012 SNPP (2012 Baseline): Housing target Option 1

SA Objective	Option: 1: 310 new homes each year					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
1. Economic development	Economic growth to be supported, with a more balanced employment distribution by sector. Supply of suitable employment land required.	This option fails to provide full support for economic growth, with the working age population predicted to decline by 4% by 2031. The scenario indicates that the number of jobs would decline by 581 over the period to 2031. <sup>(1)</sup> .	-	-	--	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> A stable local labour supply will help to deliver economic growth in the plan area.
2. Town Centres	Need to maintain and enhance vitality and viability of High Streets and town and village centres.	Under this scenario the population of High Peak is projected to increase by 6,911 to 2031. High Streets and town and village centres are predicted to benefit from the increase in local population, through an increase in spending in the local economy.	+	+	++	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Residents of new developments will use their local centres where appropriate.
3. Tourism	Strength of visitor economy to be supported and maintained.	Effect is uncertain. Given that the level of growth is greater than average past delivery (287dpa) minor negative impacts on congestion, landscape and townscape are risked. Depending on the location of development and the implementation of other policies, there is consequent	?	?	?	<b>Likelihood / certainty:</b> Uncertain <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> This option would require the lowest overall take of countryside sites and would reduce the need to consider sites in the Green

# 8 Matrices with Appraisal of Housing Target Alternatives

SA Objective	Option: 1: 310 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
		potential for a negative impact on tourism but any such negative impact would be lowest under this option.				Belt and the National Park buffer, compared to all other options considered.
4. Pollution	Detrimental impact on existing areas of poor air quality - along A628 - to be avoided. Development to take into account impacts on air quality and noise and from artificial light.	Effect is uncertain, but negative overall. Whilst growth at this level is predicted to lead to an increase in traffic, including along the A628, and to an increase in congestion, improving car technology may mean that there are no long term significant negative effects on air quality. Increases in noise and light pollution will result.	-	-	?	<p><b>Likelihood / certainty:</b> Uncertain; <b>Geographical scale:</b> Local Plan area; <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b></p> <p>Growth at this level will lead to an increase in the number of car journeys made in the plan area. Even with policies in the Local Plan to control pollution, growth will result in an increase in noise and light pollution.</p>
5. International, national, local wildlife sites	Need to protect designated sites, optimise their condition and improve their connectivity.	This option reduces the risk of negative effects on designated sites, in comparison with all other options. 9.47% of the plan area is designated as either a European site, SSSI, LNR or LWS <sup>(2)</sup> . Of particular concern are the likely urban effects on European sites - effects identified in the HRA Report <sup>(3)</sup> . These effects result from development within the zone of influence of European sites and	-	-	--	<p><b>Likelihood / certainty:</b> Likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b></p> <p>Policies in the Local Plan will seek to provide protection for designated sites, but high levels of growth will require development in areas of landscape value, including those sites with potential to form part</p>

# 8 Matrices with Appraisal of Housing Target Alternatives



SA Objective	Option: 1: 310 new homes each year					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
		result in adverse impacts on the integrity of such sites. Such development is strictly controlled under European Habitats Regulations.				of an Ecological Network and within the zone of influence of European sites. This option is best able to protect the integrity of sites including European sites.
6. Biodiversity	Aim to achieve a net gain for biodiversity and enhanced natural networks.	This option provides most protection for biodiversity and natural networks. Whilst the option will require a take of greenfield sites, risking some loss of biodiversity, the option provides most opportunities to protect sites in the Green Belt and those contributing to ecological networks.	-	-	-	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area  <b>Temporary / permanent:</b> permanent  <b>Assumptions made:</b> This housing requirement provides a greater protection for biodiversity compared with other options considered, as fewest countryside sites will be required.</p>
7. Energy and climate change	Need to reduce carbon emissions and deal with the impacts of climate change.	Of all options considered, this option will result in the lowest overall increase in carbon emissions from energy use associated with new development and associated car journeys.	-	-	-	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area  <b>Temporary / permanent:</b> permanent  <b>Assumptions made:</b> Even if individual properties are built to high environmental performance standards, the total increase in dwellings and car journeys will increase energy use.</p>

# 8 Matrices with Appraisal of Housing Target Alternatives

SA Objective	Option: 1: 310 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
8. Townscape and heritage assets	Historic and cultural elements that contribute to the character and appearance of individual towns and villages to be protected and enhanced.	The effect of this is uncertain as it will depend on the location of development and implementation of other policies. However highest levels of growth are most likely to put historic and cultural elements and their settings at risk of harm. This option presents the lowest risk to heritage assets and overall townscape quality in comparison with other options considered.	?	?	-	<p><b>Likelihood / certainty:</b> possible</p> <p><b>Geographical scale:</b> Local Plan area</p> <p><b>Temporary / permanent:</b> permanent</p> <p><b>Assumptions made:</b> The higher the housing target, the more development sites that are required, and the greater the risk that development will come forward on a site that risks harm to an asset or has a negative impact on its setting. Overall townscape character can be reduced by large scale new development.</p>
9. Landscape character and natural assets	Need to protect and reinforce landscape character to maintain and strengthen local distinctiveness and sense of place. New development to conserve and enhance cultural landscape assets as well as other natural assets including water	Development at higher than the average past delivery rate (287dpa) risks negative effects on landscape character and natural assets, however the significance is lower for this option than under others considered as opportunities to protect sites with highest landscape value, including within Green Belt or within the buffer of the National Park, are maximised. The SHLAA has identified potential sites within and on the edge of market towns and	-	-	-	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area and National Park</p> <p><b>Temporary / permanent:</b> permanent</p> <p><b>Assumptions made:</b> This scale of growth will require less development in the countryside, including in the Green Belt, offering a greater level of protection for landscape character and natural assets than under other options considered.</p>



# 8 Matrices with Appraisal of Housing Target Alternatives

SA Objective	Option: 1: 310 new homes each year					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
10. Flood risk	<p>courses and ancient woodlands.</p> <p>New development to be located in flood zone 1. Water efficiency measures to be supported and SuDS required. Minimise discharge of phosphates into River Wye and support other water quality objectives.</p>	<p>larger villages to accommodate growth, but much is within Green Belt or on sites unlikely to be deliverable within the plan period. The LIA<sup>(4)</sup> has identified much of the surrounding countryside as having significant landscape value and identified limited scope to amend Green Belt boundaries. 31% of the Plan area is designated Green Belt.</p> <p>There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and implementation of other policies. However this option will require less reliance than other options on greenfield sites and those in flood zones 2 and 3, resulting in a lesser overall risk of flooding and a lower impact on water quality. There is evidence that this level of growth can be delivered in Buxton without adverse impact on the integrity of the Peak District Dales SAC through phosphate discharges into the River Wye from the Buxton STW.</p>	?	?	-	<p><b>Likelihood / certainty:</b> Unknown  <b>Geographical scale:</b> Local Plan area  <b>Temporary / permanent:</b> permanent  <b>Assumptions made:</b> This requirement offers less risk of surface water flooding compared with other options considered. Highest levels of growth in Buxton pose most risk to the continued meeting of water quality objectives in the River Wye set under the Habitats Regulations.</p>

# 8 Matrices with Appraisal of Housing Target Alternatives

SA Objective	Option: 1: 310 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
11. Sustainable transport	Locate new development in areas allowing choice of sustainable travel modes and good road network. Improve healthy travel networks.	Housing growth according to this scenario will present fewer opportunities to improve facilities for sustainable transport than is possible under other options considered. However, there is more opportunity to ensure new housing sites are delivered in close proximity to town and village centres.	+	+	+	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> A lower level of housing growth will enable a lower level of investment in walking and cycling routes and improving road junctions where necessary. However this assumes that investment in new infrastructure keeps pace with growth.
12. Health	Support active travel and deliver good quality, open green space, particularly in areas of less affluence; support health and independence in old age and ensure adequate health infrastructure.	This option will deliver less housing growth than under other options considered and thus less opportunity for investment in improved health infrastructure, including new opportunities for walking and cycling. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments.	+	+	+	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> Permanent <b>Assumptions made:</b> Investment in new infrastructure keeps pace with growth.
13. Access	Journey lengths to key services and facilities to be minimised.	This option will deliver less investment opportunity than under other options considered to help	?	?	?	<b>Likelihood / certainty:</b> unknown <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent:

# 8 Matrices with Appraisal of Housing Target Alternatives



SA Objective	Option: 1: 310 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
		improve accessibility to services and facilities. It is recognised that in all sub-areas there are severe limitations to the highways network that require significant investment to rectify - constraints to growth that are unlikely to be overcome during the plan period. In particular the main road connections between High Peak and Greater Manchester and Sheffield along the A6, A57 and A628. This option minimises the risk of severe congestion resulting from new development.				<p><b>permanent Assumptions made:</b> Investment in new infrastructure keeps pace with growth.</p> <p>There is more opportunity under this option to ensure new housing sites are delivered in close proximity to town and village centres.</p>
14. Community safety and cohesion	Support for mixed use developments, strong neighbourhood centres and active street frontages. Safety and crime prevention to be addressed by new development.	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and implementation of other policies.	?	?	?	<p><b>Likelihood / certainty:</b> Uncertain <b>Geographical scale:</b> Local Plan area <b>Temporary/permanent:</b> permanent <b>Assumptions made:</b></p>
15. Homes for all	Need to increase the number of affordable homes, especially in Glossopdale; and ensure provision of	Given that this option is the lower end of the range for objectively assessed need, it will have a positive impact on this SA objective, although the impact will be less significant than	+	+	++	<p><b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary/permanent:</b> permanent <b>Assumptions made:</b> This option will meet the lower</p>

