

Chiltern District Council

Sustainability Appraisal of the Proposed Significant Changes to the Core Strategy for Chiltern District Submission Document

Update to Final Sustainability Appraisal Report for the Core Strategy for
Chiltern District

June 2011

Version: 2.0 – 20 June 2011

Contents

Non-Technical Summary	4
Commenting on this Document	6
1. Introduction	7
Background.....	7
Purpose of this Sustainability Appraisal Report.....	7
2. Methodology	8
3. Identification and Assessment of Reasonable Alternatives	10
The Spatial Strategy (Policy CS1 and Section 7 of the Core Strategy)	11
The Amount and Distribution of Residential Development (Policy CS2, Table 2 and additional text in Section 9).....	12
Reasonable Alternatives to Proposed Changes to Policies CS8, CS14 and CS16	13
4. Appraisal of Proposed Significant Changes	14
(i) Proposed Changes to Strategic Objective 4 (SO4)	14
(ii) Proposed Changes to Policy CS1: The Spatial Strategy (includes proposed changes to Section 7 of the Core Strategy).....	15
(iii) Proposed Change to Policy CS2: Amount and Distribution of Residential Development 2006-2026	17
(iv) Proposed Change to Policy CS8: Affordable Housing Policy	17
(v) Proposed Change to Policy CS14: Sites for Gypsies, Travellers and Travelling Showpeople	17
(vi) Proposed Change to Policy CS16: Employment Land	17
5. Conclusions	19
6. Appendices	20
Appendix 1: Scoping the proposed significant changes to the Core Strategy for likely sustainability implications	20
Appendix 2: Chiltern Local Development Framework: Appraisal Framework.....	23
Appendix 3: Appraisal of proposed significant changes to the Core Strategy – Testing tables	26
Appendix 5: Appraisal of Housing Target Alternatives – Testing Tables.....	48
Appendix 6: Comment Form.....	64

List of Tables

Table 1: Changes to the Core Strategy arising from Inspector's Note ID/14 Subject to Full Sustainability Appraisal.....	8
Table 2: Alternative options for Housing Target.....	12
Table 3: Objectives Testing Summary Table	15

Non-Technical Summary

In order to meet the requirements of both European and UK law, the Council is required to assess environmental, economic and social sustainability of all development plan documents (DPD's) which includes the Core Strategy.

A series of significant changes to the Core Strategy for Chiltern District Submission Document (refer to document CDN125) are being put forward by the Council in order to remedy particular areas of 'unsoundness' identified by a Government Inspector examining the document. This Sustainability Appraisal Update Report has therefore been prepared in order to appraise the likely sustainability impacts of these proposed changes.

Scoping

The scoping section of this report identifies that changes proposed to the following objectives or policies are likely to have sustainability implications and are therefore carried forward for full assessment:

- **Strategic Objective 4**
- **Policy CS1** (The Spatial Strategy) (including substantial alterations to text in Section 7)
- **Policy CS2** (Amount and Distribution of Residential Development 2006-2026)
- **Policy CS8** (Affordable Housing)
- **Policy CS14** (Sites for Gypsies, Travellers and Travelling Showpeople)
- **Policy CS16** (Employment Land)

Summary of sustainability assessment against reasonable alternatives

In order to effectively aid the decision making process, any appraisal of sustainability must also consider the relative sustainability of any reasonable alternatives to changes being put forward.

A 'reasonable' alternative is any alternative to a policy (or change to a policy) considered to be appropriate, realistically achievable and implementable over the lifetime of the Core Strategy. A more detailed definition is contained within this report and can also be found on the Planning Advisory Service (PAS) website¹.

Changes to **Strategic Objective 4** have been proposed in response to the Inspector's concerns that a more flexible and positive objective is necessary. The objective as amended is likely to further support economic growth and competitiveness in the District by proactively stating the intention to encourage local employers and small businesses.

The proposed re-expression of the Spatial Strategy in **Policy CS1 and Section 7** of the Core Strategy articulates more clearly the Council's chosen Spatial Strategy of concentrating development in the four main settlements excluded from the Green Belt and AONB. This is accepted as a hybrid of two scenarios originally put forward for consultation in 2008². All four scenarios put forward by the Council in 2008 are still considered to be reasonable

¹ www.pas.gov.uk

² Chiltern Core Strategy Options Paper (June 2008) (CDN049) available online at http://www.chiltern.gov.uk/corestrategy/site/scripts/download_info.php?downloadID=6&fileID=30

alternatives from which to assess the hybrid strategy against. As the proposed hybrid Spatial Strategy has developed taking into account sustainability issues throughout the plan making process, this assessment reveals that overall it performs better against sustainability criteria than the other 4 scenarios originally put forward.

The Council considers that there are 3 reasonable alternatives to the proposed housing target of between 2,650 and 2,900 (as stated in revised **Policy CS2**). These alternatives are either drawn from supporting evidence or are simply the regional target as set down in the South East Plan (SEP). Taking into account that the alternatives put forward all fall somewhere between 2,550 and 2,900 dwellings, the assessment reveals that in sustainability terms, there is unlikely to be a substantial difference between all four alternative housing targets.

The proposed changes to Policies CS8, CS14 and CS16 are suggested to remedy issues regarding soundness identified by the Inspector through the examination. It is therefore considered that no reasonable alternatives exist to the proposed changes to these policies that can be subject to sustainability appraisal.

The proposed changes to **Policy CS8** are unlikely to substantially alter the sustainability outcomes overall, as it is still considered to be a policy which will have a major positive impact on providing opportunities to live in a decent home in Chiltern District. Similarly, proposed changes to **Policy CS14** outline a more positive approach towards accommodation for the Gypsy and Traveller community, although the potential for some sites to be located in the countryside may have some negative implications in the long term. The proposed flexibility built into **Policy CS16** is unlikely to hinder the economic prosperity of the District, but will help to help satisfy competing demand for residential and community uses in certain areas.

Conclusions

This Sustainability Appraisal Update Report tests the significant changes proposed to the Core Strategy against reasonable alternatives and 18 agreed sustainability criteria. The findings of this assessment are summarised as follows:

- 6 of the proposed significant changes to the Core Strategy are considered to have the potential for sustainability impacts, all others have been 'scoped' out.
- Proposed Policy CS1 (The Spatial Strategy) is considered to be a highly sustainable 'hybrid' option when considered against reasonable alternatives put forward in the 2008 Chiltern Core Strategy Options Paper.
- The proposed revised housing target of between 2,650 and 2,900 dwellings (2006-2026) is unlikely to have significant sustainability implications for Chiltern, having been assessed against reasonable alternatives.
- Changes proposed to policies CS8 (Affordable Housing), CS14 (Sites for Gypsies, Travellers and Travelling Showpeople) and CS16 (Employment Land) are being put forward by the Council to remedy specific issues of soundness identified by the Inspector, and are therefore the only reasonable alternatives available.
- This assessment reveals that proposed changes to CS8, CS14 and CS16 are unlikely to result in a significant departure from the sustainability outcomes identified in the Final Sustainability Appraisal Report (CDN085).

Commenting on this Document

This SA Update Report has been published alongside the Schedule of Proposed Significant Changes to the Core Strategy (CDN125). Comments on the SA Update Report and the Schedule of Proposed Significant Changes are sought from Thursday 23 June 2011 until 5.00pm Friday 5 August 2011. **Comments received after 5.00pm on Friday 5 August 2011 will not be considered.**

To make a comment on this SA Update Report please complete the **Response Form** included in Appendix 6 to this report. This form is also available to view and download at www.chiltern.gov.uk/corestrategy.

Once completed the **Response Form** can be submitted to the Council by:

Email: planningpolicy@chiltern.gov.uk
Post: Chiltern District Council, King George V House, King George V Road,
Amersham, Buckinghamshire, HP6 5AW
Fax: 01494 586508

Should you have any queries on any matters relating to this Sustainability Appraisal Update Report please contact a member of the Planning Policy Team on 01494 732258 or by email at: planningpolicy@chiltern.gov.uk

1. Introduction

Background

- 1.1.1 The Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to carry out a sustainability appraisal of the proposals in development plan documents and prepare a report of the findings of that appraisal. Through the sustainability appraisal process, the local authority must assess the social, economic and environmental impacts arising from the proposals within the development plan document. The Core Strategy for Chiltern District (hereafter referred to as the Core Strategy) is a development plan document and therefore has been subject to sustainability appraisal at each of the key stages in its production.
- 1.1.2 In October 2010, in accordance with Regulation 27 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, the Council published a Final Sustainability Appraisal Report (CDN085) alongside the Core Strategy for Chiltern District Publication Document (CDN098). Following a period of public consultation on these documents, the Final SA Report and the Core Strategy were submitted to the Secretary of State in January 2011.
- 1.1.3 At submission of the Core Strategy, the Secretary of State appointed an independent Inspector (the Inspector) to examine the soundness of the Core Strategy. As part of the examination process, public hearing sessions were held in April 2011 to discuss key matters and issues relating to the Core Strategy. Following these hearing sessions the Inspector issued his note³, in which he identified areas of unsoundness and changes necessary to the Core Strategy to make it sound. In response, the Council has produced a Schedule of Proposed Significant Changes to the Core Strategy (CDN125). The proposed changes set out within this document therefore require further appraisal to identify any impacts in terms of sustainability.

Purpose of this Sustainability Appraisal Report

- 1.1.4 This Sustainability Appraisal Update Report (June 2011) appraises the sustainability implications of the Proposed Significant Changes to the Core Strategy (CDN125) proposed by Chiltern District Council.
- 1.1.5 As the Core Strategy has already been the subject of sustainability appraisal throughout its production, this SA Update Report does not re-assess the whole Core Strategy but only assess the proposed significant changes to policies and objectives within the Core Strategy (as set out within document CDN125) that have sustainability implications. This SA Update Report therefore builds on the Final Sustainability Appraisal Report for the Core Strategy for Chiltern District, Publication Document October 2010 (the Final SA Report). Accordingly, to gain a comprehensive understanding of the sustainability appraisal of the Core Strategy, this report should be read in conjunction with the Final SA Report (CDN085).

³ Post Hearing Note (1) – ‘Identified Unsoundness and Required or Possible Changes’ (ID/14)

2. Methodology

- 2.1.1 A full description of the SA process and methodology, baseline data and other relevant plans and programmes is included in Sections 2.0, 3.0 and 4.0 of the Final SA Report (CDN085). In undertaking the SA of the proposed significant changes, the Council has followed this methodology. As stated however the focus of this SA Update Report is to only assess the significant changes proposed to the Core Strategy (set out within CDN125) that have sustainability implications. There are a number of changes proposed within CDN125 that, although considered to be a significant change to the Core Strategy, would not themselves have any sustainability implications which require them to be subject to the sustainability appraisal process. To determine which of the changes should be subject to SA, each change proposed has been assessed (scoped) to determine whether or not it would give rise to a significant sustainability impact and thus need to be subject to full sustainability appraisal. The results of the sustainability scoping assessment of the proposed significant changes to the Core Strategy are contained within Appendix 1 to this SA Update Report.
- 2.1.2 The significant changes proposed to the Core Strategy that are therefore subject to Sustainability Appraisal within this report are set out in Table 1 below.
- 2.1.3 Section 3 of this SA Update Report seeks to identify, describe and justify any reasonable alternatives to the possible changes to the Core Strategy put forward.

