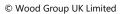
Appendix E: Appraisal of strategic housing growth options

Score	Description	Symbol
Significant Positive Effect	The option contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The option contributes to the achievement of the objective but not significantly.	+
Neutral	The option does not have any effect on the achievement of the objective	0
Minor Negative Effect	The option detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The option detracts significantly from the achievement of the objective.	
No Relationship	There is no clear relationship between the option and the achievement of the objective or the relationship is negligible.	~
Uncertain	The option has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	?

NB: where more than one symbol/colour is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.



SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
1. Housing To ensure that the housing stock meets the housing needs of Ashfield.	++	++/?	Likely Significant Effects Ashfield forms part of the Nottingham Outer Housing Market Area (HMA) along with the Districts of Mansfield and Newark and Sherwood. Ashfield has the highest population of the three authorities. The provision of 450-475 dwellings per annum (dpa) will meet the standard methodology for calculating housing need referenced in the NPPF. The higher growth option would see the provision of an additional 20% which would allow for greater flexibility in achieving the need required in the District through the identification of a greater range and choice of housing sites. However, care would have to be taken to avoid an oversupply of sites that could impede delivery rates. The higher growth figure may support opportunities for greater affordable housing provision. There are also potential positive implications for the type and mix of development including specialised housing. Housing delivery has declined in recent years with total net completions of Class C3, dwelling houses in 2017/18 (397), 2018/19 (300), 2019/20 (173) and 2020/21 (265) well below those experienced in 2015/16 (558) and 2016/17 (544). Both options would support opportunities to identify a range of sites to increase development well above the rates in the previous two monitoring years. The provision of 540-570 dpa would be higher than that seen in any monitoring year in the period 2011-2020 at the top of the range (with only completions in 2015/16 and 16/17 meeting the lower end of the range) and is 20% higher than the need figure against the standard methodology. Therefore, there is some question as to whether provision of a higher requirement would be achievable over the plan period. Additionally, the identification of a higher requirement may increase the likelihood of the District not being able to demonstrate sufficient delivery of housing, due to the implications of the Government's housing delivery test, which would reduce the Council's ability to direct housing to plan led locations. These impacts may be mitigated

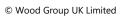


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SA Objective	Standard Methodology 450-475dpa (5,074-5,524)	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
	Preferred Option		
			 It is assumed that Local Plan policies relating to affordable housing provision will be designed to meet the need identified in the Housing Need Study. Uncertainties The extent to which new housing development meets local needs will be dependent on the mix of housing delivered (in terms of location, size, type and tenure) which is currently unknown.
2. Health To improve health and wellbeing and reduce health inequalities.	+/-	+/-	Likely Significant Effects The construction of the lower or higher growth figure has the potential to have a localised and short term negative effect on the health and wellbeing of residents who are in close proximity to development sites and along transport routes within the District. Effects may include, for example, stress related to disturbance, noise and vibration and respiratory problems exacerbated by construction traffic emissions and dust. However, these effects are expected to be temporary and not significant. Once dwellings are occupied there may be the potential for further adverse effects on health arising from, in particular, emissions to air associated with increased traffic movements, unless adequate mitigation is put in place. The extent to which new development promotes healthy lifestyles through, for example, walking and cycling will be in part dependent on its location and the accessibility of services, facilities, jobs and open space which is uncertain. The Ashfield Public Open Space Strategy (2016-2026) sets out how development can support improvements to the quality and quantity of open space in the District. Additional development within the District under both options could increase investment in health care facilities through developer contributions. However, without appropriate levels of investment, there is a risk that increased demand from new residents may undermine the quality of existing facilities. The higher levels of growth associated with the higher figure (540-570 dpa) increases the likelihood of positive and negative effects. The higher levels of growth provides greater potential for increased demand on healthcare facilities in the District and which, if not appropriately mitigated, may undermine the quality of service. Overall, both growth options have been assessed as having a mixed positive and negative effect on this objective. Mitigation Local Plan policies should ensure that development is not located in close proximity to unsuitable neighbouring uses.



SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
			 Local Plan policies should consider if/how accessibility to the countryside can be promoted as part of new development. New development should be located in close proximity to health care facilities. Consideration should be given to the distribution of new development vis-à-vis GP capacity/availability. Local Plan and Infrastructure Delivery Plan should ensure that health facilities and services are expanded to meet the additional need for services associated with additional housing. Assumptions None identified. Uncertainties The exact location of development.
3.Historic Environment To conserve and enhance Ashfield's historic environment, heritage assets and their settings.	-/?	-/?	Likely Significant Effects The District includes a number of designated historic sites and assets. This includes six Conservation Areas, 80 Listed Buildings, nine Scheduled Monuments and two Register Historic Parks and Gardens. The District also has a number of non-designated historic assets of local importance. Additionally, part of the north west of the District forms part of the setting of the Grade 1 listed Hardwick Hall and Old Hall which are prominent in the landscape. Housing growth could have an adverse effect on cultural heritage assets as a result of the direct loss of assets during construction or due to impacts on their setting during construction and once development has been completed. There may also be opportunities for housing growth to enhance the settings of heritage assets as well as access to them. The levels of housing need to be accommodated in both options are likely to have an adverse effect on local landscape and townscape character, although the magnitude of effects would be likely to be reduced through the application of the site selection methodology which seeks to protect historic assets. The level of effects associated with both housing figure options are likely to be similar to one another; although this will depend upon the selection of individual sites. However, as a basic principle, the magnitude of effect is likely to be increased commensurate with the higher scale of growth under the higher (540-570 dpa) figure compared to the lower standard methodology figure of 450-475 dpa. Overall, both housing options are considered to have a minor negative effect on this objective. However, the magnitude is uncertain. Mitigation Local Plan policies should ensure that historic environment is conserved and enhanced in accordance with the NPPF. Local Plan policies should promote high standards of architecture and urban design.



wood.

SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
			Assumptions • None identified. Uncertainties • The exact location of new development is unknown at this stage.
4.Community Safety To improve community safety, reduce crime and the fear of crime.	0	0	Likely Significant Effects The scale of growth in each housing growth option is not (of itself) considered to influence the ability to improve community safety, reduce crime and the fear of crime. The ability to do so depends on the inclusion of design features such as natural surveillance, appropriate lighting and shared spaces. These factors can only be determined through detailed design at the masterplanning/planning application stage and therefore the housing growth options are not considered to have an effect on this objective. Mitigation Local Plan policies should ensure that new development designs out crime. Assumptions None identified. Uncertainties None identified.
5.Social Inclusion Deprivation To improve social inclusion and to close the gap between the most deprived areas and the rest of Ashfield.	+	+	Residential development has the potential to improve the viability and vitality of existing shops, services and facilities in the areas where growth is located. New development may also encourage and support investment in existing, and the provision of new, services and facilities in the District through, for example, the receipt of developer contributions. This could enhance accessibility of these services. Both options would support the provision of a mix of good quality housing, including affordable housing, across various locations in the District, dependent on distribution. These effects may be greater with the higher growth option. However, it is recognised that viability is low across many areas of the District. Overall, both housing growth options have been assessed as having a minor positive effect on the achievement of this objective.