# 8 Matrices with Appraisal of Housing Target Alternatives

SA Objective	Option: 1: 310 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
	<p>extra care / sheltered housing to meet needs of older people.</p>	<p>under other options considered. There is a critical need for 878 (net) affordable homes annually over the next five years across the Borough (ie wider than plan area)<sup>(5)</sup>. This option does not adjust housing supply above demographic-led projections and of all options considered, will do least to improve affordability and stabilise increasing house prices.</p>				<p>end of the recommended range for objectively assessed housing need in the plan area. However it will fail fully to take into account affordable housing needs.</p>
16. Leisure and recreation	<p>Support provision of locally accessible opportunities for physical activity and other cultural and leisure activities; also provide new allotment space and other opportunities for community food growing.</p>	<p>This option will deliver the least housing growth of options considered and thus the least opportunity to invest in provision of locally accessible opportunities for leisure and recreation.</p>	+	+	+	<p><b>Likelihood / certainty:</b> likely  <b>Geographical scale:</b> Local Plan area  <b>Temporary / permanent:</b> permanent  <b>Assumptions made:</b> Investment in new infrastructure keeps pace with growth.</p>
<p><b>Summary of significant effects:</b></p> <p>This option proposes the delivery of 310 new dwellings per year. This would provide a significant boost for the supply of housing in the plan area as it exceeds the past average rate of housing delivery (287 dpa). A target of 310dpa would have a direct, long-term, positive effect on the SA objective to provide homes for all since it represents the lower end of the May 2015 range for objectively assessed housing need. However the target would fail fully to take into account affordable housing needs and will do least of all</p>						

# 8 Matrices with Appraisal of Housing Target Alternatives



SA Objective	Option: 1: 310 new homes each year					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
	<p>options considered to improve affordability and stabilise increasing house prices. This option also fails to provide full support for economic growth, with the working age population predicted to decline by 4% by 2031 and the number of jobs predicted to decline by 581 over the same period. This option has potential for significant, indirect, minor positive effects on SA objectives relating to sustainable transport, health, and leisure and recreation. The negative effects predicted on SA objectives relating to congestion, biodiversity, protection of sites designated for nature conservation (including European sites) and landscape character and natural assets are minimised under this option as it represents a lower level of growth than other options considered.</p>					

1. High Peak Housing Needs Study 2012-based SNHP Update, NLP, May 2015
2. Derbyshire Wildlife Trust, personal communication, 03/02/14
3. Submission version Habitats Regulations Assessment, ENVIRON, March 2014
4. High Peak Local Plan Landscape Impact Assessment, Wardell Armstrong, January 2014
5. High Peak Housing Needs Study 2012-based SNHP Update; May 2015; NLP

# 8 Matrices with Appraisal of Housing Target Alternatives

## Scenario G: Policy On Job Growth

Table 7 Assessment Table for Scenario G: Policy On Job Growth: Housing Target Option 2

SA Objective	Option: 2: 350 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
1. Economic development	Economic growth to be supported, with a more balanced employment distribution by sector. Supply of suitable employment land required.	This option offers significant positive effects for economic development with an estimated net increase of 469 jobs between 2012 - 2031 and just a 1% fall in the labour force over the same period <sup>(1)</sup> .  The option supports the level of job growth set out in the Council's Employment Land Review.	+	++	++	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> It will be necessary to ensure an adequate supply of suitable housing in order to support the achievement of the Council's employment growth objectives.
2. Town Centres	Need to maintain and enhance vitality and viability of High Streets and town and village centres.	To underpin the level of job growth there would need to be an increase in the population of 7,334 and an increase in dwellings of 6,682 from 2012 - 2031. High Streets and town and village centres are predicted to benefit from this increase in local population, through an increase in spending in the local economy.	+	++	++	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Residents of new developments will use their local centres where appropriate.
3. Tourism	Strength of visitor economy to be supported and maintained.	Effect is uncertain. Given the level of growth, impacts on congestion, landscape and townscape character may be predicted. Depending on the location of development and the	?	?	?	<b>Likelihood / certainty:</b> Uncertain <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Growth is

# 8 Matrices with Appraisal of Housing Target Alternatives



SA Objective	Option: 2: 350 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
		implementation of other policies, a consequent indirect, minor negative impact on tourism is possible.				likely to increase traffic congestion and require development in areas of landscape value. An impact on the setting of the Peak District National Park is risked. Overall this may make the area less attractive to visitors.
4. Pollution	Detrimental impact on existing areas of poor air quality - along A628 - to be avoided. Development to take into account impacts on air quality and noise and from artificial light.	Effect is uncertain, but anticipated to be negative overall. Whilst growth at this level is predicted to lead to an increase in traffic, including along the A628, and to an increase in congestion, improving car technology may mean that there are no long term significant negative effects on air quality. Increases in noise and light pollution will result.	-	-	?	<p><b>Likelihood / certainty:</b> Uncertain  <b>Geographical scale:</b> Local Plan area  <b>Temporary / permanent:</b> permanent  <b>Assumptions made:</b>                      Growth at this level will lead to an increase in the number of car journeys made in the plan area. Even with policies in the Local Plan to control pollution, growth will result in an increase in noise and light pollution. However increasing local jobs might reduce the impact of out-commuting.</p>
5. International, national,	Need to protect designated sites, optimise their condition	This option risks negative effects on designated sites, however significance is less than under Option 3. 9.47% of the plan area is	-	-	--	<p><b>Likelihood / certainty:</b> Likely  <b>Geographical scale:</b> Local Plan area  <b>Temporary / permanent:</b> permanent  <b>Assumptions</b></p>

## 8 Matrices with Appraisal of Housing Target Alternatives

SA Objective	Option: 2: 350 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
local wildlife sites	and improve their connectivity.	designated as either a European site, SSSI, LNR or LWS. (2). Of particular concern are the likely urban effects on European sites - effects identified in the HRA Report(3). These effects result from development within the zone of influence of European sites and result in adverse impacts on the integrity of such sites. Such development is strictly controlled under European Habitats Regulations.				<b>made:</b> Policies in the Local Plan will seek to provide protection for designated sites, but growth at this level will require countryside development that may affect wildlife sites and potentially within the zone of influence of European sites. Impacts on designated sites and their settings or connectivity are risked.
6. Biodiversity	Aim to achieve a net gain for biodiversity and enhanced natural networks.	This option risks negative effects on biodiversity and natural networks, however significance is less than under option 3. This option will require development of greenfield sites and thus may result in some loss of biodiversity and risk to the development of ecological networks, even given implementation of other policies.	-	-	--	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Housing development at this scale may have an impact on biodiversity as it will require development on greenfield sites.
7. Energy and climate change	Need to reduce carbon emissions and deal with the impacts of climate change.	This option will result in an overall increase in carbon emissions from energy use associated with new development and associated car journeys. To meet the increase in	-	-	--	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Even if individual properties are



# 8 Matrices with Appraisal of Housing Target Alternatives

SA Objective	Option: 2: 350 new homes each year					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
		target compared with option 1, sites in less sustainable locations will be required, increasing the number of car journeys made.				built to high environmental performance standards, the total increase in dwellings and car journeys will increase energy use.
8. Townscape and heritage assets	Historic and cultural elements that contribute to the character and appearance of individual towns and villages to be protected and enhanced.	The effect of this is uncertain as it will depend on the location of development and the implementation of other policies. However higher levels of growth are more likely to put historic and cultural elements and their settings at risk. The option presents lower risk to overall townscape quality from inappropriate development - than posed under option 3.	?	?	-	<b>Likelihood / certainty:</b> possible <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The higher the housing target, the more development sites that are required, and the greater the risk that development will come forward on a site that will risks harm to an asset or its setting. There is risk of negative impact on overall townscape character resulting from large scale new development.
9. Landscape character and natural assets	Need to protect and reinforce landscape character to maintain and strengthen local distinctiveness and sense of place. New development to conserve and enhance cultural landscape	This option risks negative effects on landscape character and natural assets, however significance is lower than under option 3. The SHLAA has identified potential sites within and on the edge of market towns and larger villages to accommodate growth, but much is within Green Belt or on sites unlikely to be deliverable	-	-	--	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area and National Park <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> This scale of growth will require less development in the countryside, including in the Green Belt, than under option 3.