Table 1: Changes to the Core Strategy arising from Inspector’s Note ID/14 subject to Full Sustainability Appraisal

Reference in Core Strategy	Proposed Significant Change (i.e. difference from the Core Strategy as submitted)
Strategic Objective 4	Strategic Objective 4 changed to “ <i>Encourage local employers and small businesses so we can protect the area’s economy for the future.</i> ”
Policy CS1 (The Spatial Strategy) (see associated alterations to text within Section 7 of the Core Strategy)	The policy has been expanded to provide greater explanation of the Council’s chosen Spatial Strategy.
Policy CS2 (Amount and Distribution of Residential Development 2006 to 2026)	The policy has been altered to include a range of between 2,650 dwellings and 2,900 dwellings. The distribution pattern of where the Council anticipates this housing to be located over the Core Strategy has been altered to reflect the Council’s chosen spatial strategy.
Policy CS8 (Affordable Housing)	Additional text has been included within the policy recognising that providing affordable housing can impact on scheme viability and that the Council will negotiate with developers to achieve the target provision of

	affordable housing.
Policy CS14 (Sites for Gypsies and Travellers and Sites for Travelling Showpeople)	Emphasis of the policy has changed, to focus on the allocation of sites for Gypsies and Travellers and Sites for Travelling Showpeople within the Delivery DPD. The policy now has been changed to state that <i>“where suitable and deliverable sites cannot be found within settlement areas excluded from the Green Belt the Council will allocate sites within the Green Belt.”</i>
Policy CS16 (Employment Land)	Policy has been substantively rewritten to provide greater flexibility to allow the change of use of employment sites to other employment generating uses. The Policy now states that the Council will review boundaries of defined large employment sites, and will allow the change of use of non-defined ‘small’ employment sites to residential where certain criteria are met.

3. Identification and Assessment of Reasonable Alternatives

3.1.1 As required by law⁴, when assessing the proposed significant changes to the Core Strategy, proposals must be considered against reasonable alternatives. It is the role of this SA Update Report to test and evaluate the effects of alternatives to the significant changes put forward in terms of their sustainability. Each reasonable alternative identified has been assessed against the 18 sustainability objectives (see Appendix 2) to establish the likely sustainability effects. The SA Update Report comparatively assesses the proposed change against the reasonable alternatives.

Defining a Reasonable Alternative

3.1.2 For the purposes of this report, the Council defines the term 'reasonable alternative' in accordance with the broad definition provided by the European Commission guidance on the EU Directive⁵, which states that a reasonable alternative is "...a different way of fulfilling the plan or program"(p25).

3.1.3 Planning Advisory Service (PAS) guidance for Local Authorities⁶ gives further direction as to what can be considered a 'reasonable' alternative or option, in what it terms 'the reasonableness test' This test comprises a series of 8 questions as follows:

- *will implementation of the option assist in fulfilling the objectives of the plan?*
- *is the option sufficiently detailed – taking into account the nature of the DPD in question – to enable meaningful community involvement, SA and HRA?*
- *Is it a genuine option (for example, ask whether or not it has been included in order to make other options 'look better')?*
- *will the necessary resources be available to deliver the option (consider the commitment of delivery partners)?*
- *will there be sufficient time within the plan period to implement the option?*
- *is there an unacceptable risk that the option will not be fully implemented for one reason or another (ask 'what can I think of that might go wrong with this option')?*
- *is the option sufficiently flexible to accommodate changing circumstances (e.g. a higher housing allocation following a review of the RSS)?*
- *does the option generally conform with national policy and the RSS (or the Spatial Development Strategy in London)?*

⁴ EC Directive 2001/42/EC Article 5(1) and Annex I(h), transposed into UK legislation in the 'Environmental Assessment of Plans and Programmes Regulations 2004'.

⁵ European Commission 'Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment' http://ec.europa.eu/environment/eia/pdf/030923_sea_guidance.pdf

⁶ Planning Advisory Service (PAS) 'Local Development Frameworks: Guidance on options generation and appraisal' October 2009.

- 3.1.4 The Council considers that the alternatives put forward for sustainability assessment in this report satisfy all of the above criteria and can therefore be considered reasonable.

The Spatial Strategy (Policy CS1 and Section 7 of the Core Strategy)

- 3.1.5 As set out in Table 1, a significant change is proposed to Policy CS1: The Spatial Strategy of the Core Strategy. The proposed change suggested responds to issues raised through the examination process that the Council's chosen Spatial Strategy had not been expressed properly within the Core Strategy. Additional text is also proposed in Section 7 of the Core Strategy explaining in detail each element of the chosen Spatial Strategy.
- 3.1.6 In the Core Strategy Options Paper June 2008 (CDN049), the Council identified four strategic options / scenarios on which to base the Spatial Strategy. These scenarios were subject to sustainability appraisal and the outcome of this appraisal is detailed within the document 'Core Strategy: Strategic Options Sustainability Appraisal Report June 2008', prepared by Carter Jonas. The details of each of these scenarios and the summary of the outcome of the sustainability appraisal of the alternative scenarios is set out in Appendix 4 to this Update Report. In summary, the scenarios identified for the distribution of development within the District within the Strategic Options Paper were:
- **Scenario 1:** Urban Concentration;
 - **Scenario 2:** Targeted Expansion of Amersham and Chesham Urban Areas;
 - **Scenario 3:** Targeted Expansion of Amersham, Chesham and Chalfont St Peter Urban Areas; and
 - **Scenario 4:** Dispersed Pattern of Development.
- 3.1.7 Taking into account changing information about the housing land supply in the District, the Council's proposed Spatial Strategy has evolved since 2008. The spatial strategy as articulated in the proposed change to Policy CS1 no longer aligns entirely within any one of the scenarios set out within the Core Strategy Options Paper. As set out in the Council's Core Strategy Topic Paper (CDN128), the Spatial Strategy is now most appropriately described as a hybrid of Scenario 3 and Scenario 1. The focal points for housing growth and new development within the Council's proposed Spatial Strategy are as set out within Scenario 3, although the Council is now proposing to concentrate development in the areas of these settlements excluded from the Green Belt as opposed to allowing limited expansion; this aspect of the Strategy thus aligning with Scenario 1. Accordingly, it is necessary to appraise the proposed change to the Spatial Strategy against all reasonable alternatives.
- 3.1.8 In this SA Update Report, the Council considers that the reasonable alternatives to the proposed Spatial Strategy (as set out within CS1 and expressed in the proposed changes to Section 7) are the four scenarios identified within the Strategic Options Paper (CDN049). The sustainability appraisal of these alternative scenarios is re-stated within Appendix 4 of this update report. The sustainability appraisal of proposed Policy CS1 against the sustainability objectives is set out within Appendix 3. Section 4 of this SA Update Report considers the sustainability outcomes of the proposed Policy CS1 against the sustainability outcomes of the alternatives,

The Amount and Distribution of Residential Development (Policy CS2, Table 2 and additional text in Section 9)

3.1.9 The Core Strategy for Chiltern District, Submission Document January 2011 proposed that the housing target for the District be 2,400 dwellings. The South East Plan (May 2009) currently sets the housing allocation for Chiltern District at 2,900 dwellings. Through the examination process the appointed Inspector has identified that a housing allocation of 2,400 dwellings would be unsound and the starting point for the housing target within the Core Strategy should be the South East Plan allocation of 2,900 dwellings. The proposed alteration to Policy CS2 states the housing target as a range of between 2,650 dwellings and 2,900 dwellings. The proposed change to Policy CS2 would also set out the broad distribution of this housing across the District so as to accord with the proposed Spatial Strategy as expressed in Policy CS1.

3.1.10 In determining the reasonable alternatives, the Council is able to discount a number of options. For example, a housing allocation within the Core Strategy above 2,900 dwellings would not conform to the South East Plan; particularly as it is clear that Chiltern District is not an identified Growth Area⁷. Additionally, an allocation of 2,400 dwellings or less is not considered to be justified. Recognising that the South East Plan is the starting position for the housing target, the Council considers that the housing target could be expressed as a range. Accordingly, in determining alternative options, the SA Update Report seeks to principally establish what reasonable alternative options exist when determining what the lowest housing number within that range should be. The Council therefore has identified four alternative options for a housing target which are set out in Table 2.

Table 2: Alternative options for Housing Target

Option (Alternative)	Justification as to why considered a reasonable alternative
2,550 dwellings to 2,900 dwellings	Based on evidence in the document 'Assessment of Housing Demand in Chiltern (2006 to 2026) (CDN114). This assumes a delivery rate of 45% of the total housing yield from SHLAA sites over the plan period
2,650 dwellings to 2,900 dwellings	As set out in Inspector's Post Hearing Note (1) – ID/14.
2,800 dwellings to 2,900 dwellings	Based on evidence in the document 'Assessment of Housing Demand in Chiltern (2006 to 2026) (CDN114). This assumes a delivery rate of 75% of the total housing yield from SHLAA sites over the plan period
2,900 dwellings (no lower range)	The existing allocation within the South East Plan

⁷ Refer to Inspector's comments in his Post Hearing Note 1 (ID/14)

Reasonable Alternatives to Proposed Changes to Policies CS8, CS14 and CS16

3.1.11 The proposed changes to Policies CS8, CS14 and CS16 are suggested to remedy issues to do with soundness identified by the Inspector through the examination. Policies CS8 and CS14 have been altered as the wording of the policies suggested within the Core Strategy, as submitted, was considered by the Inspector to not be justified by the evidence available, nor consistent with national policy. The suggested proposed changes therefore seek to align these policies with national policy and the Council's evidence. The proposed changes to Policy CS16 have also been suggested to ensure the policy has greater flexibility over the Core Strategy period. It is therefore considered that no reasonable alternatives exist to the proposed changes to these policies that can be subject to sustainability appraisal.

4. Appraisal of Proposed Significant Changes

4.0.1 This section sets out the key findings arising from the appraisal of the proposed changes to the Core Strategy, and the identified reasonable alternatives, against the sustainability objectives. With the exception of the appraisal of the change to Strategic Objective 4, the results of this appraisal are set out in the tables in Appendices 3, 4 and 5 of this SA Update Report.

(i) Proposed Changes to Strategic Objective 4 (SO4)

4.1.1 In response to concerns made by the Inspector, the Council proposes to substantially re-word Strategic Objective 4 of the Core Strategy. This section outlines how the policy is to change and what this change will mean in terms of sustainability.

What has changed?

4.1.2 In his note ID/14, the Inspector raises concerns over the Council's approach to employment land. He suggested that, *"There is sufficient evidence to indicate that a more flexible approach is necessary."*... *"The present strategic objective 4, related target and policy CS16 essentially stay the same thing (no net loss of employment land) and are not focussed on achieving positive outcomes."*

4.1.3 The Council has therefore proposed a change to Strategic Objective 4 (SO4) as follows:

SO4 (as submitted):

Ensure that there is no net loss of employment land or floorspace and encourage a thriving economy.
Target: No net loss in employment floorspace (as defined in national policy statement PPS4) during the period 2006-2026.

SO4 (as amended):

Encourage local employers and small businesses so we can protect the area's economy for the future.
Target: Year-on-year increase in the number of people employed in Chiltern District

4.1.4 The objective as amended is intended to be more closely aligned with the Community Vision as expressed in the Sustainable Community Strategy for Chiltern (CDN076). The objective as proposed takes on a more proactive approach to protecting the District's economy, with a much more positive monitoring indicator installed alongside.

What are the sustainability implications of this change?

Table 3: Objectives Testing Summary Table

	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
SO4 (as submitted)	?	o	?	o	o	o	o	?	o	o	o	o	o	o	✓	✓	✓	✓
SO4 (as amended)	o	o	o	o	o	o	o	?	?	o	o	o	o	o	✓	✓	✓	✓

✓	positively compatible
?	uncertain
x	incompatible
o	no link/neutral effect

4.1.5 The change made to this objective is considered likely to have a positive impact on the local economy as it outlines a more proactive approach to economic growth. Impacts on landscape, townscape and historic environment remain uncertain, although are likely to be addressed elsewhere in the strategy. The removal of the absolute protection of employment land is likely to ease pressures for new housing and community facilities in accessible locations in the long term.

(ii) Proposed Changes to Policy CS1: The Spatial Strategy (includes proposed changes to Section 7 of the Core Strategy)

4.1.6 Appendix 3 sets out the assessment of the proposed change to Policy CS1 when appraised against the sustainability objectives. As set out in Section 3 of this report the proposed change to this policy has been considered against the reasonable alternatives as set out in Appendix 4.

