

**Site Allocations Development Plan
Document: Proposed Submission Version
(Regulation 19)**

**Sustainability Appraisal -
Non-Technical Summary**

January 2024


Lambeth

Non-technical summary contents page

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1. Introduction

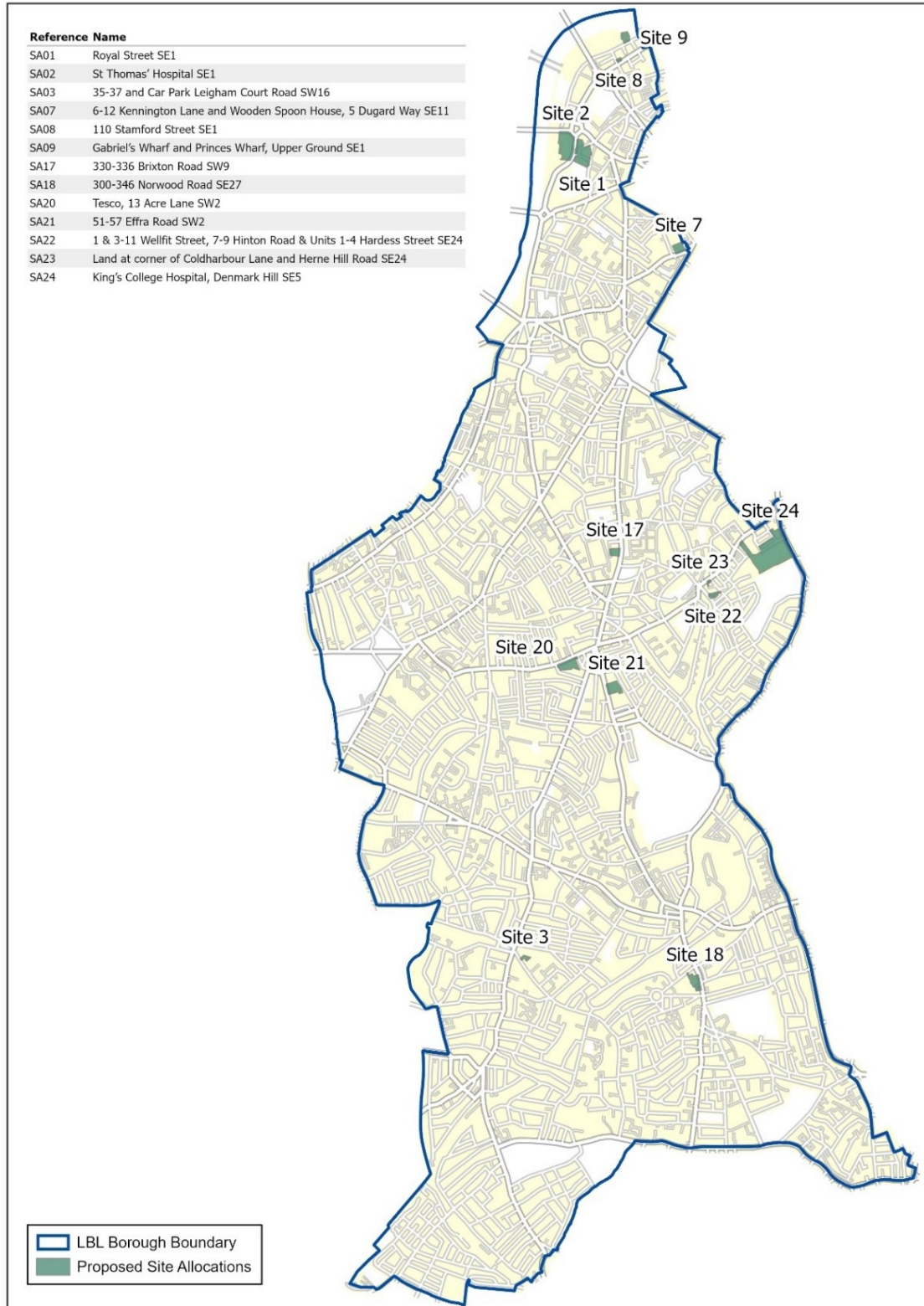
- 1.1 A Susta promotes sustainable development through the integration of social, environmental and economic considerations into the preparation of new planning documents. It is required by Section 39 of the Planning and Compulsory Purchase Act 2004.
- 1.2 This Non-Technical Summary summarises the findings of the Sustainability Appraisal (Susta) of the Site Allocations Development Plan Document – Proposed Submission Version (SADPD PSV). It forms part of the Susta Report for the SADPD PSV, which has been produced alongside the SADPD PSV to provide guidance on its development. This report presents the key findings to date of the Susta on the SADPD PSV and provides background and relevant additional information.