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SA Objective	Option: 2: 350 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
	assets as well as other natural assets including water courses and ancient woodlands.	within the plan period. The LIA <sup>(4)</sup> has identified much of the surrounding countryside as having significant landscape value and identified limited scope to amend Green Belt boundaries. 31% of the Plan area is designated Green Belt.				Sufficient sites to meet this target have already been identified and been subject to Examination.
10. Flood risk	New development to be located in flood zone 1. Water efficiency measures to be supported and SuDS required. Minimise discharge of phosphates into River Wye and support other water quality objectives.	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and implementation of other policies. However higher levels of growth than under option 1 are likely to result in a marginal increase in overall risk of flooding. There is evidence that this level of growth can be delivered in Buxton without adverse impact on the integrity of the Peak District Dales SAC through phosphate discharges into the River Wye from the Buxton STW.	?	-	-	<b>Likelihood / certainty:</b> Unknown <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Despite policies in the plan, higher levels of growth will require more greenfield development, creating a greater risk of surface water flooding. Higher levels of growth in Buxton pose a risk to the continued meeting of water quality objectives in the River Wye set under the Habitats Regulations.
11. Sustainable transport	Locate new development in areas allowing choice of sustainable travel modes and good road network. Improve	Housing growth at this level will present opportunities to improve facilities for sustainable transport. However unless investment is made in healthy travel networks, more car journeys will result.	+	+	++	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> High levels of housing growth will enable corresponding levels of

# 8 Matrices with Appraisal of Housing Target Alternatives



Option: 2: 350 new homes each year						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
	healthy travel networks.					investment in walking and cycling routes and improving road junctions where necessary.
12. Health	Support active travel and deliver good quality, open green space, particularly in areas of less affluence; support health and independence in old age and ensure adequate health infrastructure.	This option will deliver opportunities for delivering improved health infrastructure, including new opportunities for walking and cycling. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments.	+	+	++	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> Permanent <b>Assumptions made:</b> Investment in new infrastructure keeps pace with growth.
13. Access	Journey lengths to key services and facilities to be minimised.	This option will deliver slightly more investment opportunities than under option 1 to help ensure improved accessibility to services and facilities. It is recognised that in all sub-areas there are severe limitations to the highways network that require significant investment to rectify - constraints to growth that are unlikely to be overcome during the plan period. In particular the main road connections between High Peak and Greater Manchester and Sheffield along the A6, A57 and	?	?	?	<b>Likelihood / certainty:</b> Unknown <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Investment in new infrastructure keeps pace with growth.

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SA Objective	Option: 2: 350 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
		A628. Evidence supporting the Local Plan demonstrates how impact on the strategic road network will be managed under this option and the significance of any negative impacts will be less than under option 3.				
14. Community safety and cohesion	Support for mixed use developments, strong neighbourhood centres and active street frontages. Safety and crime prevention to be addressed by new development.	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and implementation of other policies.	?	?	?	<p><b>Likelihood / certainty:</b> Uncertain Local Plan area</p> <p><b>Temporary/permanent:</b> permanent</p> <p><b>Assumptions made:</b></p>
15. Homes for all	Need to increase the number of affordable homes, especially in Glossopdale; and ensure provision of extra care / sheltered housing to meet needs of older people.	Given that this option is the upper end of the range for objectively assessed need, it will have a direct and significantly positive impact on this SA objective. Meeting this target will go further than option 1 towards addressing the needs of an ageing population and meeting assessed affordable housing need. This will have positive impacts on addressing the issue of affordability, the need to reduce the housing waiting list and help to meet pent up demand, as well as helping to demonstrate	++	++	++	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area</p> <p><b>Temporary/permanent:</b> permanent</p> <p><b>Assumptions made:</b> This option will go further than option 1 towards meeting the objectively assessed housing need of the plan area.</p>

# 8 Matrices with Appraisal of Housing Target Alternatives



SA Objective	Option: 2: 350 new homes each year					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
16. Leisure and recreation	Support provision of locally accessible opportunities for physical activity and other cultural and leisure activities; also provide new allotment space and other opportunities for community food growing.	compliance with the NPPF's requirements on meeting affordable housing need.  This option will deliver opportunities to invest in provision of locally accessible opportunities for leisure and recreation. Effects will be marginally more positive than under option 1.	+	+	+	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Investment in new infrastructure keeps pace with growth.
<p><b>Summary of significant effects:</b></p> <p>This option proposes the delivery of 350 new dwellings per year. This would provide a significant boost for the supply of housing in the plan area as it exceeds the past average rate of housing delivery (287dpa). A target of 350dpa would have a direct, long-term, positive effect on the SA objective to provide homes for all since it represents the upper end of the May 2015 range for objectively assessed housing need. Meeting this target will go further than option 1 towards addressing the needs of an ageing population and meeting assessed affordable housing need. This will have positive impacts on addressing the issue of affordability and the need to reduce the housing waiting list. This option also offers significant positive effects for economic development with an estimated net increase of 469 jobs and stabilisation of the work force. This option has potential for significant, indirect, minor positive effects on SA objectives relating to sustainable transport, health, and leisure and recreation. There are minor negative effects predicted on SA objectives relating to congestion, biodiversity, protection of sites designated for nature conservation (including European sites) and landscape character and natural assets.</p>						

1. High Peak Housing Needs Study 2012-based SNHP Update; May 2015, NLP



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2. Derbyshire Wildlife Trust, personal communication, 03/02/14
3. Submission version Habitats Regulations Assessment, ENVIRON, March 2014
4. High Peak Local Plan Landscape Impact Assessment, Wardell Armstrong, January 2014

## 8 Matrices with Appraisal of Housing Target Alternatives

**Table 8 Assessment Table for Scenario: Objectively Assessed Need using 2011-based SNPP (Council's current [May 2015] OAN): Housing Target Option 3**

SA Objective		Option: 3: 420 new homes each year					Justification for assessment
		Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
1. Economic development	Economic growth to be supported, with a more balanced employment distribution by sector. Supply of suitable employment land required.	As at May 2015, this target is higher than the upper end of the recommended OAN range. Whilst the Housing Needs Update May 2015 did not consider a scenario that gave rise to an annual development rate above 352dpa, it may be assumed that at 420dpa there would be an increase in the working age population to underpin job growth. Consequently there would be a directly positive impact on economic development.	+	++	++	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> A local labour supply will help to deliver economic growth across the plan area.	
2. Town Centres	Need to maintain and enhance vitality and viability of High Streets and town and village centres.	High Streets and town and village centres are predicted to benefit from an increase in local population, through an increase in spending in the local economy.	+	++	++	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Residents of new developments will use their local centres where appropriate.	
3. Tourism	Strength of visitor economy to be supported and maintained.	Effect is uncertain. Depending on the location of development and the implementation of other policies, a negative impact on tourism is possible through impacts on congestion, landscape and	?	?	?	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Growth will require development in areas of	



# 8 Matrices with Appraisal of Housing Target Alternatives

Option: 3: 420 new homes each year						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
		townscapes. Any such negative impacts would be most significant under this option.				landscape value, potentially including in the Green Belt. An impact on the setting of the Peak District National Park is likely. Overall this may make the area less attractive to visitors.
4. Pollution	Detrimental impact on existing areas of poor air quality - along A628 - to be avoided. Development to take into account impacts on air quality and noise and from artificial light.	Effect is uncertain, but negative overall. Whilst growth at this level is predicted to lead to an increase in traffic, including along the A628, and to an increase in congestion, improving car technology may mean that there are no long term significant negative effects on air quality. Increases in noise and light pollution will result. Effects will be more significant, than under other options considered.	-	-	?	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Growth at this level will lead to a significant increase in the number of car journeys made in the plan area. Even with policies in the Local Plan to control pollution, growth will result in an increase in congestion, noise and light pollution.
5. International, national, local wildlife sites	Need to protect designated sites, optimise their condition and improve their connectivity.	This option risks significant negative effects on designated sites. 9.47% of the plan area is designated as either a European site, SSSI, LNR or LWS. <sup>(1)</sup> Of particular concern are the likely urban effects on European	-	--	--	<b>Likelihood / certainty:</b> Unknown <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b>



# 8 Matrices with Appraisal of Housing Target Alternatives

Option: 3: 420 new homes each year						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
6. Biodiversity	Aim to achieve a net gain for biodiversity and enhanced natural networks.	<p>sites - effects identified in the HRA Report<sup>(2)</sup>. These effects result from development within the zone of influence of European sites and result in adverse impacts on the integrity of such sites.</p> <p>This option risks significant negative effects on biodiversity and natural networks as the Council has been unable to identify sufficient sites to meet the target, avoiding adverse impact to landscape character, the Peak Park and the Green Belt. This option is anticipated to result in the greatest potential loss of biodiversity of all options considered and presents the most significant risk to the integrity of European sites, even given implementation of other policies.</p>	-	--	--	<p>Policies in the Local Plan will seek to provide protection for designated sites, but a level of growth above that currently identified in the Local Plan will mean identifying further housing sites in the countryside, potentially in the Green Belt and within the zone of influence of European sites.</p> <p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area  <b>Temporary / permanent:</b> permanent  <b>Assumptions made:</b> Housing development at this scale risks a net loss of biodiversity. Sites designated for wildlife or habitat value will be put at risk. Development of ecological networks will be put at risk.</p>