4.1.7 A comparative summary of the sustainability outcomes of proposed CS1 and 4 alternative scenarios is included in Table 4 below. When considered against the reasonable alternatives it is clear that by proposing the hybrid Spatial Strategy within CS1 (i.e. by combining elements of scenario 1 and scenario 3 as set out the Core Strategy Options Paper) the sustainability of the Spatial Strategy notably improves. For example, by concentrating development within the built up areas of the four main settlements in the District and not seeking Greenfield (Green Belt) release at the edge of these settlements, the strategy will largely avoid development on sites that have not previously been developed (conserving soil resources); positively improve accessibility to essential services, maintain biodiversity and improve opportunities for access to a decent home.

Table 4: Summary of testing results for proposed Spatial Strategy against four alternative scenarios

Sustainability Objective	Spatial Strategy proposed in revised CS1	2008 Strategic Options Sustainability Appraisal			
		Scenario 1	Scenario 2	Scenario 3	Scenario 4
1. Housing	✓	-	+	+	++
2. Safety	?	0	0	0	0
3. Accessibility	✓+	-	+?	+?	-
4. Health	✓	0	+	+	0
5. Transport	✓+	-?	++	++	-
6. Water Use	?	--?	-	-	--?
7. Biodiversity	✓	++?	-?	-?	-
8. Landscape & Townscape	?	0	+	+	--?
9. Historic Environment	?	-?	+	+	+
10. Climate Change	✓	0	+	+	0
11. Flood Risk	?	0?	0	0	0
12. Waste	✓	0	0	0	0
13. Soil	✓+	+	--?	--?	-
14. Land Use	?	++	--	--	-
15. Economic Growth	✓	-	+	+	-?
16. Diversity	~	0?	0?	0?	0?
17. Workforce	~	-?	+	+	++
18. Employment	✓	--?	-?	-?	-?

Please note: the appraisal system employed in 2008 differs slightly from that used in this report, therefore both keys are included below.

Key

Major positive	✓+
Minor positive	✓
Uncertain	?
Negative	✗
Neutral	~

Key (2008 SA)

Major positive	++
Minor positive	+
Neutral	0
Minor negative	-
Major negative	--
Uncertain	?

4.1.8 Unlike the outcome of the appraisal of the alternative scenarios in Appendix 4, the proposed spatial strategy is considered unlikely to give rise to any significant negative outcomes when assessed against the sustainability objectives. Furthermore, the proposed change to Policy CS1 is unlikely to result in any different sustainability outcome to that identified within the Final SA Report (CDN085)

(iii) Proposed Change to Policy CS2: Amount and Distribution of Residential Development 2006-2026

- 4.1.9 Appendix 3 sets out the assessment of the proposed change to Policy CS2 and Appendix 5 contains the assessment of reasonable alternatives.
- 4.1.10 When considered against reasonable alternatives the housing target and distribution as set out in the proposed changes to Policy CS2 is unlikely to give rise to any significant sustainability issues. As each of the options considered do not vary substantively (a variance of between 100 and 350 dwellings over a 20 year period), the assessment shows very little variance in sustainability outcomes between each of the options considered. At the same time the outcome of the appraisal of the proposed change to policy CS2 only varies slightly from the assessment of the policy carried out in the final SA Report. Accordingly the proposed change to policy CS2 is not considered to alter the outcomes of the final SA Report.

(iv) Proposed Change to Policy CS8: Affordable Housing Policy

- 4.1.11 Appendix 3 sets out the assessment of the proposed change to Policy CS8. Although the proposed change to policy CS8 is considered to vary substantially from the original policy the assessment shows that the sustainability outcomes are likely to be the same as those identified in the Final SA Report. The policy is still considered to have a major positive impact on providing the opportunity for a decent home as well as having major economic benefits.

(v) Proposed Change to Policy CS14: Sites for Gypsies, Travellers and Travelling Showpeople

- 4.1.12 Appendix 3 sets out the assessment of the proposed change to Policy CS14. The proposed changes are considered to alter the sustainability outcomes of the policy from those identified in the Final SA Report. For example the policy now provides a more positive approach to meeting the accommodation needs of those within the Gypsy, Traveller and Travelling Showpeople communities, with sites to be allocated in the Green Belt if necessary. Such a change is also likely to have positive benefits in terms of protecting the townscape and historic character of urban areas. However, allowing the potential for sites to be allocated in Green Belt locations may lead to conflicts with the SA objectives relating to accessibility, sustainable modes of transport, previously developed land, biodiversity and soil resources.

(vi) Proposed Change to Policy CS16: Employment Land

- 4.1.13 Appendix 3 sets out the assessment of the proposed change to Policy CS16. The changes made to this policy mean that some smaller employment sites, too small to be saved by 'saved' policies E2 and E3 may be lost for residential purposes. Whilst this may slightly reduce the range of employment sites and types of activities in the District in the long term, it is likely to have positive repercussions in terms of meeting

the overall housing requirement; and protecting townscape and the historic environment. The changes to the policy will also inherently promote the efficient use of sites which may no longer demonstrate demand for employment purposes.

- 4.1.14 Overall, the economic benefits of this policy are likely to remain very positive in sustainability terms, as the policy will continue to protect the vast majority of active employment sites across the District.

5. Conclusions

- 5.1.1 The sustainability appraisal of the proposed significant changes to the Core Strategy has shown that although a number of substantive changes have been proposed to policies in the Core Strategy, these changes are unlikely to give rise to any significant negative sustainability effects. In most cases the SA process, shows that when appraised against the sustainability objectives, the proposed changes to policies do not materially alter the outcomes of the appraisal of the original policy in the Final SA Report.
- 5.1.2 When appraised against the reasonable alternatives, the proposed change to Policy CS1: the Spatial Strategy would bring the most number of significant sustainability benefits out of all these options considered. This therefore reaffirms the decision for the Council to pursue this Spatial Strategy within the Core Strategy.
- 5.1.3 However, when comparing the outcomes of the sustainability appraisal of the proposed changes to policy CS1 with outcomes identified in the Final SA Report no substantial differences are identified. The reason for this is because the change to the policy was necessary to make Policy CS1 and the Spatial Strategy clearer to the reader; and not because the key components of that policy have been altered as a result of the proposed changes.
- 5.1.4 When considering the alternative options for the District housing target it is clear that because there is only a small degree of variance between the housing numbers within these options, the sustainability outcomes of each of these options are all similar, if not the same. Thus, when considered against all the sustainability objectives, no one option had any significantly greater sustainability impact than the other.
- 5.1.5 To conclude the proposed changes to the Core Strategy, as appraised in this SA Update Report, do not materially alter the conclusions in the Final SA Report.

6. Appendices

Appendix 1: Scoping the proposed significant changes to the Core Strategy for likely sustainability implications

REF CDN125	Paragraph / Policy	Summary of change	Further SA Required?	Comments
C1	Section 4.2	Updated explanation of housing figure	No	Explanatory text – changes to housing figure picked up under change C3
C2[a]	Section 6, Strategic Objective 1	Per annum housing target updated to reflect new overall housing figure	No	Update to reflect housing figure – assessed in combination with policy CS2
C2[b]	Section 6, Strategic Objective 4	Amendment to make objective more positive and align with community vision	Yes	Alteration to objective since appraisal of objectives was last undertaken in CDN085
C2[c]	Section 6, Strategic Objective 7	Amendment to objective to update in line with evidence base	No	Alteration to update accuracy of figures in line with evidence base.
C3[a]	Section 7	Updated text to provide clarification of the spatial strategy	Yes	Considered as part of appraisal of policies CS1 and CS2
C3[b]	Policy CS1	Re-expression of the spatial strategy in policy	Yes	Assessment of evolved strategy required – alternatives assessed in SA of Strategic Options (CDN050). Assess in combination with Section 7 and CS1.
C3[c]	Policy CS2	Updated to reflect revised housing target and separates MDS figures and Green Belt Villages and Infill Rows of Dwellings	Yes	Assessment of housing number and distribution required. Distribution linked to policy CS1, therefore assessment should be carried out in combination with CS2 and Section 7.
C4	Key Diagram	Improved Rail link to Chesham removed to reflect latest position	No	Change to key diagram unlikely to have any sustainability implications.
C5[a]	Section 9	Insertion of new text to explain housing supply position	No	Explanatory text – appraisal not required.
C5[b]	Para 9.3	Amendment of paragraph to outline requirements of any re-development of Amersham & Wycombe College site.	No	Unlikely to lead to significant sustainability issues
C6	Table 2	Detailed numerical breakdown of housing supply position	No	Sustainability implications relating to housing numbers will be picked up within the appraisal of policy CS2
C7[a]	Policy CS8	Added flexibility included within the policy, largely by taking account of viability issues.	Yes	Change to the likely outcomes of the policy which may have sustainability implications.
C7[b]	Policy CS10	Sentence added to	No	Unlikely to significantly effect the

		outline the potential for a future review of the policy in line with the Council's Strategic Housing Framework.		outcomes of this policy in terms of sustainability
C8[a]	Policy CS12	Slight change to policy wording to explicitly include those with mental health problems. Indicator also replaced.	No	Unlikely to significantly effect the outcomes of this policy in terms of sustainability
C8[b]	Para 11.4	Inclusion of text which states the Council's aspirations for the NSE site.	No	Explanatory text – appraisal not required.
C8[c]	Policy CS13	Change to policy which removes restriction of re-development to medical facilities or residential institutions	No	Unlikely to significantly effect the outcomes of this policy in terms of sustainability
C8[d]	Para 11.5	Alteration to text which updates finding of evidence base	No	Explanatory text – change will be appraised in context of changes to CS14
C8[e]	Para 11.9	Alteration to paragraph which updates finding of evidence base	No	Explanatory text – change will be appraised in context of changes to CS14
C8[f]	Para 11.12	Alteration to text to update Council's position	No	Explanatory text – change will be appraised in context of changes to CS14
C8[g]	Policy CS14	Criteria removed from policy. Commitment to allocating sites in the Green Belt added, if it is found that no suitable or deliverable sites can be allocated within settlement areas excluded from the GB.	Yes	Significant change to policy which is likely to affect the outcomes of the policy in terms of sustainability.
C9[a]	Policy CS15	Slight changes to policy wording and indicator replaced.	No	Unlikely to significantly effect the outcomes of this policy in terms of sustainability
C9[b]	Para 12.5	Textual change to update Council's position	No	Explanatory text – change will be appraised in context of changes to CS16
C9[c]	Para 12.6	Textual change to update Council's position	No	Explanatory text – change will be appraised in context of changes to CS16
C9[d]	Policy CS16	Substantial redraft of policy wording to allow greater flexibility and allow some smaller, unused employment sites to change use.	Yes	Significant change to policy which is likely to affect the outcomes of the policy in terms of sustainability.
C9[e]	Policy CS19	Slight changes to policy wording	No	Unlikely to significantly effect the outcomes of this policy in terms of sustainability
C10[a]	Para 14.4	Update to text to reflect changes to policy CS23	No	Explanatory text – change will be appraised in context of changes to CS23

C10[b]	Policy CS23	Slight changes to wording made to clarify Council's position	No	Unlikely to significantly effect the outcomes of this policy in terms of sustainability
C11	Appendix 4	Update to table to reflect partial deletion of Local Plan policy GB5	No	Unlikely to significantly effect the outcomes of the Core Strategy in terms of sustainability