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SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
			 Mitigation Local Plan policies should support regeneration opportunities, where possible. Local Plan policies should consider the importance of social value arising from development. Development contributions should be sought towards community services and facilities. New development should be located close to services and facilities. Assumptions None identified. Uncertainties The location of development is unknown.
6. Biodiversity & Green Infrastructure To conserve, enhance and increase biodiversity levels and Green & Blue Infrastructure	-/?	-/?	Likely Significant Effects There are no internationally designated conservation sites within the District although there is a possible potential SPA (ppSPA) for Sherwood Forest, which is recognised as being important for breeding woodlark and nightjar, in the south and east of the District. There are nine SSSIs across Ashfield and several tracts of ancient woodland. There are also a number of Local Wildlife Sites (LWS) across the District and four Local Nature Reserves (LNR). It is assumed that development would not directly affect these sites, depending on location although housing growth under these options could have indirect negative effects on these assets due to, for example, disturbance arising from increased recreational activity and wild bird and mammal loss from cat predation. However, this is dependent on the location of future residential development. The limited availability of brownfield sites in Ashfield will result in the development of greenfield sites. Development on these sites is considered likely to affect biodiversity through potential loss of habitat. However, arable fields and new grass leys can have limited value for biodiversity. Consequently, the magnitude of any direct negative effects will be dependent on the existing biodiversity value of the sites developed. Commensurate with the scale of growth, the likelihood of adverse effects on biodiversity may be increased. Mitigation Local Plan policies should include policies that seek to conserve and enhance the District's biodiversity assets, green and blue infrastructure. The opportunities for biodiversity linkages through the Biodiversity Opportunity Mapping should be considered. Assumptions None identified.



SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
			Uncertainties • The location of residential development is unknown at this stage.
7.Landscape To protect enhance and manage the character and appearance of Ashfield's landscape /townscape, maintaining and strengthening local distinctiveness and sense of place.	+/-/?	+/-/?	Likely Significant Effects There are no landscape designations within the District but there are a range of features of natural, historic and cultural importance that contribute to the District's landscape and townscapes. The Greater Nottingham Landscape Character Assessment (2009) identifies that the District comprises character areas of Magnesium Limestone Ridge, Nottinghamshire Coalfields and Sherwood which form distinct landscapes. Housing growth could have an adverse effect on landscape character associated with the need to direct some development (under both housing figures) onto greenfield sites. However, the lower growth option provides greater potential for a higher proportion of growth to be delivered on previously developed land although there is a limited supply of brownfield sites within the District. The District has around 41% of land designated as Green Belt. A higher growth option increases the likelihood that there will be a requirement to release Green Belt land to accommodate the development. However, the release of Green Belt land may occur under both the lower and higher options. Development may also affect townscape and the visual amenity of residential and recreational receptors both in the short-term during construction and once development is complete. The general principle may be applied that the greater the number of houses the greater the effect on the landscape. However, this effect is dependent on the specific approach to meeting the identified need through policies and proposals within the Local Plan. Housing growth may also present opportunities to improve townscape which could have a positive effect on this objective in the short, medium and long term. The lower housing growth option (450-475 dpa) and higher figure (540-570 dpa) have been appraised as having a minor negative and minor positive effect against this objective. Mitigation Local Plan policies should contain policies on high quality design. Local Plan policies and proposals should seek to conserve and enhance

SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
8.Natural Resources To minimise the loss of natural resources including soils, greenfield land and the best quality agricultural land.	+/-/?	+//?	Likely significant effects The higher option (540-570 dpa) would involve the provision of around an additional 100 dpa. Both options would support some brownfield land redevelopment. This higher level of development would require a greater release of greenfield land with a smaller proportion of growth likely to make use of brownfield land. Much of the available brownfield land has been developed in the District so, unless new brownfield development sites become available, both options would rely on greenfield land release. Council monitoring shows that substantial areas of former employment land (33.22 hectares) have been reused for housing between 2001 and 2019. Greenfield release would likely be greater with the higher option. As a consequence, it is also likely that the ability to avoid the best and most versatile agricultural land (Grades 1 to 3) would be lessened with the higher option. Overall, the lower option (450-475 dpa) has been assessed as having mixed minor positive and negative effects. The higher option (540-570 dpa) has been assessed as having mixed minor positive and negative effects. However, the magnitude of the effects is dependent on the location of development. Mitigation • Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. • Local Plan policies should prioritise the reuse of brownfield land before greenfield land. Assumptions • None identified. Uncertainties • The exact location of development is unknown at this stage.
9.Air & noise pollution To reduce air pollution and the proportion of the local population subject to noise pollution.	-/?	-/?	Likely significant effects There is the potential for the construction and occupation of new residential development to have negative effects on air quality due to, for example, emissions generated from plant and HGV movements during construction and increased vehicle movements once construction is complete. Similarly, noise associated with construction of new dwellings would have adverse effects on the amenity of adjacent occupiers, although this would be temporary. In the long-term greater road congestion would increase levels of noise in the specific areas. Some development locations may also be more susceptible to noise pollution. For example, development close to the M1 is likely to have increased noise pollution linked to the motorway, or alternatively locations nearer large employers may have increased noise effects. There are no Air Quality Management Areas (AQMAs) currently in the District although increased car use could exacerbate congestion and lead to greater occurrences of poor air quality. However, greater levels of development may stimulate greater investment in public transport.





SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
			Overall, both options are considered to have minor negative However, until the location of new development has been determined, the likelihood of adverse effects occurring, and their magnitude is uncertain. Mitigation Local Plan policies should seek to reduce congestion. New development should be located to be accessible to key services, facilities and employment opportunities. Developments that may involve noise polluting activities should be located away from sensitive receptors, such as residential development. Assumptions It is assumed that proposals to ensure no sale of new diesel/petrol engine vehicles after 2035, which will lead to an increased proportion of e-vehicles over time, may benefit air quality over the long-term. Uncertainties The exact location of future development is uncertain at this time.
10.Water Quality To conserve and improve water quality and quantity.	-	-	Likely significant effects The Watercycle Study for Greater Nottingham and Ashfield (2010) indicated water resources in the East Midlands are significantly constrained with little opportunity to develop new water resource schemes. Any increase in housing provision will increase demand for water resources. The shortfall identified in the Watercycle Study (of water supply) is also identified in the more recent Severn Trent Water Resources Management Plan (WRMP, 2019) within the Nottinghamshire Water Resource Zone up but the WRMP19 proposes a range of demand and supply measures to ensure sufficient water resources can be maintained to 2025 (and in outline up to 2030). Both growth options will increase demand for water resources, and such changes will need to be addressed through the preparation of the next WRMP. The Watercycle Study for Greater Nottingham and Ashfield (2010) notes that there are no capacity constraints at Ashfield's Wastewater Treatment Works. The supporting evidence for the Environment Agency Humber Basin River Basin Management Plan (2015) identifies that further improvement to water quality in rivers and stream is also required. Both sub-options are considered to have minor negative effects on the achievement of this objective. However, higher growth may provide additional demand for water resources.



SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
			 Mitigation Local Plan policies should support water efficiency measures (including implementation of the optional requirement of 110 I/day for new residential development in Part G of the Building Regulations), the implementation of SuDs, and wastewater treatment capacity enhancements where necessary. Assumptions It is assumed that the Council will continue to liaise with Severn Trent regarding the planned level of growth. Uncertainties The exact location of developments and the potential impact on waterbodies is uncertain at this stage.
11.Waste To minimise waste and increase the re-use and recycling of waste materials.	-	-	Likely significant effects The construction of new dwellings will require raw materials and the generation of waste. During occupation waste will be generated by households, although there would be opportunities to integrate recycling best practice. Commensurate with the level of growth, it is expected that the development of 540-570 dpa would lead to the greater use of raw materials during construction and the use of materials and generation of waste during occupancy than the lower option (450-475 dpa). The potential for significant negative effects is therefore greater. Overall, both the lower and higher option have been assessed as having minor negative effects on this objective. Mitigation Local Plan policies should support the use of recycled and secondary materials in new development. The reuse of construction waste should be supported. Assumptions It is assumed that the Nottingham and Nottinghamshire Joint Waste Local Plan will make sufficient waste infrastructure provision available. Uncertainties The exact scale of waste associated with either operation is unknown at this stage.
12. Climate Change and Flood Risk To adapt to climate change by reducing and manage the risk of	0/?	0/?	Likely significant effects The Strategic Flood Risk Assessment (SFRA) (2009) identifies that the District has a relatively low risk of flooding from watercourses although some properties in Hucknall and Jacksdale are at risk. Flood risk is mainly away from the urban areas. However, it is recognised that additional water in the River Leen could cause flood issues for Nottingham to the south. It is considered that any adverse effects will be mitigated through the implementation of NPPF compliant Local Plan policies related to flood risk and sustainable drainage. New development proposals which may be at risk or pose a risk of flooding elsewhere would be subject to the strict





SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
flooding and the resulting detriment to people, property and the environment.			tests to ensure suitability. The selection of sites in the Local Plan, through the application of the site selection methodology, would also seek to avoid areas of high flood risk. Overall, both housing growth options are considered to have neutral effects on the achievement of this objective. However, the effects are uncertain at this stage and depend on the location of new development. Mitigation Site selection processes should help to avoid areas of highest flood risk (Flood Zones 2 and 3). Local Plan policies should ensure that new development avoids increasing all forms of flooding. Local Plan policies should support achievement of greenfield runoff rates in new development. Assumptions It is assumed that, where appropriate, development proposals would be accompanied by a site-specific Flood Risk Assessment (FRA) and that suitable flood alleviation measures would be incorporated into the design of new development where necessary to minimise flood risk. Uncertainties The exact location of development is unknown at this stage.
13.Climate Change and Energy Efficiency To adapt to climate change by minimise energy usage and to develop Ashfield's renewable energy resource, reducing dependency on non-renewable sources.	+/-	+/-	Likely significant effects Minor negative effects are anticipated to arise from housing growth generating an increase in greenhouse gases both during construction (e.g. due to emissions from HGV movements and plant and associated with embodied carbon in construction materials) and once development is complete (e.g. due to increased traffic generation and energy use in new dwellings). The scale of these effects will be most significant for the higher figure. The provision of new development provides the opportunity for more energy efficient houses and buildings (with more efficient boilers, insulation, and possible low carbon energy generation) which could mean that carbon generation per dwelling or person would be lower than for existing, older housing stock. This could help mitigate some of the effects. Indeed, higher levels of development could support opportunities for the provision of combined heat and power networks and provide greater flexibility for passive solar gain through effective layout and design. Overall, both options have been assessed as having positive and negative effects on achievement of this objective. Mitigation





SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
			 Local Plan policies should support the integration of energy efficient measures into the design of new buildings and through energy efficient layouts. Assumptions It is assumed that over the plan period there will be a decarbonisation of the electricity generation mix with renewable energy sources displacing fossil fuels. Uncertainties The exact magnitude of effects will be dependent on the design and location of development at the individual site level (which is currently uncertain). Housing growth may present opportunities to increase investment in transport infrastructure and renewable energy, including development of combined heat and power networks.
14.Travel and Accessibility To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys.	+/-	+/	Likely significant effects New residential development of either 450-475 dpa or 540-570 dpa would increase the levels of traffic in the District both during construction and when development is complete. This could result in additional congestion and highway capacity issues. However, both options have potential for positive effects. They could both stimulate greater investment in public transport across the District and both options would meet the housing need identified through the standard methodology. This could support delivery of the number of houses required to support the needs of workers in the area. It is recognised that the District has modest workforce containment with strong links to Nottingham. Potential higher growth above the standard methodology could therefore exacerbate community patterns adding to congestion experienced between Mansfield, Ashfield and Nottingham. Development close to junctions 27 and 28 could additionally increase flows via the M1. Overall, the lower option has been assessed as having mixed minor positive and minor negative effects and the higher option has been assessed as having mixed minor positive and significant negative effects. To some extent the magnitude of effects is dependent on travel choices and the location of new development. Mitigation Local Plan policies should support walking and cycling and seek contributions to public transport provision where possible. The development of green travel plans should be supported where possible. Local Plan policies should support the implementation of measures in the Nottinghamshire Local Transport Plan 3. Local Plan policies should promote access to services and facilities.



SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
			Assumptions None identified. Uncertainties The exact location of development is unknown at this stage.
15.Employment To create high quality employment opportunities including opportunities for increased learn and skills to meet the needs of the District.	+	+	Likely significant effects New residential development will support employment opportunities. Not only will jobs be created in the short term, through construction, in the longer-term new housing will boost the labour supply in the District and support new employment opportunities in the services and facilities required to support population growth. However, the long-term effects are dependent on the location of employment and whether residents can access employment in the District is dependent on the number, location and type of jobs created. Both options would meet the identified need in the District (based on the standard methodology) and ensure there is sufficient housing to meet the needs or workers who may otherwise commute into the District. Educational attainment is generally lower than average across the District. A number of schools in Hucknall, Kirkby-in-Ashfield and Sutton in Ashfield are currently at or near capacity. New residential development could add to these pressures. However, development of, larger or strategic sites (over a 1,000 homes) could support the development of single form primary school. Larger housing figures may therefore support the opportunity to identify sites with a quantum of housing that would support school provision. Overall, both options have been assessed as having minor positive effects on this objective. Mitigation • Local Plan and Infrastructure Delivery Plan should ensure that developer contributions support adequate provision of school places to meet additional need associated with additional housing. • The distribution of new development should consider school capacity information. Assumptions • It is assumed that larger developments (over 1,000 dwellings) could support onsite primary school provision. Uncertainties • The exact location of new development is unknown at this stage.
16. Economy To Improve the efficiency,	+	++	Likely significant effects





SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
competitiveness and adaptability of the local economy.			Housing development will generate economic benefits associated with construction e.g. direct job creation, supply chain benefits and increased spend in the local economy by contractors and construction workers. However, effects in this regard will be temporary and the extent to which the jobs that may be created benefit Ashfield's residents will depend on the number of jobs created and the recruitment policies of prospective employers. Additionally, local spend will be determined by these factors. In the medium- and longer-term new housing and associated population growth will in turn help enhance the viability and vitality of existing businesses within Kirby-in-Ashfield, Sutton-in-Ashfield and Hucknall. The higher growth option (540-570 dpa) would provide a scale of housing growth to support economic growth and as such it considered to have significant positive effects. Development at higher levels may help to stimulate and support a diversification of the economy which is currently dominated by manufacturing sector. Overall, both housing growth options have been assessed as having positive effects on this objective, with the higher (540-570 dpa) considered to have a significant positive effect due to benefits derived from the quantum of development proposed. Mitigation None identified. Assumptions None identified. Uncertainties The extent to which jobs and spend will be
17. Town Centres Increase the vitality and viability of Ashfield's town centres.	+	+	Likely significant effects Both options are considered to help support the town centres. The Ashfield Retail and Leisure Study (2016) identified that town centres of Hucknall, Kirby-in-Ashfield, Sutton in Ashfield are generally fulfilling their roles as town centres and are generally in good health with low vacancy rates, although Hucknall has suffered from increased vacancies in recent years. Additionally, the district includes a number of local shopping centres and shopping parades which provide more limited facilities but are not defined as town centres. Residential development under both the housing growth options is considered to help support the vibrancy and vitality of the town centres. The magnitude is somewhat dependent on the location of development and the links that can be developed to the town centres. Overall, both options have been assessed as having minor positive effects on this objective.





SA Objective	Standard Methodology 450-475dpa (5,074-5,524) Preferred Option	Flexible Buffer 540-570dpa (6,694–7,234)	Commentary
			Mitigation Local Plan policies should help support regeneration and investment in town centres. New development should be located in close proximity to services and facilities, Assumptions None identified. Uncertainties The exact location is unknown at this stage. The potential impacts of revised use class order and new permitted development rights on conversion of retail to residential.