# 8 Matrices with Appraisal of Housing Target Alternatives

		Option: 3: 420 new homes each year				Justification for assessment
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
7. Energy and climate change	Need to reduce carbon emissions and deal with the impacts of climate change.	Of all options considered, this option will result in the largest overall increase in carbon emissions from energy use associated with new development and associated car journeys. Sites in less sustainable locations will be required, increasing the number of car journeys made. Meeting this target is also more likely to lead to development that increases the risk of flooding elsewhere, when compared with other options.	-	--	--	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area</p> <p><b>Temporary / permanent:</b> permanent</p> <p><b>Assumptions made:</b> Even if individual properties are built to high environmental performance standards, the total increase in dwellings and car journeys will increase energy use.</p>
8. Townscape and heritage assets	Historic and cultural elements that contribute to the character and appearance of individual towns and villages to be protected and enhanced.	The effect of this is uncertain as it will depend on the location of development and implementation of other policies. However the Council has been unable to identify sufficient sites to meet this target, avoiding putting historic and cultural elements and their settings at risk. This option presents the greatest risk to overall townscape quality from inappropriate development.	?	?	--	<p><b>Likelihood / certainty:</b> uncertain</p> <p><b>Geographical scale:</b> Local Plan area</p> <p><b>Temporary / permanent:</b> permanent</p> <p><b>Assumptions made:</b> The higher the housing target, the more development sites that are required, and the greater the risk that development will come forward on a site that impacts on the setting of an asset, or overall townscape quality is reduced by scale of new development.</p>

# 8 Matrices with Appraisal of Housing Target Alternatives



Option: 3: 420 new homes each year						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
9. Landscape character and natural assets	Need to protect and reinforce landscape character to maintain and strengthen local distinctiveness and sense of place. New development to conserve and enhance cultural landscape assets as well as other natural assets including water courses and ancient woodlands.	This option risks significant negative effects on landscape character and natural assets. The SHLAA has identified potential sites within and on the edge of market towns and larger villages to accommodate growth, but much is within Green Belt or on sites unlikely to be deliverable within the plan period. The LIA <sup>(3)</sup> has identified much of the surrounding countryside as having significant landscape value and identified limited scope to amend Green Belt boundaries. 31% of the Plan area is designated Green Belt. This option will also require development within the buffer of the National Park.	-	--	--	<b>Likelihood / certainty:</b> possible <b>Geographical scale:</b> Local Plan area and National Park <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> This scale of growth will require development in areas of significant landscape value, including in the Green Belt and within the buffer of the Peak District National Park. An impact on the setting of the Peak District National Park, loss of Green Belt and high quality landscape could not be avoided. Adverse impacts on natural assets will also be unavoidable.
10. Flood risk	New development to be located in flood zone 1. Water efficiency measures to be supported and SuDS required. Minimise discharge of phosphates into River Wye and support other water quality objectives.	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and implementation of other policies. However meeting this target requires development on sites that result in a greater overall risk of flooding. There is uncertainty over whether this level of growth could be delivered in Buxton without adverse impact on the integrity of the Peak District Dales	?	--	--	<b>Likelihood / certainty:</b> Unknown <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> This scale of growth will require development in areas of significant landscape value, including in the Green Belt and within the buffer of the Peak District National Park, creating a greater risk of surface water

# 8 Matrices with Appraisal of Housing Target Alternatives

Option: 3: 420 new homes each year						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
		SAC through phosphate discharges into the River Wye from the Buxton STW.				flooding. High levels of growth in Buxton risk continued meeting of water quality conservation objectives in the River Wye set under the Habitats Regulations.
11. Sustainable transport	Locate new development in areas allowing choice of sustainable travel modes and good road network. Improve healthy travel networks.	This option presents the most investment opportunities to improve facilities for sustainable transport. However, in order to meet the target, housing sites at distance from town and village centres will be required. Unless investment in healthy travel networks is made, more car journeys will result.	+/-	?/-	?/-	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Highest level of housing growth will enable highest level of investment in walking and cycling routes and improving road junctions where necessary.
12. Health	Support active travel and deliver good quality, open green space, particularly in areas of less affluence; support health and independence in old age and ensure adequate health infrastructure.	This option will deliver most housing growth and thus most opportunities for investment in improved health infrastructure, including new opportunities for walking and cycling. There is a balance between loss of countryside as a result of development and provision of new, accessible open space as part of new developments.	+	++	++	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> Permanent <b>Assumptions made:</b> Investment in new infrastructure keeps pace with growth.
13. Access	Journey lengths to key services and facilities to be minimised.	This option will deliver the most housing growth and thus the most opportunity for investment in new	?	?	?	<b>Likelihood / certainty:</b> unknown <b>Geographical scale:</b> Local Plan area <b>Temporary /</b>

# 8 Matrices with Appraisal of Housing Target Alternatives



Option: 3: 420 new homes each year						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
		services and facilities that lead to improved accessibility. However It is recognised that in all sub-areas there are severe limitations to the highways network that require significant investment to rectify - constraints to growth that are unlikely to be overcome during the plan period. In particular the main road connections between High Peak and Greater Manchester and Sheffield along the A6, A57 and A628. This target risks leading to severe congestion and significant negative impacts on this SA objective.				<b>permanent Assumptions made:</b> Investment in new infrastructure keeps pace with growth.
14. Community safety and cohesion	Support for mixed use developments, strong neighbourhood centres and active street frontages. Safety and crime prevention to be addressed by new development.	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and implementation of other policies.	?	?	?	<b>Likelihood / certainty:</b> uncertain Local Plan area <b>Temporary/permanent Assumptions made:</b> permanent
15. Homes for all	Need to increase the number of affordable homes, especially in Glossopdale; and	Given that this option is above the upper end of the revised range for objectively assessed need, it will have a direct and significantly positive	++	++	++	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary/permanent Assumptions</b>

# 8 Matrices with Appraisal of Housing Target Alternatives

SA Objective	Option: 3: 420 new homes each year					Justification for assessment
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
	ensure provision of extra care / sheltered housing to meet needs of older people.	impact on this SA objective. There is a critical need for 878 (net) affordable homes annually over the next five years across the Borough (ie wider than the plan area) <sup>(4)</sup> . This option will go furthest towards meeting this need, to improving affordability and to stabilising increasing house prices.				<b>made:</b> The market is able to deliver new homes to meet this target.
16. Leisure and recreation	Support provision of locally accessible opportunities for physical activity and other cultural and leisure activities; also provide new allotment space and other opportunities for community food growing.	There is uncertainty as to the nature of the effect and level of significance as this will be dependent on the location of development and implementation of other policies. Whilst this option will deliver the most housing growth and thus the most opportunity to invest in provision of locally accessible opportunities for leisure and recreation, meeting the target may result in the loss of existing recreation sites.	?	?	?	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> Investment in new infrastructure keeps pace with growth.
<b>Summary of significant effects:</b>						
This option proposes the delivery of 420 new dwellings per year. If sufficient NPPF compliant, deliverable and developable sites can be found to deliver the requirement, it will have a direct, significant, long-term, positive effect on the SA objective to provide homes for all, it will enable demographically generated demand to be met; affordability challenges and the housing waiting list to be addressed and pent up demand to be met. The option will have the most direct and significant long-term positive effect on economic development, in particular jobs growth. Similarly this option has potential for a more significant, indirect, minor positive effect on SA objectives relating to sustainable transport, health, and leisure and recreation, than all other options, albeit some of these effects						

# 8 Matrices with Appraisal of Housing Target Alternatives



SA Objective	Option: 3: 420 new homes each year					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
	<p>are uncertain. However this option, compared with all others, has the potential for the greatest and most significant negative effects on SA objectives relating to congestion, biodiversity, protection of sites designated for nature conservation (including European sites) and landscape character and natural assets. Loss of Green Belt, net loss of biodiversity and significant impacts on the landscape quality of the Borough and on the setting of the Peak District National Park are anticipated. Impacts on the highways network also risks severe adverse effects.</p>					

1. Derbyshire Wildlife Trust, personal communication, 03/02/14
2. Submission version Habitats Regulations Assessment, ENVIRON, March 2014
3. High Peak Local Plan Landscape Impact Assessment, Wardell Armstrong, January 2014
4. High Peak Housing Needs Study 2012-based SNHP Update; May 2015; NLP

## 9 Sustainability implications of proposed Main Modifications

**9.1** This section sets out the proposed Main Modifications in full and assesses whether the modification has been appraised through earlier stages of the sustainability appraisal process and whether an additional appraisal is required.

**9.2** In table 9 below, text recommended for deletion is shown as being ~~struck through~~ and new text recommended for insertion is shown as underlined.