Appendix 2: Chiltern Local Development Framework: Appraisal Framework

Social Progress which meets the needs of everyone		
Objective Number	Objectives	Indicators
1	To provide existing and future residents with the opportunity to live in a decent home	<ol style="list-style-type: none"> 1. Homes failing decent home standard or judged unfit 2. Housing completions, allocations commitments 3. No of empty properties 4. House price/earnings affordability ratio 5. Amount of affordable housing delivered, or amount of new affordable housing per annum 6. No of households on the housing register 7. Amount of key worker housing provided per annum 8. Temporary accommodation/ rough sleepers 9. Size of new homes completed (no. bedrooms)
2	The creation of safer places to live & work and to reduce anti-social behaviour	<ol style="list-style-type: none"> 1. Recorded crimes per 1,000 pop.- domestic burglaries, violent offences, vehicle crimes 2. Fear of Crime 3. Public concern over noise (No. of noise complaints received by category) 4. Number of Anti Social Behaviour Orders issued (ASBOs).
3	To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities & services	<ol style="list-style-type: none"> 1. % of residents defined as within a distance of 500m of key local services incl.: PO, food shop, GP, primary school, child care & hospital 2. Access to public open space
4	Improve & maintain health & well-being of the population & reduce inequalities in health	<ol style="list-style-type: none"> 1. Local Area, Quality of Life Indicators, Health and Social Well-Being (Audit Commission)
Effective Protection of the Environment		
5	To encourage the use and integration of sustainable methods of transport, to reduce negative effects on the environment	<ol style="list-style-type: none"> 1. Modal split 2. % of children travelling to (a) primary school (b) secondary school by different modes of transport 3. Passive diffusion tube data suggesting an exceedence of the UK Annual Mean Objective for nitrogen dioxide (NO2). 4. Air Quality Management Area (AQMA) designations. 5. Annual average flow per 1,000km of principal road
6	To provide for sustainable levels of water use & supply & management	<ol style="list-style-type: none"> 1. Water leakage rate from mains & customer pipes 2. Rivers of Good or Fair chemical & biological water quality 3. Water use & availability 4. No of incidents of major & significant water pollution occurring in a particular year in each of the District 5. Quality & quantity of groundwater 6. Use of Sustainable Drainage Systems in new development
7	To maintain & enhance	<ol style="list-style-type: none"> 1. Achievements of Buckinghamshire Biodiversity

	biodiversity	Action Plan targets 2. Condition & area of SSSI's, County Wildlife Sites and Local Nature Reserves 3 Area of ancient woodland in District 4. Protection and enhancement of chalk rivers. 5. Impact of development on Protected Species.
8	To protect & enhance the landscape and townscape character of Buckinghamshire & in particular, those areas of designated importance	1. % of designated area covered by management plans 2. Chilterns AONB 3. LLAs & AALs 4. Area under agreement under the Environmentally Sensitive Area & Countryside Stewardship agri- environment schemes 5. Hectarage of designated open space developed per annum
9	To conserve & where appropriate enhance the historic environment	1. Buildings of Grade I & II* at risk of decay 2. Loss or damage to of scheduled ancient monuments & historic parks & gardens 3. % CA reviews completed & new areas added 4. % of archaeological sites at risk
10	To reduce contributions to climate change through: a) Sustainable building practices b) Maximising the potential for renewable energy & energy conservation	1. Take up of grants for energy saving improvements 2. No of new buildings achieving either the SAP or BREEAM rating for energy efficiency 3. Energy use per household (gas & electricity) 4. Electricity generated from renewable sources & CHP
11	To minimise the risk of flooding from fluvial and surface water sources, in relation to both new & existing development	1. No. of properties affected by fluvial flood events 2. Frequency of fluvial flood events 3. Development in the floodplain 4. New development with sustainable drainage installed
Prudent Use of Natural Resources		
12	Minimise waste & then re-use or recover it through recycling, composting or energy recovery	1. % of the tonnage of household waste arising which have been a) recycled b) composted c) used to recover heat, power & other energy sources d) landfilled 2. % of construction & demolition waste going to landfill 3. Hazardous waste 4. Amount of secondary/ recycled aggregates used compared with virgin aggregates
13	To conserve soil resources & quality	1. Loss of best & most versatile agricultural land to development 2. Areas of contaminated land
14	To improve the efficiency of land use through the re-use of existing buildings & previously developed land	1. % of new homes built on PDL 2. Housing density calculations as contained in Housing Monitoring Report 3. Empty properties
Maintenance of High and Stable Levels of Economic Growth and Employment		
15	To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness	1. % change in the total of VAT registered businesses in the District 2. Out commuting levels
16	To encourage a diverse economy which is focused on higher value added, lower impact activities	1. Average annual increase in GVA per worker for manufacturing & the knowledge sectors 2. Diversity of economic sectors represented in the

		<p>area.</p> <p>3. Image indices derived from consultations with businesses & local property specialists as part of the planning process</p>
17	To develop & maintain a skilled workforce to support long-term competitiveness of the District	<p>1. 19 year olds with Level 2 qualifications (5 or more GCSEs at grades A*-C or NVQ equivalent)</p> <p>2. % of population qualified to NVQ level 3 or equivalent</p> <p>3. Proportion of adults with poor literacy & numeracy skills</p>
18	To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region	<p>1. Proportion of people of working age who are unemployed</p> <p>2. Proportion of people of working age out of work for more than a year</p>

Appendix 3: Appraisal of proposed significant changes to the Core Strategy – Testing tables

Proposed change to Policy CS1: The Spatial Strategy

	Original Assessment (CDN085)	Likely effect after change?	Direct or indirect effects?	Short term or long term effects?	Comments/Recommendations
Sustainability Objective	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	Will the policy directly affect the sustainability objective, or are the impacts more indirect?	Are the impacts of this policy likely to be felt in the short term (within the next 5 years) or long term (until and exceeding the end of the plan)?	What are the general effects of this policy thought to be? What recommendations can be made to ensure that this policy is more likely to satisfy the corresponding sustainability objective?
1. To provide existing and future residents with the opportunity to live in a decent home	✓	✓	Direct	Long Term	Policy outlines in greater detail the spatial strategy for the Core Strategy. The strategy has not been altered since the last SA, so the policy is likely to continue to allow opportunities to live in a decent home in the main settlements in built up areas excluded from the Green Belt and AONB.
2. The creation of safer places to live & work and to reduce anti-social behaviour	?	?	Indirect	Long Term	At a strategic level, it remains uncertain as to whether concentrating development in urban areas is likely to have a significant positive or negative affect on crime and antisocial behaviour. This is likely to be dependent on the design, location and layout of individual schemes.

3. To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities and services.	✓+	✓+	Direct	Short & Long Term	The policy retains a clear focus on the four main built up settlements excluded from the Green Belt and AONB. This is likely to continue to maximise accessibility to essential services and facilities.
4. To improve and maintain health & well being of the population & reduce inequalities in health	✓	✓	Indirect	Long Term	The policy is likely to continue to ensure future residents of the District maintain good access to health facilities in the main towns.
5. To encourage the use of sustainable methods of transport to reduce negative effects on the environment.	✓+	✓+	Direct	Short Term & Long Term	The policy continues to focus development on towns within the District with good accessibility to public transport facilities. Development in such locations is also likely to promote non-car modes of transport such as walking and cycling. In the long term this will help to reduce emissions and the District's overall contribution to climate change.
6. To provide for sustainable levels of water use & supply & management.	?	?	Direct	Short Term	Policy may continue to put pressure on existing water and sewage networks in built up areas.
7. To maintain & enhance biodiversity.	✓	✓	Indirect	Long term	Policy as amended is likely to continue to protect biodiversity assets, as the policy states a clear intention to protect AONB and Green Belt locations.
8. To preserve & enhance the landscape and townscape character of Chiltern & in particular, those areas of designated importance.	?	?	Direct	Short Term & Long Term	The policy states a clear intention to protect landscape designations such as AONB and Green Belt. However, focusing on built up areas is likely to put pressure on townscape, although this is likely to be managed by policies elsewhere in the Core Strategy. Outcomes remain uncertain.

9. To conserve & where appropriate enhance the historic environment.	?	?	Direct	Short Term & Long Term	Focusing on built-up areas in main towns is likely to put pressure on historic environment. Developments will have to respect historic environment in accordance with policies elsewhere in the strategy.
10. To reduce contributions to climate change through: a) Sustainable building practices; b) Maximising the potential for renewable energy & energy conservation.	✓	✓	Indirect	Long Term	The strategy is likely to maximise opportunities to provide communal renewable energy sources such as combined heat and power.
11. To minimise the risk of flooding in relation to both new & existing development.	?	?	Indirect	Short & Long Term	A strategy of urban concentration may increase hard surfacing in urban areas and exacerbate the risk of flooding. These issues will be dependant on compliance with other policies in the Core Strategy and site specific circumstances.
12. Minimise waste & then re-use or recover it through recycling, composting or energy recovery.	✓	✓	Indirect	Short & Long Term	Concentrating development in the main urban settlements may have the beneficial impact of increasing the viability of re-use and recycling schemes.
13. To conserve soil resources & quality.	✓+	✓+	Direct	Long Term	Policy will continue to protect wider countryside from development and therefore soil resources.
14. To improve the efficiency of land use through the re-use of existing buildings & previously developed land.	✓	?	Indirect	Short & Long Term	Strategy of urban concentration is likely to promote the re-use of previously developed land. However the definition of PDL in PPS3 no longer includes back gardens, so in reality number of sites brought forward on PDL is likely to reduce in Chiltern.
15. To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness.	✓	✓	Indirect	Long Term	Strategy is likely to achieve a good balance between housing and employment in urban areas.

16. To encourage a diverse economy which is focused on higher value added, lower impact activities.	~	~	~	~	No obvious links
17. To develop & maintain a skilled workforce to support long-term competitiveness of the District.	~	~	~	~	No obvious links
18. To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region.	?	✓	Indirect	Long Term	Policy of focus on 4 towns excluded from AONB and Green Belt is likely to ensure a labour supply close to employment opportunities. Indirectly in the long term this should help maintain high levels of employment.

Summary

The changes made to this policy offer a more detailed re-expression of the locational strategy, to give greater clarity and emphasise the aim to protect Green Belt and AONB areas from development. The strategy makes it clear that the focus for development is the four main built up areas excluded from the GB and AONB (i.e. Amersham/Amersham-on-the-Hill, Chesham, Little Chalfont and Chalfont St Peter). As the strategy itself has not changed the sustainability implications also remain largely unchanged. However, since the production of the Core Strategy and sustainability appraisal in CDN085, changes to the definition of previously developed land (PDL) have been made to exclude areas of private residential garden. This is likely to result in more non-pdl being developed in Chiltern as the strategy of focusing development in the four towns is reliant on a number of SHLAA sites encompassing back gardens.

Proposed change to Policy CS2: Amount and Distribution of Residential Development 2006-2026

	Original Assessment (CDN085)	Likely effect after change?	Direct or indirect effects?	Short term or long term effects?	Comments/Recommendations
Sustainability Objective	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	Will the policy directly affect the sustainability objective, or are the impacts more indirect?	Are the impacts of this policy likely to be felt in the short term (within the next 5 years) or long term (until and exceeding the end of the plan)?	What are the general effects of this policy thought to be? What recommendations can be made to ensure that this policy is more likely to satisfy the corresponding sustainability objective?
1. To provide existing and future residents with the opportunity to live in a decent home	✓+	✓+	Direct	Long Term	An increase in the overall housing target from 2,400 to between 2,650 and 2,900 is likely to increase opportunities for current and future residents to live in a decent home.
2. The creation of safer places to live & work and to reduce anti-social behaviour	✓	✓	Indirect	Long Term	The policy maintains a focus on the main urban areas which is likely to help a mix of uses within urban areas which should help create safer places to live and work.
3. To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities and services.	✓	✓	Direct	Long Term	Although the proportion of dwellings allocated to the four main settlements (Amersham, Chesham, Little Chalfont, Chalfont St Peter) has been slightly reduced in the revised policy, the policy still allocates a very large proportion of the total target to these settlements, which will ensure a good level of accessibility to essential services and facilities.