2. The Site Allocations Development Plan Document

- 2.1 Once adopted, the SADPD will be part of the statutory development plan for Lambeth, alongside the [Lambeth Local Plan 2021](#), the [London Plan 2021](#) and [South Bank and Waterloo Neighbourhood Plan 2019](#). It will therefore form part of the suite of planning policy documents that help deliver sustainable growth and investment in Lambeth. It will support implementation of wider Council strategies including the [Borough Plan](#), [Economic Resilience Strategy](#), [Transport Strategy](#) and emerging Climate Action Plan.
- 2.2 The SADPD will add site-specific policies to those already in the Lambeth Local Plan (LLP) 2021. The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy.
- 2.3 The SADPD should be read, and policies will be applied, alongside and in conjunction with the rest of the development plan for Lambeth, namely the London Plan, the LLP and made neighbourhood plan.
- 2.4 The SADPD PSV includes policies for thirteen sites, distributed across the borough as shown on Map 1 (next page). Of these sites, three have existing allocations in the Lambeth Local Plan 2021: Royal Street (Site 1); Gabriel's/Princes Wharf (Site 9) and Norwood Road (Site 18). These existing allocations will be superseded on adoption

of the SADPD. The other existing allocations within the Local Plan 2021 are unaffected by the SADPD and will remain as they are in the Local Plan.

Map 1: Location of Site Allocations in the SADPD PSV



3. The Sustainability Appraisal

3.1 The purpose of the SustA is to inform the decision-making process, by highlighting the potential implications of pursuing a particular strategy or policy response. It aims to ensure the adopted Development Plan Document (DPD) takes a sustainable planning approach to development in the borough.

3.2 SustA must follow Government guidance on SustA and meet the requirements of the European Strategic Environmental Assessment Directive. A summary of the method used to undertake the SustA on the SADPD PSV is set out below in Table I.

Equality Impact Assessment

3.3 It is important that the SustA adequately addresses equality and diversity issues. The Council has an adopted approach to undertaking Equality Impact Assessments (EqIA) and this SustA seeks to integrate the principles of the EqIA across the sustainability objectives. This helps to explore the impact of the proposed policy on different equalities groups, (ie. ethnicity, gender, gender re-assignment, disability, age, sexual orientation, religion or belief, socio-economic factors, marriage and civil partnership, pregnancy and maternity, language, health).

Health Impact Assessment

3.4 As with the EqIA, the Health and Well-being Impact Assessment is integrated into the SustA; an approach previously used in the preparation of Lambeth DPDs (most recently LLP 2021), which was also discussed and agreed with NHS Lambeth at the time.

3.5 A Health Impact Assessment screening has been carried out through the inclusion of SustA Objective 2 *Health and wellbeing* and other related objectives that impact on health. Any adverse impacts identified through this screening would then be assessed through a separate full Health Impact Assessment.

Table I: SustA process thus far

Date	Actions
SA Stage A: Setting the context and objectives, establishing the baseline and deciding on scope	
July 2020	The draft Scoping Report was made available for comment to the three statutory bodies Natural England, Environment Agency and Historic England over an eight-week period from early July. The draft Scoping Report provided a summary of the current environmental, social and economic conditions in Lambeth. The baseline information of the Scoping Report assisted in the development of the SustA Framework (objectives to be used to appraise the SADPD). Consultation responses were received from all three statutory bodies and their comments have been incorporated in the final Scoping Report.
Stage B: Developing and refining alternatives and assessing their effects; and Stage C: Preparing the Sustainability Appraisal Report	
January 2022	A Draft SustA on the Draft SADPD including appraisal of reasonable alternatives. The Draft SADPD was made available for public consultation in accordance with Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) for a period of 6 weeks commencing 10 January 2022. The SustA Report was available as a supporting document to the Draft SADPD and was also available for public comment.
Summer 2022 – Winter 2023	The SADPD PSV was drafted, taking into account representations made at Regulation 18 and further evidence gathered during this period. The SustA has been updated to appraise the SADPD PSV.
Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public	
Early 2024	The SADPD PSV and SustA are made available for public consultation in accordance with Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) in early 2024.

4. Current environmental, social and economic conditions in Lambeth

- 4.1 The Scoping Report 2021 sets out a thorough account of the environmental, social and economic conditions in Lambeth. The baseline information has been reviewed as part of this SustA to ensure it reflects the current position in the borough. A brief summary is set out below.
- 4.2 The London Borough of Lambeth covers an area of about ten and a half square miles, and covers Waterloo and the South Bank, Vauxhall, the Oval, Kennington, Stockwell, Clapham, Brixton, Loughborough Junction, Herne Hill, Streatham, Tulse

Hill, West Norwood and Gypsy Hill. Lambeth is an inner London borough with the north of the borough having a mix of central London activities, while the south of the borough is predominately suburban in character. Lambeth is an area of contrasts. The northern part of the borough features internationally significant central London activities centred around Waterloo and the South Bank area, including the South Bank Centre, major corporate offices, the London Eye and Oval Cricket Ground. Heading south this area gives way to the diverse centres of Brixton and Clapham with their unique blend of entertainment, speciality retail and cultural industries, surrounded by a culturally-diverse residential population. Further south are the suburbs of Streatham and Norwood which also feature locally important town centres. With no strategic industrial locations in Lambeth, locally significant sites known as Key Industrial Business Areas (KIBAs) are protected and these are scattered throughout the borough.