# 9 Sustainability implications of proposed Main Modifications



**Table 9 Sustainability implications of proposed modifications**

Ref:	Local Plan ref.	Main modification	Sustainability implications
	<p>Page 34 Para. 4.48</p>	<p>4.48 The 2014 Strategic Housing Market Assessment (SHMA) considered a range of alternative scenarios for establishing the Borough's objectively assessed need (OAN) and has recommended an OAN range of between 420 and 470. <u>The 2015 High Peak Housing Needs Study 2012-based SNHP Update was prepared to take account of the 2012-based household projections and recommended a new range of 310-350 new dwellings per year over the plan period. This is equivalent to 8,400 to 9,400 6200 to 7000 dwellings over the plan period. Taking into account the need for affordable housing and the aim of promoting economic growth within the Plan area the housing requirement is 350 dwellings per year.</u></p>	<p>This reflects the findings of the updated Housing Needs Study and supports a revised housing target. There are widespread sustainability implications arising from a recommendation to change the target number of new homes to be delivered over the plan period.</p> <p>Separate appraisal needed? <b>Yes</b> (see section 8 for full assessment).</p>
	<p>Page 35 Para. 4.53</p>	<p>4.53 Using this evidence the Council has explored and assessed all available suitable sites within the plan area and has made provision within the Local Plan for the maximum number of sites which it considers can be accommodated. This evidence has been used to establish <u>a an alternative housing target that there is sufficient land for of 360 350 dwellings per annum, which can be delivered and reflects the identified infrastructure and environmental constraints. A Sustainability Appraisal Addendum (SA) has also been undertaken of reasonable alternatives from the SHMA for a housing target and the findings of this SA have helped to inform the selection of 360pa 350 as the preferred option. The SA has assessed the anticipated consequences, in social, economic and environmental terms, of alternative levels of housing provision and concludes that alternatives above 360 350 dwellings per annum would have more significant consequences for the Borough and adjoining areas.</u></p>	<p>The revised wording is a factual update for clarification. There are no implications for the sustainability objectives from the update to this paragraph. Implications of the revised housing target have been subject to sustainability appraisal, see section 8.</p> <p>Separate appraisal needed? <b>No</b></p>

# 9 Sustainability implications of proposed Main Modifications

Ref:	Local Plan ref.	Main modification	Sustainability implications											
	<p>Page 36 Para. 4.54</p> <p>4.54 A target of <u>360 350</u> dwellings per annum would generate a need for <u>7,200 7000</u> new dwellings over the plan period. Table 2 below shows the net requirement to be identified in the plan on new sites after taking account of past completions, current commitments, shortfall since 2006 and the Peak District National Park contribution.</p> <p><b>Table 2 Net Housing Requirement</b></p> <table border="1" data-bbox="598 840 1177 1653"> <thead> <tr> <th data-bbox="598 1249 699 1653">Housing Target (2011 - 2031)</th> <th data-bbox="598 840 699 1249">7,200 7000 dwellings</th> </tr> </thead> <tbody> <tr> <td data-bbox="699 1249 794 1653">Completions (2011 - 2013)</td> <td data-bbox="699 840 794 1249">-309 445 dwellings</td> </tr> <tr> <td data-bbox="794 1249 938 1653">Commitments (as at March 2014) comprises of sites with planning permission, under construction and other deliverable sites</td> <td data-bbox="794 840 938 1249">-2,022 2976 dwellings</td> </tr> <tr> <td data-bbox="938 1249 1050 1653">Peak District National Park contribution (2011 - 2031)</td> <td data-bbox="938 840 1050 1249">- 110 dwellings</td> </tr> <tr> <td data-bbox="1050 1249 1114 1653">Shortfall in housing provision since 2006</td> <td data-bbox="1050 840 1114 1249">+ 80 dwellings</td> </tr> <tr> <td data-bbox="1114 1249 1177 1653"><b>Net housing requirement</b></td> <td data-bbox="1114 840 1177 1249"><b>4,839 3549 dwellings</b></td> </tr> </tbody> </table>	Housing Target (2011 - 2031)	7,200 7000 dwellings	Completions (2011 - 2013)	-309 445 dwellings	Commitments (as at March 2014) comprises of sites with planning permission, under construction and other deliverable sites	-2,022 2976 dwellings	Peak District National Park contribution (2011 - 2031)	- 110 dwellings	Shortfall in housing provision since 2006	+ 80 dwellings	<b>Net housing requirement</b>	<b>4,839 3549 dwellings</b>	<p>The revised text is a factual update for clarification. There are no implications for the sustainability objectives from the update to this paragraph. Implications of the revised housing target have been subject to sustainability appraisal, see section 8.</p> <p>Separate appraisal needed? <b>No</b></p>
Housing Target (2011 - 2031)	7,200 7000 dwellings													
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<b>Net housing requirement</b>	<b>4,839 3549 dwellings</b>													
Page 36 Para. 4.55	<p>4.55 The housing target of <u>360 350</u> dwellings per annum exceeds the past average rate of housing delivery and therefore is boosting housing growth in accordance with the NPPF and will help meet the considerable unmet affordable housing need of the Borough. It will also meet the economic growth forecasts evidenced in the Employment Land Review Update <u>and create additional jobs.</u></p>	<p>The revised text is a factual update for clarification. There are no implications for the sustainability objectives from the update to this paragraph. Implications of the revised housing target - including</p>												

## 9 Sustainability implications of proposed Main Modifications



Ref:	Local Plan ref.	Main modification	Sustainability implications
			<p>in relation to job creation - have been subject to sustainability appraisal, see section 8.</p> <p>Separate appraisal needed? <b>No</b></p>
Page 36 Para. 4.56	<p>4.56 However, the fact that the Local Plan's housing target does not match the objectively assessed full housing requirement means that there is a 'duty to cooperate' with the Borough's neighbouring local authorities. High Peak's strategic housing market and travel to work area extends primarily westwards incorporating Cheshire East, Tameside and Stockport and, to a lesser extent, eastwards incorporating parts of Derbyshire Dales and Sheffield. Many of these areas also face similar challenges in meeting housing requirements. In accordance with government guidance, the Council has been engaging constructively, actively and on an ongoing basis with these neighbouring authorities with regard to addressing any shortfall to ensure the full objectively assessed needs of High Peak can be met (see para. 4.75 below for further information).</p>	<p>The revised text is a factual update for clarification. There are no implications for the sustainability objectives from the update to this paragraph.</p> <p>Separate appraisal needed? <b>No</b></p>	
Page 37 Para. 4.61	<p>4.61 Neighbourhood Plans are required to be in conformity with the Local Plan and will be expected to make a contribution towards meeting the needs of High Peak. Currently a Neighbourhood Plan is being prepared for Chapel Parish in the Central Area. The Consultation version of the Chapel Neighbourhood Plan allocates land for 42 new homes (policy H1). In addition there were commitments on a further 843 926 dwellings as at February 2013 December 2014. It is proposed therefore to set a requirement for the Chapel Neighbourhood Plan to deliver 850 dwellings over the plan period (2011 - 2031). This is a minimum requirement which allows for further growth to help meet the needs of the Borough.</p>	<p>The revised text is a factual update for clarification. There are no implications for the sustainability objectives from the update to this paragraph.</p> <p>Separate appraisal needed? <b>No</b></p>	

# 9 Sustainability implications of proposed Main Modifications

Ref:	Local Plan ref.	Main modification	Sustainability implications
	<p>Page 38</p> <p>Paras. 4.64 - 4.67</p>	<p><b>Gross-boundary Housing Provision</b></p> <p>4-64 Through the Duty to Cooperate, the authority is exploring with neighbouring authorities which fall within the same Housing Market Area the extent to which such authorities could assist in meeting the full objectively assessed housing need of High Peak. The outcome of these discussions is that Cheshire East is in a position to be able make some provision to assist in meeting the needs of High Peak during the plan period.</p> <p>4-65 The authority has strong migration and commuting linkages with High Peak and a desire to mitigate the impact of housing in High Peak on their areas and the Peak District National Park. East Cheshire Council also recognises that previous housing restraint policies have probably directed some residential development to High Peak. Associated with this are transport movements in the A6 corridor, which are causing severe traffic congestion that is likely to be further exacerbated by additional development in High Peak.</p> <p>4-66 In view of these synergies between High Peak and Cheshire East, it is considered appropriate to provide for part of High Peak's housing requirement to be met in Cheshire East. The Cheshire East Local Plan Strategy which has recently been approved for publication and submission does therefore make provision in policy PG1 for up to 500 homes to assist in meeting the housing needs of High Peak during 2020 - 2030.</p> <p>4-67 A Memorandum of Understanding with Cheshire East Council will set out the number of dwellings to be delivered within their respective boundaries and the phasing for their delivery.</p>	<p>The deletion of text is for accuracy and clarification. There are no implications for the sustainability objectives from the deletion of these paragraphs.</p> <p>Implications of the deletion from Policy S3 of text relating to cross boundary housing provision has been subject to sustainability appraisal, see below.</p> <p>Separate appraisal needed? <b>No</b></p>