4. To improve and maintain health & well being of the population & reduce inequalities in health	✓	✓	Indirect	Long Term	The policy continues to allocate a large proportion of dwellings to the main settlements excluded from GB and AONB and therefore maximises access to essential medical facilities in these towns. Opportunities for walking and cycling are also likely to be maintained under this strategy.
5. To encourage the use of sustainable methods of transport to reduce negative effects on the environment.	✓	✓	Indirect	Short & Long Term	Policy maintains a focus on urban areas which is likely to promote the use of non-car modes of transport, including public transport, walking and cycling.
6. To provide for sustainable levels of water use & supply & management.	✓	?	Indirect	Long Term	There are identified water resource and use issues in the District. An increase in the number of dwellings planned over the plan period may have impacts in terms of sustainable water use, unless standards for sustainable water use are introduced.
7. To maintain & enhance biodiversity.	✓	✓	Indirect	Short & Long Term	The policy still maintains an urban focus which is likely to protect open countryside and biodiversity assets.
8. To preserve & enhance the landscape and townscape character of Chiltern & in particular, those areas of designated importance.	?	?	Indirect	Short & Long Term	Whilst the policy is likely to protect natural landscapes by concentrating a larger number of housing in non AONB and GB areas, this may put pressures on maintaining high quality townscape character.
9. To conserve & where appropriate enhance the historic environment.	?	?	Indirect	Short & Long Term	The policy maintains the potential to put pressures on the character and setting of the historic environment in the four main urban areas, although this is likely to be mitigated by policy elsewhere in the strategy.

10. To reduce contributions to climate change through: a) Sustainable building practices; b) Maximising the potential for renewable energy & energy conservation.	✓	✓	Indirect	Short & Long Term	The policy as changed is unlikely to inhibit the the use of sustainable building practises and use of renewable energy sources.
11. To minimise the risk of flooding in relation to both new & existing development.	?	?			Some areas of the four targeted settlements are already susceptible to surface water flooding, which changes made to this policy are likely to exacerbate. However, policies CS4 and CS26 remain in place to mitigate against any flooding issues.
12. Minimise waste & then re-use or recover it through recycling, composting or energy recovery.	~	~	~	~	No obvious links
13. To conserve soil resources & quality.	✓	✓	Indirect	Short & Long Term	Although the revised policy now indicates a proportion of dwellings will be built on MDS sites and a small number have already been built in the Green Belt villages, none of these are likely to be in the open countryside, thus continuing to protect soil resources.
14. To improve the efficiency of land use through the re-use of existing buildings & previously developed land.	✓+	?	Indirect	Short & Long Term	Changes to PPS3 (Housing) mean that residential gardens are no longer classed as previously developed land (PDL). A policy of concentrating development in the main settlements is likely to maintain reliance on such sites.
15. To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness.	✓+	✓+	Direct	Short & Long Term	Policy continues to promote a close correlation between jobs and housing in the main settlements.

16. To encourage a diverse economy which is focused on higher value added, lower impact activities.	~	~	~	~	No obvious links
17. To develop & maintain a skilled workforce to support long-term competitiveness of the District.	✓	✓	Indirect	Short & Long Term	Providing between 2,650 and 2,900 houses is likely to ensure a continuing supply of labour over the plan period, assuming job opportunities are maintained or increased.
18. To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region.	~	~	~	~	No obvious links

Summary

Revisions to policy CS2 have increased the overall target figure from 2,400 to 2,650-2,900. The policy now also separates the Major Developed Sites in the Green Belt from the built-up areas of the main settlements and also indicates that 70 dwellings have already been built in Green Belt Villages and Infill in rows of Dwellings in the Green Belt. This has slightly reduced the amount of dwellings allocated in the built up areas of the four main settlements (Amersham/Amersham-on-the-Hill/Chesham/Little Chalfont and Chalfont St Peter) although the focus remains largely on these settlements. The overall effects of the policy are likely to remain the same as those indicated in CDN085, although an increase in dwellings may lead to additional water resource use implications over the plan period. The exact outcomes are likely to depend on whether a housing figure of 2,650, 2,900 or somewhere in between is realised. The change in definition of previously developed land (to no longer include residential garden land) is likely to negatively effect the outcomes against SA objective 14.

Proposed change to Policy CS8: Affordable Housing Policy

	Original Assessment (CDN085)	Likely effect after change?	Direct or indirect effects?	Short term or long term effects?	Comments/Recommendations
Sustainability Objective	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	Will the policy directly affect the sustainability objective, or are the impacts more indirect?	Are the impacts of this policy likely to be felt in the short term (within the next 5 years) or long term (until and exceeding the end of the plan)?	What are the general effects of this policy thought to be? What recommendations can be made to ensure that this policy is more likely to satisfy the corresponding sustainability objective?
1. To provide existing and future residents with the opportunity to live in a decent home	✓+	✓+	Direct	Short & Long Term	The change to the policy, which enables greater acknowledgement of viability issues. The policy is still likely to ensure a good level of affordable housing provision.
2. The creation of safer places to live & work and to reduce anti-social behaviour	~	~	~	~	No obvious links
3. To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities and services.	✓+	✓+	Indirect	Short & Long Term	The policy as amended is likely to continue to ensure residents are not disadvantaged, in terms of access to essential services and facilities, on the basis of income.

4. To improve and maintain health & well being of the population & reduce inequalities in health	✓+	✓+	Indirect	Long Term	The policy as amended is likely to continue help reduce inequalities, in terms of access to medical services and facilities.
5. To encourage the use of sustainable methods of transport to reduce negative effects on the environment.	~	~	~	~	No obvious links
6. To provide for sustainable levels of water use & supply & management.	✓	✓	Indirect	Short & Long Term	Any affordable housing built under this policy will be required to meet a certain level of water efficiency as required by the Code for Sustainable Homes.
7. To maintain & enhance biodiversity.	~	~	~	~	No obvious links
8. To preserve & enhance the landscape and townscape character of Chiltern & in particular, those areas of designated importance.	?	?	Indirect	Short & Long Term	The policy as amended is still likely to bring forward a significant amount of affordable housing in the built-up areas of the four targeted settlements, and may put pressures on the townscape character of these locations.
9. To conserve & where appropriate enhance the historic environment.	?	?	Indirect	Short & Long Term	A large amount of affordable housing in the built up areas of the four main towns may put pressures on the character and setting of the historic environment. Impacts will largely depend on the design and layout of individual schemes.
10. To reduce contributions to climate change through: a) Sustainable building practices; b) Maximising the potential for renewable energy & energy conservation.	✓	✓	Indirect	Short & Long Term	Affordable homes are required to meet sustainability standards in accordance with the Code for Sustainable Homes and therefore the policy is compatible with this objective.

11. To minimise the risk of flooding in relation to both new & existing development.	✓	✓	Indirect	Short & Long Term	Affordable homes are required to meet sustainability standards in accordance with the Code for Sustainable Homes - which includes standards relating to surface water drainage.
12. Minimise waste & then re-use or recover it through recycling, composting or energy recovery.	✓	✓			Affordable homes are required to meet sustainability standards in accordance with the Code for Sustainable Homes - which includes standards relating to waste and re-cycling.
13. To conserve soil resources & quality.	~	~	~	~	No obvious links
14. To improve the efficiency of land use through the re-use of existing buildings & previously developed land.	✓	✓	Indirect	Short & Long Term	The policy is likely to continue to ensure land in the District is used efficiently in bringing forward affordable units to meet identified needs.
15. To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness.	✓	✓	Indirect	Short & Long Term	The policy is likely to maintain a broad balance between housing, population and job opportunities.
16. To encourage a diverse economy which is focused on higher value added, lower impact activities.	✓+	✓+	Indirect	Short & Long Term	Providing a decent level of affordable units is likely to ensure a diverse supply of labour.
17. To develop & maintain a skilled workforce to support long-term competitiveness of the District.	✓+	✓+	Indirect	Long Term	Providing a decent level of affordable units is likely to ensure a diverse supply of labour which is likely to aid competitiveness.
18. To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region.	✓+	✓+	Indirect	Long Term	Providing affordable units is likely to provide a diverse labour supply, which will ensure high levels of employment across all areas of the Chiltern economy.

Summary

The main changes to this policy are that the standards within the policy have effectively become targets rather than requirements. The financial requirement of 20% of the prevailing market value of a 2 bedroom semi-detached property in the locality has been removed, and a commitment to negotiate where developers prove that providing a certain level of affordable units is unviable has been added. In reality, these changes may slightly reduce the amount of affordable units coming forward on sites, dependant upon site specific circumstances and market conditions, although it is difficult to say at this stage how profound an impact this will be.

Proposed change to Policy CS14: Sites for Gypsies and Travellers and Sites for Travelling Showpeople

	Original Assessment (CDN085)	Likely effect after change?	Direct or indirect effects?	Short term or long term effects?	Comments/Recommendations
Sustainability Objective	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	Will the policy directly affect the sustainability objective, or are the impacts more indirect?	Are the impacts of this policy likely to be felt in the short term (within the next 5 years) or long term (until and exceeding the end of the plan)?	What are the general effects of this policy thought to be? What recommendations can be made to ensure that this policy is more likely to satisfy the corresponding sustainability objective?
1. To provide existing and future residents with the opportunity to live in a decent home	✓+	✓+	Direct	Short & Long Term	Changes to this policy are likely to improve the opportunities for those from the Gypsy and Traveller or Travelling Showperson community to live on a site within the District where need arises.
2. The creation of safer places to live & work and to reduce anti-social behaviour	✓	✓	Indirect	Short & Long Term	Providing suitable, well located sites for Gypsies, Travellers and Travelling Showpeople to meet identified needs is likely to help reduce illegal encampments and minimise conflict with local residents.

3. To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities and services.	✓	?	Indirect	Short & Long Term	The revised policy indicated that some sites may need to be allocated in the Green Belt. Such sites are likely to have poorer access to the facilities within the main towns than sites in the built up areas.
4. To improve and maintain health & well being of the population & reduce inequalities in health	~	~	~	~	No obvious links
5. To encourage the use of sustainable methods of transport to reduce negative effects on the environment.	✓	?	Indirect	Short & Long Term	The intention to allocate sites in the Green Belt is likely to mean a reliance on the car.
6. To provide for sustainable levels of water use & supply & management.	?	?	Indirect	Long Term	An increase in the number of Gypsy, Traveller and Travelling Showpeople sites is likely to increase water use and may put pressure on existing water supply in the long term.
7. To maintain & enhance biodiversity.	?	?	Indirect	Short & Long Term	The allocation of Green Belt sites may put some biodiversity at risk, although any allocations are to be made in accordance with policy CS24.
8. To preserve & enhance the landscape and townscape character of Chiltern & in particular, those areas of designated importance.	✓	✓	Indirect	Short & Long Term	Criteria relating to landscape and townscape impacts within this policy have been removed in the revised version. However, any sites will be allocated in accordance with relevant policies elsewhere in the strategy such as CS4, CS20 and CS22. The potential allocation of sites within the Green Belt is likely to help preserve townscape quality.
9. To conserve & where appropriate enhance the historic environment.	?	✓	Indirect	Short & Long Term	The proposed change to the policy is likely to mean that sites will only be allocated in urban areas if a site is suitable. The impact on the historic environment is likely to be a key consideration.

10. To reduce contributions to climate change through: a) Sustainable building practices; b) Maximising the potential for renewable energy & energy conservation.	~	~	~	~	No obvious links
11. To minimise the risk of flooding in relation to both new & existing development.	✓	✓	Indirect	Short & Long Term	An allocations made under this revised policy will be in accordance with policies CS4 and CS26(h) and therefore impacts in terms of flooding should be minimised.
12. Minimise waste & then re-use or recover it through recycling, composting or energy recovery.	~	~	~	~	No obvious links
13. To conserve soil resources & quality.	?	?	Indirect	Long Term	The revision to this policy states that in exceptional circumstances, sites will be allocated in the Green Belt. This may mean valuable soil resources may be lost.
14. To improve the efficiency of land use through the re-use of existing buildings & previously developed land.	?	?	Indirect	Short & Long Term	The use of Green Belt land for Gypsy, Traveller and Travelling Showpeople sites is likely to be on previously undeveloped land. However, if sites are found in urban areas to meet identified needs, pdl land is likely to be used,
15. To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness.	~	~	~	~	No obvious links
16. To encourage a diverse economy which is focused on higher value added, lower impact activities.	~	~	~	~	No obvious links

17. To develop & maintain a skilled workforce to support long-term competitiveness of the District.	~	~	~	~	No obvious links
18. To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region.	~	~	~	~	No obvious links

Summary

Changes to this policy have resulted in the removal of all specific criteria to assess Gypsy, Traveller and Travelling Showpeople site allocations or applications, with instead a reliance on policies elsewhere in the strategy. The changes to the policy are likely to ensure that the needs of those within the Gypsy, Traveller and Travelling Showpeople communities are properly identified and met. The revised policy states that if sites cannot be found within settlement areas of the district excluded from the Green Belt, then sites will be allocated in the Green Belt. At the strategic level, this may cause some conflict with some of the SA objectives, particularly with objectives relating to accessibility, sustainable transport and the efficient use of land and soil resources. However, such allocations would be likely to help protect the historic environment and protect townscape assets across the District.

Proposed change to Policy CS16: Employment Land

	Original Assessment (CDN085)	Likely effect after change?	Direct or indirect effects?	Short term or long term effects?	Comments/Recommendations
Sustainability Objective	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	Will the policy directly affect the sustainability objective, or are the impacts more indirect?	Are the impacts of this policy likely to be felt in the short term (within the next 5 years) or long term (until and exceeding the end of the plan)?	What are the general effects of this policy thought to be? What recommendations can be made to ensure that this policy is more likely to satisfy the corresponding sustainability objective?
1. To provide existing and future residents with the opportunity to live in a decent home	?	✓	Indirect	Short & Long Term	Changes to this policy are likely to mean that some smaller employment sites within the built up areas excluded from the Green Belt may come forward for housing, under certain circumstances.
2. The creation of safer places to live & work and to reduce anti-social behaviour	✓+	✓+	Indirect	Short & Long Term	The policy is likely to continue to help ensure a mix of uses within built up areas, helping to moderate crime and anti-social behaviour.
3. To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities and services.	~	✓	Indirect	Short & Long Term	The policy as amended may allow for some smaller employment sites in built-up areas to be released for housing. Such sites are likely to have good levels of accessibility to services and facilities. The policy also allows changes of use from employment uses to community uses which generate employment, in line with PPS4.

4. To improve and maintain health & well being of the population & reduce inequalities in health	✓	✓	Indirect	Long Term	The policy continues to allow changes of use of employment sites within the built up areas excluded from the Green Belt to community uses such as a health facility.
5. To encourage the use of sustainable methods of transport to reduce negative effects on the environment.	?	?	Indirect	Short & Long Term	The changes of use now allowed within the policy may encourage more sustainable travel practices, but at this stage the outcome remains uncertain.
6. To provide for sustainable levels of water use & supply & management.	?	?	Indirect	Short & Long Term	Impacts on water supply and use resulting from this policy will largely depend on the types of employment uses and those that may come forward to replace employment land over the plan period.
7. To maintain & enhance biodiversity.	?	✓	Indirect	Short & Long Term	The policy is unlikely to have a significant impact on biodiversity assets and is therefore compatible. The policy states that any changes of use should have no greater environmental/amenity impact than a Class B employment Use.
8. To preserve & enhance the landscape and townscape character of Chiltern & in particular, those areas of designated importance.	?	✓	Indirect	Short & Long Term	The policy is unlikely to have a significant impact on landscape and townscape character and is therefore compatible. The policy states that any changes of use should have no greater environmental/amenity impact than a Class B employment Use. In some cases, changing the use of a run down former employment site may re-vitalise and improve the surrounding townscape character.
9. To conserve & where appropriate enhance the historic environment.	?	✓	Indirect	Short & Long Term	The policy is unlikely to have a significant impact on the historic environment and is therefore compatible. The policy states that any changes of use should have no greater environmental/amenity impact than a Class B employment Use. In some cases, changing the use of a run down former employment site may re-vitalise and improve the setting of the historic environment.

10. To reduce contributions to climate change through: a) Sustainable building practices; b) Maximising the potential for renewable energy & energy conservation.	✓	?	Indirect	Short & Long Term	Impacts of this policy are uncertain, although employment uses will be required to meet the requirements of policy CS4(g) and CS5.
11. To minimise the risk of flooding in relation to both new & existing development.	?	?	Indirect	Short & Long Term	Impacts of this policy in relation to flooding are uncertain, although any development of this nature will be required to meet the requirements of policy CS26.
12. Minimise waste & then re-use or recover it through recycling, composting or energy recovery.	✓	?	Indirect	Short & Long Term	Impacts of this policy in relation to waste remain uncertain, although any development will be required to meet the requirements of policy CS4(f) and standards set by building regulations.
13. To conserve soil resources & quality.	?	?	Indirect	Short & Long Term	The policy does not give any locational constraints for employment land which is replaced elsewhere, although it is likely such land will not be located in the open countryside.
14. To improve the efficiency of land use through the re-use of existing buildings & previously developed land.	?	✓	Direct	Short & Long Term	Changes to this policy allow redundant employment sites to be released for housing or other community uses in exceptional circumstances. This is likely to make efficient use of previously developed land.
15. To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness.	✓+	✓+	Direct	Long Term	The policy maintains its main thrust to protect employment land unless in exceptional circumstances. It is therefore likely to continue to promote economic growth and competitiveness in the District.
16. To encourage a diverse economy which is focused on higher value added, lower impact activities.	✓+	?	Direct	Long Term	The policy will continue to protect the majority of employment sites, although smaller employment sites which provide spaces for lower impact activities may be lost.

17. To develop & maintain a skilled workforce to support long-term competitiveness of the District.	✓ +	✓ +	Direct	Long Term	The policy should maintain the most of the existing skill base and therefore supports competitiveness.
18. To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region.	✓ +	✓ +	Direct	Long Term	The changes to the policy are unlikely to significantly effect the amounts of employment available in the District.

Summary

The changes made to this policy mean that some smaller employment sites, too small to be considered against 'saved' policies E2 and E3, subject to certain criteria being met, may be lost for residential purposes. Whilst this may slightly reduce the range of employment sites and types of activities in the District in the long term, it is likely to have positive repercussions in terms of meeting the overall housing requirement; fostering accessibility; and protecting townscape and the historic environment. The changes to the policy will also inherently promote the efficient use of sites which may no longer demonstrate demand for employment purposes.

Appendix 4: Extract from Core Strategy: Strategic Options, Sustainability Appraisal Report June 2008 (Taken from Section 4.0, p8-13)

Alternative Scenario 1

Urban Concentration – Concentrating housing development within all the larger urban areas, primarily on previously developed land and at medium to high densities. Some limited housing development would be allowed in smaller towns and villages, and some development would be permitted within the Green Belt on previously developed land. New employment and retail accommodation would be limited to that provided through small-scale infill schemes and the intensification of existing areas.

Alternative Scenario 2

Targeted Expansion of Amersham and Chesham Urban Areas – Concentrating housing development in the most accessible settlements of Amersham and Chesham, and boosting the shopping, employment and community facilities available in those towns. Some new housing and employment development would be required on Green Belt land, adjacent to Amersham and Chesham.

Alternative Scenario 3

Targeted Expansion of Amersham, Chesham and Chalfont St Peter Urban Areas - Concentrating housing development in the most accessible settlements of Amersham, Chesham and Chalfont St Peter, and boosting the shopping, employment and community facilities available in those towns. Some new housing and employment development would be required on Green Belt land, adjacent to Amersham, Chesham and Chalfont St Peter.

Alternative Scenario 4

Dispersed Pattern – Dispersed pattern of development, with a combination of development within, and on the edge of towns and villages. Some new housing development would occur in the Green Belt, on greenfield land, as well as on previously developed sites. New employment and retail accommodation would be principally limited to that provided through small-scale infill schemes and the intensification of existing areas.

Key

Major positive	++
Minor positive	+
Neutral	0
Minor negative	-
Major negative	--
Uncertain	?

Summary of the Sustainability Appraisal of the Alternative Scenarios (for full testing results see CDN050)

Sustainability Objective		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Commentary
Social	1. Housing	-	+	+	++	Scenario 1 would provide limited flexibility, and the least amount of affordable housing. Scenario 4 would enable the identification of contingency sites, and would do most to meet local housing needs (including the need for more affordable housing).
	2. Safety	0	0	0	0	No discernable difference between the scenarios.
	3. Accessibility	-	+?	+?	-	Scenarios 2 and 3 would result in the greatest concentration of new housing development in those settlements with the highest levels of accessibility. Scenario 4 would result in the most amount of development in smaller settlements.
	4. Health	0	+	+	0	Scenarios 2 and 3 perform marginally better, as there would be scope to deliver new areas of public open space under these scenarios, providing opportunities for active recreation.
Environmental	5. Transport	-?	++	++	-	With more of the new development accommodated in those settlements with the highest levels of accessibility, scenarios 2 and 3 would encourage more trips on foot and by bicycle. Access to public transport to higher order centres would also be better.
	6. Water Use	--?	-	-	--?	Scenarios 2 and 3 perform marginally better, as the larger sites associated with these scenarios could more easily incorporate provision for sustainable drainage and water recycling.
	7. Biodiversity	++?	-?	-?	-	The development of greenfield land would be largely avoided under Scenario 1, helping to protect biodiversity in urban fringe areas. Scenario 4 would result in the loss of less greenfield land than scenarios 2 and 3, but the land lost might be more sensitive.
	8. Landscape and Townscape	0	+	+	--?	Scenario 1 would do most to protect the landscape character of Chiltern, but the least to protect townscape character. Scenario 4 would have the most adverse impact on landscape character, but would probably do the most to help preserve townscape character.
	9. Historic Environment	-?	+	+	+	Scenario 1 would require development at medium to high densities, with a potentially adverse impact on the historic environment.

	10. Climate Change	0	+	+	0	Scenarios 2 and 3 perform marginally better, as the larger sites associated with these scenarios could more easily incorporate renewable energy technologies.
	11. Flood Risk	0?	0	0	0	No discernable difference between the scenarios.
	12. Waste	0	0	0	0	No direct relationship.
	13. Soil	+	--?	--?	-	Scenario 1 would largely avoid the development of greenfield land, helping to conserve soil resources. Scenario 4 performs better than scenarios 2 and 3, as less greenfield land would be lost to development.
	14. Land Use	++	--	--	-	Scenarios 2 and 3 would not encourage the most efficient use of previously developed land and buildings. They would result in the greatest amount of new development on greenfield land. Scenario 1 would encourage new development at medium to high densities in settlements across the District.
Economic	15. Economic Growth	-	+	+	-?	None of the scenarios would encourage significant economic growth. Scenario 1 provides the least flexibility, with no new employment land provision proposed. Scenario 4 would allow some replacement provision, whilst scenarios 2 and 3 would permit new employment land sites at Amersham, Chesham (and Chalfont St Peter).
	16. Diversity	0?	0?	0?	0?	The impact of each scenario is mixed and uncertain. Scenario 1 might do more to retain economic diversity, but would do less to encourage a greater focus on higher value-added activities. The impact of scenarios 2, 3 and 4 would probably be the converse.
	17. Workforce	-?	+	+	++	Scenario 4 would do most to support the local workforce, by providing the most affordable and key worker housing.
	18. Employment	--?	-?	-?	-?	The impact of each scenario is mixed and uncertain. Scenario 1 would carry the greatest risk of employment sites being redeveloped without scope for new provision being made on alternative sites.

Appendix 5: Appraisal of Housing Target Alternatives – Testing Tables

Alternative housing target: 2,550-2,900

	Likely effect?	Direct or indirect effects?	Short term or long term effects?	Comments/Recommendations
Sustainability Objective	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	Will the policy directly affect the sustainability objective, or are the impacts more indirect?	Are the impacts of this policy likely to be felt in the short term (within the next 5 years) or long term (until and exceeding the end of the plan)?	What are the general effects of this policy thought to be? What recommendations can be made to ensure that this policy is more likely to satisfy the corresponding sustainability objective?
1. To provide existing and future residents with the opportunity to live in a decent home	✓+	Direct	Long Term	An increase in the overall housing target from 2,400 to between 2,550 and 2,900 is likely to increase opportunities for current and future residents to live in a decent home.
2. The creation of safer places to live & work and to reduce anti-social behaviour	✓	Indirect	Long Term	The range when considered in the context of the chosen spatial strategy, maintains a focus on the main urban areas which is likely to help a mix of uses within urban areas which should help create safer places to live and work.