# 9 Sustainability implications of proposed Main Modifications

Ref:	Main modification	Sustainability implications																		
<p>Pages 38 - 40 Policy S3</p>	<p><b>Policy S3</b> <b>Strategic Housing Development</b> <b>Housing Land Supply and Distribution</b></p> <p>Provision will be made for at least <del>7,200</del> <u>7,000</u> dwellings over the period 2011-2031 at an overall average annual development rate of <del>360</del> <u>350</u> dwellings.</p> <p>In order to meet this requirement sufficient land will be identified to accommodate up to <del>4,839</del> <u>3,549</u> additional dwellings on new sites. This will be distributed across the Borough broadly as follows:</p> <table border="1" data-bbox="742 855 1045 1881"> <thead> <tr> <th>Sub-Area</th> <th>% of Borough Total</th> <th>No. of Dwellings on new sites</th> </tr> </thead> <tbody> <tr> <td>Glossopdale</td> <td>27-35%</td> <td><del>4,307</del> <u>1,694</u> <del>958</del> - <u>1,242</u></td> </tr> <tr> <td>Central</td> <td>30-33%</td> <td><del>4,452</del> <u>1,597</u> <del>1,065</del> - <u>1,171</u></td> </tr> <tr> <td>Buxton</td> <td>32-43%</td> <td><del>4,548</del> <u>2,084</u> <del>1,136</del> - <u>1,526</u></td> </tr> </tbody> </table> <p>This will be met from large sites allocated in policy H3 and in the Chapel-en-le-Frith Neighbourhood Plan and from small sites which accord with policy H1 as follows:</p> <table border="1" data-bbox="1225 855 1396 1881"> <thead> <tr> <th colspan="2">How the Requirement will be met on new sites</th> </tr> <tr> <th>Sub-area</th> <th>Number of Dwellings on new sites</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Sub-Area	% of Borough Total	No. of Dwellings on new sites	Glossopdale	27-35%	<del>4,307</del> <u>1,694</u> <del>958</del> - <u>1,242</u>	Central	30-33%	<del>4,452</del> <u>1,597</u> <del>1,065</del> - <u>1,171</u>	Buxton	32-43%	<del>4,548</del> <u>2,084</u> <del>1,136</del> - <u>1,526</u>	How the Requirement will be met on new sites		Sub-area	Number of Dwellings on new sites			<p>Modifications proposed to this Policy reflect the findings of the updated Housing Needs Study and support a revised housing target. There are widespread sustainability implications arising from a recommendation to change the target number of new homes to be delivered over the plan period.</p> <p>In addition, it is proposed to delete text referring to a provision to be made by Cheshire East to accommodate up to 500 dwellings during the period 2020 to 2030 on behalf of the Borough. This modification may have implications for the sustainability objectives.</p> <p>Separate appraisal needed? <b>Yes</b></p> <p>See section 8 for full assessment of housing target alternatives.</p> <p>See section 10 for assessment of the implications of deleting the proposed cross boundary housing provision.</p>
Sub-Area	% of Borough Total	No. of Dwellings on new sites																		
Glossopdale	27-35%	<del>4,307</del> <u>1,694</u> <del>958</del> - <u>1,242</u>																		
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How the Requirement will be met on new sites																				
Sub-area	Number of Dwellings on new sites																			

# 9 Sustainability implications of proposed Main Modifications

Ref:	Local Plan ref.	Main modification	Sustainability implications
		<b>How the Requirement will be met on new sites</b>	
		<b>Glossopdale</b>	
		- Glossop Small Sites	250
		- Villages Small Sites	150
		- Allocations	<del>907</del> - <del>1,294</del> <u>558</u> - <u>842</u>
		<b>TOTAL TARGET PROVISION</b>	<del>1,307</del> - <del>1,694</del> <u>958</u> - <u>1,242</u>
		<b>Central Area</b>	
		- Chapel Neighbourhood Plan Small Sites	100
		- New Mills Small Sites	100
		- Whaley Bridge Small Sites	100
		- Villages Small Sites	100
		- Allocations (excluding Chapel Parish)	<del>1,052</del> - <del>1,197</del> <u>623</u> - <u>729</u>
		<b>TOTAL TARGET PROVISION</b>	<del>4,452</del> - <del>4,597</del> <u>1,065</u> - <u>1,171</u>
		<b>Buxton</b>	
		- Buxton Small Sites	300

# 9 Sustainability implications of proposed Main Modifications



Ref:	Local Plan ref.	Main modification	Sustainability implications						
		<p><b>How the Requirement will be met on new sites</b></p> <table border="1"> <tr> <td>- Villages Small Sites</td> <td>100</td> </tr> <tr> <td>- Allocations</td> <td>1,148 - <del>1,684</del> 736 - 1,126</td> </tr> <tr> <td><b>TOTAL TARGET PROVISION</b></td> <td><b>4,548 - <del>2,084</del> 1,136 - 1,526</b></td> </tr> </table>	- Villages Small Sites	100	- Allocations	1,148 - <del>1,684</del> 736 - 1,126	<b>TOTAL TARGET PROVISION</b>	<b>4,548 - <del>2,084</del> 1,136 - 1,526</b>	
- Villages Small Sites	100								
- Allocations	1,148 - <del>1,684</del> 736 - 1,126								
<b>TOTAL TARGET PROVISION</b>	<b>4,548 - <del>2,084</del> 1,136 - 1,526</b>								
		<p>The release of land/sites for new housing will be managed so that it delivers the broad amount and distribution of housing as set out above. The adequacy of housing delivery (in terms of a five year supply of housing and in meeting planned housing delivery targets over the full plan period) will be assessed regularly in accordance with a Housing Implementation Strategy and through annual reviews of the Strategic Housing Land Availability Assessment. Progress will be reported through the council's Authority Monitoring Report.</p> <p><b>Neighbourhood Plans</b></p> <p>In order to assist in meeting the full objectively assessed housing need of the plan area Neighbourhood Plans should maximise opportunities for housing growth in sustainable locations and, where appropriate, make allocations in their plan.</p> <p>For the Chapel Neighbourhood Plan a minimum of 850 dwellings should be delivered over the plan period in addition to the small sites allowance but this may be exceeded to help meet the needs of the Borough.</p> <p><b>Gross-boundary Housing Provision</b></p>							

# 9 Sustainability implications of proposed Main Modifications

Ref:	Local Plan ref.	Main modification	Sustainability implications												
		<p>In addition to the above provision, the Council is working with adjoining authorities to provide sufficient housing during the plan period to assist in meeting the full objectively assessed housing need of High Peak:</p> <p>In Cheshire East provision will be made for up to 500 dwellings during the period 2020 to 2030 at an average of 50 dwellings each year.</p> <p>The mechanisms for delivery of any housing within those authorities to meet some of the needs of High Peak will be set out in a joint Memorandum of Understanding to be agreed between High Peak and Cheshire East Council.</p>													
<p>Page 112</p> <p>Policy H3</p>	<p><b>Policy H3</b></p> <p><b>Housing Allocations</b></p> <p>The following sites will be allocated for housing or mixed use development. The Council will work with developers and the local community to bring forward sustainable developments in accordance with the other policies in the Local Plan.</p> <p><b>Glossopdale</b></p> <table border="1" data-bbox="1177 853 1485 1879"> <thead> <tr> <th>Location</th> <th>No of dwellings</th> <th>Phase</th> </tr> </thead> <tbody> <tr> <td>Paradise Street Hadfield (G2)</td> <td>28</td> <td>M</td> </tr> <tr> <td>Roughfields Hadfield (G3)</td> <td>102</td> <td>M</td> </tr> <tr> <td>North Road (G6)</td> <td>450</td> <td>E</td> </tr> </tbody> </table>	Location	No of dwellings	Phase	Paradise Street Hadfield (G2)	28	M	Roughfields Hadfield (G3)	102	M	North Road (G6)	450	E	<p>Modifications proposed to this Policy reflect the findings of a Heritage and Landscape Appraisal of housing land allocation at Woodhead Road, Glossop, implications of Ashwood Dale Quarry and its potential extension on the Housing allocation West of Tongue Lane, Buxton and updated planning permissions.</p> <p>There are sustainability implications arising from the proposed combined loss of 197 homes to the projected housing supply.</p> <p>Separate appraisal needed? <b>Yes</b></p> <p>See section 8 for full assessment of housing target alternatives.</p>	
Location	No of dwellings	Phase													
Paradise Street Hadfield (G2)	28	M													
Roughfields Hadfield (G3)	102	M													
North Road (G6)	450	E													

# 9 Sustainability implications of proposed Main Modifications



Ref:	Local Plan ref.	Main modification	Sustainability implications					
			See section 10 for assessment of the implications of amended housing site allocations.					
						Location	No of dwellings	Phase
						Land off Woodhead Rd (G8, G9, G10, G11 [Policy DS-6])	424	E
						Bute Street (G12)	30	M
						Hawkshead Mill Old Glossop (G13)	31	E
						Woods Mill High St East* (G16)[Policy DS1]	104	M
						Dinting Road/Dinting Lane (G19)	64	E
						Dinting Lane (G20) [Policy DS2]	50	M
						Former railway museum (G23)[Policy DS2]	89	L
						Land off Melandra Castle Road(G25)	35	M
						Land adj to Gamesley Sidings(G26)	38	M
						Charlestown Works Glossop*(G31) [Policy DS3]	400	E
						Adderley Place (G32) [Policy DS4]	130	M
						<b>TOTAL PROVISION ON ALLOCATED SITES</b>	<b>4072 701</b>	
			<b>Central</b>					