<p>3. To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities and services.</p>	<p>✓</p>	<p>Direct</p>	<p>Long Term</p>	<p>This housing target, when set within the context of the chosen strategy, still allocates a very large proportion of the total target to the main settlements, which will ensure a good level of accessibility to essential services and facilities.</p>
<p>4. To improve and maintain health & well being of the population & reduce inequalities in health</p>	<p>✓</p>	<p>Indirect</p>	<p>Long Term</p>	<p>This housing target, when set within the context of the chosen strategy, continues to allocate a large proportion of dwellings to the main settlements excluded from GB and AONB and therefore maximises access to essential medical facilities in these towns. Opportunities for walking and cycling are also likely to be maintained under this strategy.</p>
<p>5. To encourage the use of sustainable methods of transport to reduce negative effects on the environment.</p>	<p>✓</p>	<p>Indirect</p>	<p>Short & Long Term</p>	<p>This housing target, when set within the context of the chosen strategy, maintains a focus on urban areas which is likely to promote the use of non-car modes of transport, including public transport, walking and cycling.</p>
<p>6. To provide for sustainable levels of water use & supply & management.</p>	<p>?</p>	<p>Indirect</p>	<p>Long Term</p>	<p>There are identified water resource and use issues in the District. An increase in the number of dwellings planned over the plan period may have impacts in terms of sustainable water use, unless standards for sustainable water use are introduced.</p>
<p>7. To maintain & enhance biodiversity.</p>	<p>✓</p>	<p>Indirect</p>	<p>Short & Long Term</p>	<p>This housing target, when set within the context of the chosen strategy, maintains an urban focus which is likely to protect open countryside and biodiversity assets.</p>
<p>8. To preserve & enhance the landscape and townscape character of Chiltern & in particular, those areas of designated importance.</p>	<p>?</p>	<p>Indirect</p>	<p>Short & Long Term</p>	<p>Whilst the housing target, when set within the context of the chosen strategy, is likely to protect natural landscapes by concentrating a larger number of housing in non AONB and GB areas, this may put pressures on maintaining high quality townscape character.</p>

9. To conserve & where appropriate enhance the historic environment.	?	Indirect	Short & Long Term	An increasing in housing numbers across the District has the potential to put pressures on the character and setting of the historic environment in the four main urban areas, although this is likely to be mitigated by policy elsewhere in the strategy.
10. To reduce contributions to climate change through: a) Sustainable building practices; b) Maximising the potential for renewable energy & energy conservation.	✓	Indirect	Short & Long Term	This housing target, when set within the context of the chosen strategy, is unlikely to inhibit the use of sustainable building practises and use of renewable energy sources.
11. To minimise the risk of flooding in relation to both new & existing development.	?			Some areas of the four targeted settlements are already susceptible to surface water flooding, which changes made to this policy are likely to exacerbate. However, policies CS4 and CS26 remain in place to mitigate against any flooding issues.
12. Minimise waste & then re-use or recover it through recycling, composting or energy recovery.	~	~	~	No obvious links
13. To conserve soil resources & quality.	✓	Indirect	Short & Long Term	It is unlikely that an increase in housing will lead to any significant development in the open countryside, thus continuing to protect soil resources.
14. To improve the efficiency of land use through the re-use of existing buildings & previously developed land.	?	Indirect	Short & Long Term	Changes to PPS3 (Housing) mean that residential gardens are no longer classed as previously developed land (PDL). An increased amount of housing in the main settlements is likely to maintain a reliance on such sites.

15. To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness.	✓ +	Direct	Short & Long Term	Any increase in the housing figure is likely to continue to promote a close correlation between jobs and housing in the main settlements.
16. To encourage a diverse economy which is focused on higher value added, lower impact activities.	~	~	~	No obvious links
17. To develop & maintain a skilled workforce to support long-term competitiveness of the District.	✓	Indirect	Short & Long Term	Providing between 2,550 and 2,900 houses is likely to ensure a continuing supply of labour over the plan period, assuming job opportunities are maintained or increased.
18. To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region.	~	~	~	No obvious links

Summary

An alternative housing target of between 2,550 and 2,900, based on an assumed delivery rate of 45% of total housing yield from the SHLAA, is likely to increase opportunities for current and future residents to live in a decent home, increasing the likely yield of affordable housing. When set within the context of the chosen spatial strategy (concentration on the four main settlements excluded from the Green Belt and AONB) this range is likely to foster a good level of accessibility to essential services and facilities, including health facilities, in the main towns and support sustainable methods of transport. However, an increase in housing may put added pressures on townscape character and the historic environment and existing surface water flooding problems - such issues will need to be managed by policies elsewhere in the strategy. In reality, the exact extent of the impacts will be dependent upon whether the lower or upper end of the range is realised.

Alternative housing target: 2,650 - 2,900

	Likely effect?	Direct or indirect effects?	Short term or long term effects?	Comments/Recommendations
Sustainability Objective	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	Will the policy directly affect the sustainability objective, or are the impacts more indirect?	Are the impacts of this policy likely to be felt in the short term (within the next 5 years) or long term (until and exceeding the end of the plan)?	What are the general effects of this policy thought to be? What recommendations can be made to ensure that this policy is more likely to satisfy the corresponding sustainability objective?
1. To provide existing and future residents with the opportunity to live in a decent home	✓+	Direct	Long Term	An increase in the overall housing target from 2,400 to between 2,650 and 2,900 is likely to increase opportunities for current and future residents to live in a decent home.
2. The creation of safer places to live & work and to reduce anti-social behaviour	✓	Indirect	Long Term	The range when considered in the context of the chosen spatial strategy, maintains a focus on the main urban areas which is likely to help a mix of uses within urban areas which should help create safer places to live and work.
3. To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities and services.	✓	Direct	Long Term	This housing target, when set within the context of the chosen strategy, still allocates a very large proportion of the total target to the main settlements, which will ensure a good level of accessibility to essential services and facilities.

4. To improve and maintain health & well being of the population & reduce inequalities in health	✓	Indirect	Long Term	This housing target, when set within the context of the chosen strategy, continues to allocate a large proportion of dwellings to the main settlements excluded from GB and AONB and therefore maximises access to essential medical facilities in these towns. Opportunities for walking and cycling are also likely to be maintained under this strategy.
5. To encourage the use of sustainable methods of transport to reduce negative effects on the environment.	✓	Indirect	Short & Long Term	This housing target, when set within the context of the chosen strategy, maintains a focus on urban areas which is likely to promote the use of non-car modes of transport, including public transport, walking and cycling.
6. To provide for sustainable levels of water use & supply & management.	?	Indirect	Long Term	There are identified water resource and use issues in the District. An increase in the number of dwellings planned over the plan period may have impacts in terms of sustainable water use, unless standards for sustainable water use are introduced.
7. To maintain & enhance biodiversity.	✓	Indirect	Short & Long Term	This housing target, when set within the context of the chosen strategy, maintains an urban focus which is likely to protect open countryside and biodiversity assets.
8. To preserve & enhance the landscape and townscape character of Chiltern & in particular, those areas of designated importance.	?	Indirect	Short & Long Term	Whilst the housing target, when set within the context of the chosen strategy, is likely to protect natural landscapes by concentrating a larger number of housing in non AONB and GB areas, this may put pressures on maintaining high quality townscape character.
9. To conserve & where appropriate enhance the historic environment.	?	Indirect	Short & Long Term	An increasing in housing numbers across the District has the potential to put pressures on the character and setting of the historic environment in the four main urban areas, although this is likely to be mitigated by policy elsewhere in the strategy.
10. To reduce contributions to climate change through: a) Sustainable building practices; b) Maximising the potential for renewable energy & energy conservation.	✓	Indirect	Short & Long Term	This housing target, when set within the context of the chosen strategy, is unlikely to inhibit the use of sustainable building practises and use of renewable energy sources.

11. To minimise the risk of flooding in relation to both new & existing development.	?			Some areas of the four targeted settlements are already susceptible to surface water flooding, which an increase in the dwelling target may exacerbate. However, policies CS4 and CS26 remain in place to mitigate against any flooding issues.
12. Minimise waste & then re-use or recover it through recycling, composting or energy recovery.	~	~	~	No obvious links
13. To conserve soil resources & quality.	✓	Indirect	Short & Long Term	It is unlikely that this housing target, when set within the context of the chosen strategy, will lead to any significant development in the open countryside, thus continuing to protect soil resources.
14. To improve the efficiency of land use through the re-use of existing buildings & previously developed land.	?	Indirect	Short & Long Term	Changes to PPS3 (Housing) mean that residential gardens are no longer classed as previously developed land (PDL). An increased amount of housing in the main settlements is likely to maintain a reliance on such sites.
15. To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness.	✓ +	Direct	Short & Long Term	Any increase in the housing figure is likely to continue to promote a close correlation between jobs and housing in the main settlements.
16. To encourage a diverse economy which is focused on higher value added, lower impact activities.	~	~	~	No obvious links
17. To develop & maintain a skilled workforce to support long-term competitiveness of the District.	✓	Indirect	Short & Long Term	Providing between 2,650 and 2,900 houses is likely to ensure a continuing supply of labour over the plan period, assuming job opportunities are maintained or increased.

<p>18. To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region.</p>	<p>~</p>	<p>~</p>	<p>~</p>	<p>No obvious links</p>
---	----------	----------	----------	-------------------------

Summary

An alternative housing target of between 2,650 and 2,900, as set out in the Inspector's post hearing note (ID/14), is likely to increase opportunities for current and future residents to live in a decent home, increasing the likely yield of affordable housing. When set within the context of the chosen spatial strategy (concentration on the four main settlements excluded from the Green Belt and AONB) this range is likely to foster a good level of accessibility to essential services and facilities, including health facilities, in the main towns and support sustainable methods of transport. However, an increase in housing may put added pressures on townscape character and the historic environment and existing surface water flooding problems - such issues will need to be managed by policies elsewhere in the strategy. In reality, the impacts of this policy are likely to be very similar to an alternative range of between 2,550 and 2,900. However, the exact extent of the impacts will be dependent upon whether the lower or upper end of the range is realised.

Alternative housing target: 2,800 - 2,900

	Likely effect?	Direct or indirect effects?	Short term or long term effects?	Comments/Recommendations
Sustainability Objective	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	Will the policy directly affect the sustainability objective, or are the impacts more indirect?	Are the impacts of this policy likely to be felt in the short term (within the next 5 years) or long term (until and exceeding the end of the plan)?	What are the general effects of this policy thought to be? What recommendations can be made to ensure that this policy is more likely to satisfy the corresponding sustainability objective?
1. To provide existing and future residents with the opportunity to live in a decent home	✓+	Direct	Long Term	An increase in the housing target from 2,400 to between 2,800 and 2,900 is likely to increase the opportunity for people to live in a decent home in the District, and will maximise opportunities to bring forward affordable houses.
2. The creation of safer places to live & work and to reduce anti-social behaviour	✓	Indirect	Long Term	This target, when set within the context of the chosen spatial strategy, is likely to result in a mix of uses in urban areas, helping to maintain safer environments in the long term.
3. To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities and services.	✓+	Direct	Long Term	This target, when set within the context of the chosen spatial strategy, will mean a larger proportion of dwellings are located within the four main built up areas excluded from the Green Belt and AONB. This is likely to lead to a good level of accessibility.