# 9 Sustainability implications of proposed Main Modifications

Ref:	Local Plan ref.	Main modification	Sustainability implications		
			Location	No of dwellings	Phase
		Derby Road New Mills (C3) [Policy DS7]	107	M	
		Ollersett Lane / Pingot Road / Laneside Road New Mills (C5, C6, C17, C18) [Policy DS8]	239	M/L	
		Woodside Street New Mills (C7)	25	E	
		South of Macclesfield Road (C9)	83	E	
		Buxton Road Chinley (C13)	13	E	
		Britannia Mill* (C15) [Policy DS9]	50	E	
		Furness Vale A6 (C16)	39	E	
		Furness Vale Business Park*(C19) [Policy DS11]	26	L	
		New Mills, Newtown* (C20) [Policy DS13]	15	M	
		Birch Vale Industrial Estate* (C21) [Policy DS14]	100	M	
		<b>TOTAL PROVISION ON ALLOCATED SITES</b>	<b>744</b>	<b>697</b>	
		<b>Buxton</b>			

# 9 Sustainability implications of proposed Main Modifications



Ref:	Local Plan ref.	Main modification	Sustainability implications		
			Location	No of dwellings	Phase
		Batham Gate Road Peak Dale (B1)	25	E	
		Land at Hogshaw Buxton (B3,B4) [Policy DS15]	124	L	
		Hardwick Square South Buxton (B6)	30	E	
		Market Street Depot Buxton (B7)	24	E	
		West of Tongue Lane Fairfield Buxton (B8) [Policy DS16]	245 <u>139</u>	L	
		Land off Dukes Drive Buxton (B10) [Policy DS17]	338	M	
		Foxlow Farm, Ashbourne Road, Buxton (B20, B21,B22) [Policy DS18]	440 <u>0</u>	E/M	
		Harpur Hill College campus (B27)	105	E	
		Station Road, Buxton (B31) [Policy DS20]	30	M	
		<b>TOTAL PROVISION ON ALLOCATED SITES</b>	<b>4334 <u>815</u></b>		
<p>Sites marked * are industrial legacy sites identified in policy E5 for redevelopment including housing</p> <p>Sites with [Policy DS] refer to Strategic Development Sites policies</p>					

## 10 Matrices with appraisal of proposed Main Modifications

**10.1** The tables below record the full appraisal findings of those proposed Main Modifications screened as requiring further assessment. This is the second stage of the two stage process described in paragraphs 3.16 - 3.17 of this Addendum Report.

**Table 10 Key to scoring of options**

Score	
++	The policy will have a very positive impact on the sustainability objective
+	The policy will have a slightly positive impact on the sustainability objective
0	The policy will have a negligible or neutral impact on the sustainability objective. A recorded neutral effect does not necessarily mean that there will be no effect at the project level, but shows that at this strategic level there are no identifiable effects.
-	The policy will have a slightly negative impact on the sustainability objective
--	The policy will have a very negative impact on the sustainability objective
i	The outcome of implementing the policy could be dependent upon implementation, or more detail is required to make an assessment
?	The impact of an issue cannot be predicted at this stage

**10.2** Different components within an option may generate varying impacts. This is indicated by "/"

### **Key to table**

ST: Short Term = 0 - 5 years

MT: Medium Term = 5 -10 years

LT: Long Term = over 10 years

## 10 Matrices with appraisal of proposed Main Modifications



Table 11 Assessment Table for modifications to Policy S3

SA Objective	Policy S3: Deletion of the proposed cross boundary housing provision					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
1. Economic development	Economic growth to be supported, with a more balanced employment distribution by sector. Supply of suitable employment land required.	Amendment reflecting that the Council is now in a position to meet its housing need within the plan area will not lead to any additional effects on this objective.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
2. Town Centres	Need to maintain and enhance vitality and viability of High Streets and town and village centres.	Amendment reflecting that the Council is now in a position to meet its housing need will not lead to any increase in growth in the plan area beyond that set out currently.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
3. Tourism	Strength of visitor economy to be supported and maintained.	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> Uncertain <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
4. Pollution	Detrimental impact on existing areas of poor air quality - along A628 - to be avoided. Development to take into account impacts on	Implications for cross boundary impacts arising from the numbers and routes of car journeys is uncertain as the location(s) of the 500	?/0	?/0	?/0	<b>Likelihood / certainty:</b> Uncertain; <b>Geographical scale:</b> Local Plan area; <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b>

# 10 Matrices with appraisal of proposed Main Modifications

Policy S3: Deletion of the proposed cross boundary housing provision						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
	air quality and noise and from artificial light.	homes to be accommodated in Cheshire East on the Council's behalf was not specified. However the modification will not lead to any increase in growth in the plan area beyond that set out currently.				The modification does not change the overall level of growth to be delivered in the plan area. The notional 500 on behalf of High Peak will still be delivered in Cheshire East, but no longer on behalf of this Council - instead as part of the overall growth meeting the need of Cheshire East.
5. International, national, local wildlife sites	Need to protect designated sites, optimise their condition and improve their connectivity.	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> Likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
6. Biodiversity	Aim to achieve a net gain for biodiversity and enhanced natural networks.	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.

## 10 Matrices with appraisal of proposed Main Modifications



SA Objective	Policy S3: Deletion of the proposed cross boundary housing provision					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
7. Energy and climate change	Need to reduce carbon emissions and deal with the impacts of climate change.	The modification will not lead to any increase in growth in the plan area beyond that set out currently.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
8. Townscape and heritage assets	Historic and cultural elements that contribute to the character and appearance of individual towns and villages to be protected and enhanced.	The modification will not lead to any increase in growth in the plan area beyond that set out currently.	0	0	0	<b>Likelihood / certainty:</b> possible <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
9. Landscape character and natural assets	Need to protect and reinforce landscape character to maintain and strengthen local distinctiveness and sense of place. New development to conserve and enhance cultural landscape assets as well as other natural assets including water courses and ancient woodlands.	The modification will not lead to any increase in growth in the plan area beyond that set out currently.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area and National Park <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
10. Flood risk	New development to be located in flood zone 1. Water efficiency measures	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> Unknown <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent

# 10 Matrices with appraisal of proposed Main Modifications

Policy S3: Deletion of the proposed cross boundary housing provision						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
	to be supported and SuDS required. Minimise discharge of phosphates into River Wye and support other water quality objectives.					permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
11. Sustainable transport	Locate new development in areas allowing choice of sustainable travel modes and good road network. Improve healthy travel networks.	Amendment reflecting that the Council is now in a position to meet its housing need within the Plan area will not lead to any change in the location or scale of new development.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
12. Health	Support active travel and deliver good quality, open green space, particularly in areas of less affluence; support health and independence in old age and ensure adequate health infrastructure.	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> Permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
13. Access	Journey lengths to key services and facilities to be minimised.	Amendment reflecting that the Council is now in a position to meet its housing need within the Plan area will not lead to any change in the location or scale of new development.	0	0	0	<b>Likelihood / certainty:</b> unknown <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.



# 10 Matrices with appraisal of proposed Main Modifications

Policy S3: Deletion of the proposed cross boundary housing provision						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
14. Community safety and cohesion	Support for mixed use developments, strong neighbourhood centres and active street frontages. Safety and crime prevention to be addressed by new development.	The amendment does not affect this objective.	0	0	0	<p><b>Likelihood / certainty:</b> Uncertain</p> <p><b>Geographical scale:</b> Local Plan area</p> <p><b>Temporary/permanent:</b> permanent</p> <p><b>Assumptions made:</b> The modification does not change the impact on this objective.</p>
15. Homes for all	Need to increase the number of affordable homes, especially in Glossopdale; and ensure provision of extra care / sheltered housing to meet needs of older people.	Amendment reflecting that the Council is now in a position to meet its housing need within the Plan area will not lead to any change in the overall number of homes being delivered in the plan area. The revised OAN range meaning that the Council can now meet identified housing need has a positive impact on this objective. The modification however relates to deletion of the reference to the proposed contribution of an additional 500 homes being accommodated in Cheshire East on behalf of High Peak since these are no longer required to help meet need.	?/0	?/0	?/0	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area</p> <p><b>Temporary/permanent:</b> permanent</p> <p><b>Assumptions made:</b> The modification does not change the overall level of growth to be delivered in the plan area. The notional 500 on behalf of High Peak will still be delivered in Cheshire East, but no longer on behalf of this Council - instead as part of the overall growth meeting the need of Cheshire East.</p>

# 10 Matrices with appraisal of proposed Main Modifications

Policy S3: Deletion of the proposed cross boundary housing provision						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
16. Leisure and recreation	Support provision of locally accessible opportunities for physical activity and other cultural and leisure activities; also provide new allotment space and other opportunities for community food growing.	The amendment does not affect this objective.	0	0	0	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area</p> <p><b>Temporary / permanent:</b> permanent</p> <p><b>Assumptions made:</b> The modification does not change the impact on this objective.</p>
<p><b>Summary of significant effects:</b></p> <p>No likely significant effects have been identified. The proposed modification will not result in any increase in the overall level of growth in High Peak, nor in the proposed locations of new homes in the plan area. An increase in growth is likely to take place in Cheshire East, with the modification resulting in all of those additional homes now contributing to meeting the needs of that Council. On this basis it is considered that the modification does not change the impacts previously identified on sustainability objectives.</p>						

# 10 Matrices with appraisal of proposed Main Modifications



**Table 12 Assessment Table for modifications to Policy H3**

SA Objective	Policy H3: Amendments to housing site allocations					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
1. Economic development	Economic growth to be supported, with a more balanced employment distribution by sector. Supply of suitable employment land required.	A combined loss of 197 homes to the projected housing supply over the 20 year plan period is not anticipated to have a significant impact on this objective.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective. The revised housing supply gives an annual average delivery rate of 350 new homes a year. This is the upper end of the revised OAN range and is expected to deliver significant positive effects for this objective.
2. Town Centres	Need to maintain and enhance vitality and viability of High Streets and town and village centres.	A combined loss of 197 homes to the projected housing supply over the 20 year plan period is not anticipated to have a significant impact on this objective.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> local plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
3. Tourism	Strength of visitor economy to be supported and maintained.	A combined loss of 197 homes to the projected housing supply over the 20 year plan period is not anticipated to have a significant impact on this objective.	0	0	0	<b>Likelihood / certainty:</b> Uncertain <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.

# 10 Matrices with appraisal of proposed Main Modifications

SA Objective	Policy H3: Amendments to housing site allocations					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
4. Pollution	Detrimental impact on existing areas of poor air quality - along A628 - to be avoided. Development to take into account impacts on air quality and noise and from artificial light.	Modification to reduce housing capacity of site B8 is designed to minimise any potential noise and vibration impacts associated with blasting at Ashwood Dale Quarry.	+	+	++	<p><b>Likelihood / certainty:</b> Likely;  <b>Geographical scale:</b> Buxton;  <b>Temporary / permanent:</b> permanent  <b>Assumptions made:</b> A buffer of 200m from the proposed extension to Ashwood Dale Quarry is an appropriate distance to separate blasting from proposed and existing housing. This is required to minimise noise and vibration impacts of blasting to acceptable levels. The planning application to extend Ashwood Dale Quarry is in preparation. The extension application will maintain a 200 metre separation distance between extraction and housing to accord with line "C"(1) on the plan and will adopt a blast vibration limit at sensitive buildings of 6mm/second at 95% confidence in order to reduce the probability of adverse comment.</p>
5. International, national, local wildlife sites	Need to protect designated sites, optimise their condition and improve their connectivity.	The amendment does not affect this objective.	0	0	0	<p><b>Likelihood / certainty:</b> Likely  <b>Geographical scale:</b> Local Plan area  <b>Temporary / permanent:</b> permanent  <b>Assumptions made:</b>                      The modification does not change the impact on this objective.</p>

## 10 Matrices with appraisal of proposed Main Modifications



Policy H3: Amendments to housing site allocations						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
6. Biodiversity	Aim to achieve a net gain for biodiversity and enhanced natural networks.	The amendment does not affect this objective.	0	0	0	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area</p> <p><b>Temporary / permanent:</b> permanent</p> <p><b>Assumptions made:</b> The modification does not change the impact on this objective.</p>
7. Energy and climate change	Need to reduce carbon emissions and deal with the impacts of climate change.	The amendment does not affect this objective.	0	0	0	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Local Plan area</p> <p><b>Temporary / permanent:</b> permanent</p> <p><b>Assumptions made:</b> The modification does not change the impact on this objective.</p>
8. Townscape and heritage assets	Historic and cultural elements that contribute to the character and appearance of individual towns and villages to be protected and enhanced.	Modification addresses the issues raised in the Heritage and Landscape Appraisal of land at Woodhead Road, Glossop <sup>(2)</sup> that found development of all of the sites contained within Policy DS6 would cause harm, to varying degrees, to the character and setting of Old Glossop Conservation Area. The	+	++	++	<p><b>Likelihood / certainty:</b> Likely</p> <p><b>Geographical scale:</b> Glossopdale</p> <p><b>Temporary / permanent:</b> permanent</p> <p><b>Assumptions made:</b> Allocation of the sites in Policy DS6 will cause harm to the character and setting of Old Glossop Conservation Area. There are no appropriate mitigation measures that could overcome or reduce the harm. Public benefits of development of the site will not outweigh the harm. Allocation of the sites would be contrary to the NPPF.</p>

# 10 Matrices with appraisal of proposed Main Modifications

Policy H3: Amendments to housing site allocations						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
9. Landscape character and natural assets	Need to protect and reinforce landscape character to maintain and strengthen local distinctiveness and sense of place. New development to conserve and enhance cultural landscape assets as well as other natural assets including water courses and ancient woodlands.	report concluded that development would effectively damage the separate identity of Old Glossop as an early settlement within an agricultural landscape and would affect the sense of place.  Modification addresses the issues raised in the Heritage and Landscape Appraisal of land at Woodhead Road, Glossop that found the landscape within the allocated sites to hold local significance. The landscape was found to be both significant and sensitive in both heritage and landscape terms and it was considered these values would be greatly altered by development within it.	+	++	++	<p><b>Likelihood / certainty:</b> likely</p> <p><b>Geographical scale:</b> Glossopdale and National Park <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b></p> <p>The landscape is significant as it retains a layout largely unchanged since at least 1857. The landscape contributes positively to the setting of the Old Glossop Conservation Area. Public benefits of development of the site will not outweigh the harm. Modification will contribute positively to the protection of landscape character including cultural landscape.</p>

## 10 Matrices with appraisal of proposed Main Modifications



Policy H3: Amendments to housing site allocations						
SA Objective	Policy H3: Amendments to housing site allocations				Justification for assessment	
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	
10. Flood risk	New development to be located in flood zone 1. Water efficiency measures to be supported and SuDS required. Minimise discharge of phosphates into River Wye and support other water quality objectives.	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> Unknown <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
11. Sustainable transport	Locate new development in areas allowing choice of sustainable travel modes and good road network. Improve healthy travel networks.	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
12. Health	Support active travel and deliver good quality, open green space, particularly in areas of less affluence; support health and independence in old age and ensure adequate health infrastructure.	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> Permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
13. Access	Journey lengths to key services and facilities to be minimised.	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> unknown <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent

# 10 Matrices with appraisal of proposed Main Modifications

Policy H3: Amendments to housing site allocations						
SA Objective	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
14. Community safety and cohesion	Support for mixed use developments, strong neighbourhood centres and active street frontages. Safety and crime prevention to be addressed by new development.	The amendment does not affect this objective.	0	0	0	<b>Assumptions made:</b> The modification does not change the impact on this objective. <b>Likelihood / certainty:</b> Uncertain <b>Geographical scale:</b> Local Plan area <b>Temporary/permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.
15. Homes for all	Need to increase the number of affordable homes, especially in Glossopdale; and ensure provision of extra care / sheltered housing to meet needs of older people.	Modifications result in a combined loss of 197 homes to the projected housing supply. Whilst this is in the context of a reduced range for objectively assessed need for housing, overall the impact on this objective is likely to be negative.	0	-	-	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary/permanent:</b> permanent <b>Assumptions made:</b> The site at Woodhead Road was expected to deliver 121 new homes, of which it is expected that 30% (36 homes) would be affordable. The allocation west of Tongue Lane will be reduced from 215 to 139, a loss of 76 homes.
16. Leisure and recreation	Support provision of locally accessible opportunities for physical activity and other cultural and leisure activities; also provide new allotment space and other	The amendment does not affect this objective.	0	0	0	<b>Likelihood / certainty:</b> likely <b>Geographical scale:</b> Local Plan area <b>Temporary / permanent:</b> permanent <b>Assumptions made:</b> The modification does not change the impact on this objective.

# 10 Matrices with appraisal of proposed Main Modifications



SA Objective	Policy H3: Amendments to housing site allocations					
	Summary of baseline	Nature of effect (quantified where possible)	ST	MT	LT	Justification for assessment
	opportunities for community food growing.					
<p><b>Summary of significant effects:</b></p> <p>These modifications will have a positive impact on the objective to maintain good local air quality and to minimise noise and light pollution. Also a positive impact on the objective to conserve and enhance town / village - scape quality, archaeological and heritage assets along with their settings. The modifications will have a positive impact on the objective to protect and enhance the character and appearance of the landscape, including cultural landscape assets, as well as the area's other natural assets and resources. Modifications result in a combined loss of 197 homes to the projected housing supply. Whilst this is in the context of a reduced range for objectively assessed need for housing, overall the impact on the objective for homes for all is likely to be negative.</p>						

1. Statement of Common Ground High Peak Borough Council, Derbyshire County Council, Omya; examination library reference Q17
2. High Peak Local Plan Land at Woodhead Road - Policy DS6 Heritage and Landscape Appraisal; June 2015; Mel Morris Conservation