4. To improve and maintain health & well being of the population & reduce inequalities in health	✓	Indirect	Long Term	This target, when set within the context of the chosen spatial strategy, is likely to concentrate development in the areas served by essential health facilities.
5. To encourage the use of sustainable methods of transport to reduce negative effects on the environment.	✓	Indirect	Short & Long Term	This target, when set within the context of the chosen spatial strategy, is likely to concentrate development in the areas served public transport networks, close to services and facilities which is likely to promote non-car modes of transport such as walking and cycling.
6. To provide for sustainable levels of water use & supply & management.	?	Indirect	Long Term	Given existing issues surrounding water use and supply in Chiltern, an increased housing target of 2,800-2,900 dwellings is likely to lead to a continuation of these issues, although policies elsewhere in the Core Strategy are likely to be in place to help mitigate this.
7. To maintain & enhance biodiversity.	✓	Indirect	Short & Long Term	This target, when set within the context of the chosen spatial strategy, is likely to concentrate development in built-up areas away from the open countryside and biodiversity assets.
8. To preserve & enhance the landscape and townscape character of Chiltern & in particular, those areas of designated importance.	?	Indirect	Short & Long Term	Whilst the housing target, when set within the context of the chosen strategy, is likely to protect natural landscapes by concentrating a larger number of houses in non AONB and GB areas, this may increase pressures on maintaining high quality townscape character.
9. To conserve & where appropriate enhance the historic environment.	?	Indirect	Short & Long Term	Whilst the housing target, when set within the context of the chosen strategy, is likely to protect natural landscapes by concentrating a larger number of houses in non AONB and GB areas, this may increase pressures on the setting of the historic environment.
10. To reduce contributions to climate change through: a) Sustainable building practices; b) Maximising the potential for renewable energy & energy conservation.	✓	Indirect	Short & Long Term	This housing target, when set within the context of the chosen strategy, is unlikely to inhibit the use of sustainable building practises and use of renewable energy sources. A higher number of new dwellings may make some renewable energy schemes more viable.

11. To minimise the risk of flooding in relation to both new & existing development.	?			Some areas of the four targeted settlements are already susceptible to surface water flooding, which a higher housing target is likely to exacerbate. However, policies CS4 and CS26 remain in place to mitigate against any flooding issues.
12. Minimise waste & then re-use or recover it through recycling, composting or energy recovery.	~	~	~	No obvious links
13. To conserve soil resources & quality.	✓	Indirect	Short & Long Term	This target, when set within the context of the chosen spatial strategy, is likely to concentrate development in built-up areas away from the open countryside and valuable soil resources.
14. To improve the efficiency of land use through the re-use of existing buildings & previously developed land.	?	Indirect	Short & Long Term	Changes to PPS3 (Housing) mean that residential gardens are no longer classed as previously developed land (PDL). An increased amount of housing in the main settlements is likely to maintain a reliance on such sites.
15. To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness.	✓+	Direct	Short & Long Term	Any increase in the housing figure is likely to continue to promote a close correlation between jobs and housing in the main settlements.
16. To encourage a diverse economy which is focused on higher value added, lower impact activities.	~	~	~	No obvious links
17. To develop & maintain a skilled workforce to support long-term competitiveness of the District.	✓	Indirect	Short & Long Term	Providing between 2,800 and 2,900 additional houses is likely to ensure a continuing supply of labour over the plan period, assuming job opportunities are maintained or increased.
18. To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region.	~	~	~	No obvious links

Summary

This housing target increases the number of dwellings, compared to the submitted version, by at least 400 dwellings. The lower figure is based on a delivery rate of 75% of the total dwelling yield from the Council's SHLAA and the higher is the requirement as set out in the South East Plan. Overall, this higher target is likely to increase opportunities for current and future residents to live in a decent home in the District and maximise the amount of affordable housing brought forward over the plan period. When set within the context of the chosen spatial strategy, a higher number of dwellings are likely to be brought forward within the built up areas of the four main settlements excluded from the Green Belt and AONB. This is likely to maximise accessibility to essential services and facilities, although is likely to lead to pressures on townscape, the historic environment and existing surface water flooding problems. These issues will need to be addressed elsewhere in the Core Strategy. At this strategic level, there is unlikely to be any significant differences in achieving a figure of 2,800 or 2,900, in terms of sustainability.

Alternative housing target: 2,900

	Likely effect?	Direct or indirect effects?	Short term or long term effects?	Comments/Recommendations
Sustainability Objective	✓+ Major positive ✓ Minor positive ? Uncertain X Negative ~ Neutral	Will the policy directly affect the sustainability objective, or are the impacts more indirect?	Are the impacts of this policy likely to be felt in the short term (within the next 5 years) or long term (until and exceeding the end of the plan)?	What are the general effects of this policy thought to be? What recommendations can be made to ensure that this policy is more likely to satisfy the corresponding sustainability objective?
1. To provide existing and future residents with the opportunity to live in a decent home	✓+	Direct	Long Term	An increase in the housing target to 2,900 is likely to increase the opportunity for people to live in a decent home in the District, and will maximise opportunities to bring forward affordable houses.

2. The creation of safer places to live & work and to reduce anti-social behaviour	✓	Indirect	Long Term	This target, when set within the context of the chosen spatial strategy, is likely to result in a mix of uses in urban areas, helping to maintain safer environments in the long term.
3. To improve accessibility to essential services & facilities to provide opportunities to obtain good access to high quality health, education, recreation & other community facilities and services.	✓+	Direct	Long Term	This target, when set within the context of the chosen spatial strategy, will mean a larger proportion of dwellings are located within the four main built up areas excluded from the Green Belt and AONB. This is likely to lead to a good level of accessibility.
4. To improve and maintain health & well being of the population & reduce inequalities in health	✓	Indirect	Long Term	This target, when set within the context of the chosen spatial strategy, is likely to concentrate development in the areas served by essential health facilities.
5. To encourage the use of sustainable methods of transport to reduce negative effects on the environment.	✓	Indirect	Short & Long Term	This target, when set within the context of the chosen spatial strategy, is likely to concentrate development in the areas served public transport networks, close to services and facilities which is likely to promote non-car modes of transport such as walking and cycling.
6. To provide for sustainable levels of water use & supply & management.	?	Indirect	Long Term	Given existing issues surrounding water use and supply in Chiltern, an increased housing target of 2,900 dwellings is likely to lead to a continuation of these issues, although policies elsewhere in the Core Strategy are likely to be in place to help mitigate this.
7. To maintain & enhance biodiversity.	✓	Indirect	Short & Long Term	This target, when set within the context of the chosen spatial strategy, is likely to concentrate development in built-up areas away from the open countryside and biodiversity assets.

8. To preserve & enhance the landscape and townscape character of Chiltern & in particular, those areas of designated importance.	?	Indirect	Short & Long Term	Whilst the housing target, when set within the context of the chosen strategy, is likely to protect natural landscapes by concentrating a larger number of houses in non AONB and GB areas, this may increase pressures on maintaining high quality townscape character.
9. To conserve & where appropriate enhance the historic environment.	?	Indirect	Short & Long Term	Whilst the housing target, when set within the context of the chosen strategy, is likely to protect natural landscapes by concentrating a larger number of houses in non AONB and GB areas, this may increase pressures on the setting of the historic environment.
10. To reduce contributions to climate change through: a) Sustainable building practices; b) Maximising the potential for renewable energy & energy conservation.	✓	Indirect	Short & Long Term	This housing target, when set within the context of the chosen strategy, is unlikely to inhibit the use of sustainable building practises and use of renewable energy sources. A higher number of new dwellings may make some renewable energy schemes more viable.
11. To minimise the risk of flooding in relation to both new & existing development.	?			Some areas of the four targeted settlements are already susceptible to surface water flooding, which a higher housing target is likely to exacerbate. However, policies CS4 and CS26 remain in place to mitigate against any flooding issues.
12. Minimise waste & then re-use or recover it through recycling, composting or energy recovery.	~	~	~	No obvious links
13. To conserve soil resources & quality.	✓	Indirect	Short & Long Term	This target, when set within the context of the chosen spatial strategy, is likely to concentrate development in built-up areas away from the open countryside and valuable soil resources.

14. To improve the efficiency of land use through the re-use of existing buildings & previously developed land.	?	Indirect	Short & Long Term	Changes to PPS3 (Housing) mean that residential gardens are no longer classed as previously developed land (PDL). An increased amount of housing in the main settlements is likely to maintain a reliance on such sites.
15. To achieve a broad balance between housing, population & employment whilst encouraging economic growth and competitiveness.	✓ +	Direct	Short & Long Term	Any increase in the housing figure is likely to continue to promote a close correlation between jobs and housing in the main settlements.
16. To encourage a diverse economy which is focused on higher value added, lower impact activities.	~	~	~	No obvious links
17. To develop & maintain a skilled workforce to support long-term competitiveness of the District.	✓	Indirect	Short & Long Term	Providing 2,900 additional houses is likely to ensure a continuing supply of labour over the plan period, assuming job opportunities are maintained or increased.
18. To ensure high & stable levels of employment so everyone can benefit from the economic growth of the region.	~	~	~	No obvious links

Summary

This housing target increases the number of dwellings, compared to the submitted version, by 500 dwellings. This figure is set within the South East Plan. Overall, this higher target is likely to increase opportunities for current and future residents to live in a decent home in the District, and maximise the amount of affordable housing brought forward over the plan period. When set within the context of the chosen spatial strategy, a higher number of dwellings are likely to be brought forward within the built up areas of the four main settlements excluded from the Green Belt and AONB. This is likely to maximise accessibility to essential services and facilities, although is likely to lead to pressures on townscape, the historic environment and existing surface water flooding problems. These issues will need to be addressed elsewhere in the Core Strategy.

Appendix 6:Comment Form



Chiltern
District Council

*Consultee Reference ID:
(office use only)

Sustainability Appraisal Comment Form

Local Development Framework – Examination Stage

Sustainability Appraisal of the Proposed Significant Changes to the Core Strategy for Chiltern District - June 2011

This form has two parts – **PART A** (Respondent Details) which **will not** be published and **PART B** for comments, which will be published. If you wish to make more than one comment, please fill in a separate 'Part B' for each comment on a proposed change you make (you do not need to repeat Part A with every submission).

All comments must be received no later than 5.00pm on Friday 5th August 2011 – comments received after this date cannot be accepted

PART A – PERSONAL DETAILS

Personal Details*

Agent's Details (if applicable)

*if an agent is appointed, please complete only the title, name and organisation boxes below but complete the full contact details for the agent in column 2.

**Mandatory Fields

**Title

**First Name

**Last Name

Job Title
(if applicable)

Organisation
(if applicable)

**Address

Telephone Number

Email Address

*Signature of Agent or Respondent
(Confirming comments in **PART B** are duly made)

Date:

Chiltern District Council is the Data Controller for the purposes of the Data Protection Act 1998.

Please note: representations received on the SA Report on the Proposed Changes to the Core Strategy cannot be treated as confidential. All comments that have been duly made will be available for public inspection and, if practicable, will be published on the Council's website. However, no personal details, other than the Respondent's or Agent's name, will be made public and/or published.

PART B – COMMENTS

Please complete this section for each comment you wish to make

Please **do not include any personal details** other than your name in **PART B**, as this section will be made publically available and will be displayed on the Council's website.

Name of Respondent / Organisation:

1. Do you agree that that Council has appraised all the appropriate significant changes made to the Core Strategy for Chiltern District? If not, which other changes do you feel should also be subject to sustainability appraisal and why?

(Continue on separate sheet/expand box if necessary)

2. Has the Council appraised all reasonable* alternatives to the proposed changes? If not, what other reasonable alternatives should the Council have considered?

(Continue on separate sheet/expand box if necessary)

*** For guidance on what constitutes a reasonable alternative, please see Planning Advisory Service (PAS) guidance document entitled 'Local development frameworks: guidance on options generation and appraisal.'**

3. Do you agree with the Council's assessment of sustainability? If not what elements in particular do you disagree with?

8. If you have any other comments on the sustainability appraisal of the proposed significant changes to the Core Strategy, please use the box below