- 4.3 The borough has an important historic environment with 62 Conservation Areas covering approximately 30 per cent of the borough including circa 2,500 listed buildings, the vast majority of which are nineteenth-century residential dwellings. There are also 17 Archaeological Priority Zones and eight historic Registered Parks and Gardens as well as protected strategic views in the north of the borough of St Pauls Cathedral and the Palace of Westminster which is a World Heritage site.
- 4.4 Lambeth is a very diverse borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is the among the most densely populated local authority in England, with over 100 people living in each hectare, more than twice the London population density. Nearly a third of a million people live in Lambeth – at least 318,000. Lambeth has a relatively young age profile. Although it is a largely residential borough, it is a destination for young working age people, rather than families. It has a complex social and ethnic mix, with large African and Portuguese populations, and is an important focus for the UK black Caribbean population. The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity.
- 4.5 The proposed site allocations affect the following wards: Waterloo & South Bank, Kennington, Brixton North, Brixton Acre Lane, Brixton Rush Common, Streatham Hill East and Knight's Hill. Wards such as Brixton North, Kennington and Waterloo and South Bank are also some of the most deprived parts of Lambeth, which is one of the most deprived areas of the country according to the Index of Multiple

Deprivation.

- 4.6 Lambeth is an important part of the London economy, which has experienced growth more strongly than the rest of the UK as a whole. The north of Lambeth is an integral part of London's Central Activities Zone (CAZ), home to significant employers and cultural and tourism assets. Further south are a series of important town centres including Brixton, Clapham, Streatham and West Norwood/Tulse Hill. As well as being an important employment location, Lambeth makes a crucial contribution to London's economy as a place where young, highly skilled people live – over 45 per cent of residents are educated to degree level which is comparable with many inner London boroughs (SOB report 2016).

5. What would happen without the Site Allocations Development Plan Document

- 5.1 The SustA is required to look at what the effect on the current conditions would be if there was no SADPD. In this instance, development would continue to come forward and be assessed against the current DPD for Lambeth, however for the 13 sites included in the SADPD PSV there would be a risk that these sites may not achieve their full potential without a site-specific planning policy.
- 5.2 Sites are included in the SADPD PSV for one or more of the following reasons:
- to set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver;
 - to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies;
 - to articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships;
 - to encourage landowners to consider the potential for optimising the development capacity of their land and help deliver key place-making objectives;
 - to signal some additional sites as appropriate for tall buildings, outside the locations already identified in the Local Plan;
 - to enable key strategic infrastructure to come forward in a timely way.

6. Key sustainability issues

6.1 The diverse character of Lambeth has resulted in a number of complex sustainability issues (see Table II below).

Table II: Summary of key sustainability issues in Lambeth

Lambeth key issue	Considerations
Increase the overall supply and mix of housing , including affordable housing.	Improve access to good quality housing. Amount of affordable housing. Sustainable housing. Housing mix and types. Addressing overcrowding.
Protect and enhance heritage assets , their settings and the wider historic environment as part of reinforcing local distinctiveness and place-making.	Built heritage. Archaeology and Archaeological Priority Areas Heritage at risk Designated and non-designated heritage assets including Westminster World Heritage Site Townscape and Landscape. Urban design.
Provide the essential infrastructure to support population growth.	Infrastructure provision, including healthcare services, transport, digital connectivity and facilities; and schools.
Develop mixed, cohesive, safe communities accessible to all.	Create mixed and cohesive communities. Safer communities. Accessible environments. Meeting the needs of diverse communities. Addressing social inequities. Addressing causes of Multiple Deprivation. Addressing high rates of child poverty. Tackling crime. Tackling terrorism. Addressing fear of crime.
Provide good access to local services and community facilities within neighbourhoods. Increase public transport accessibility and promote walking and cycling.	Good local access to services, green infrastructure and facilities. Tackling congestion and overcrowding on services and roads. Increase use of public transport, cycling and walking.
Increase the number and variety of jobs in the local economy , including local jobs for local people.	Increasing jobs, particularly local jobs for local people. Addressing worklessness and unemployment among Black, Asian, Ethnic and Minority groups.

Lambeth key issue	Considerations
	<p>Tackling barriers to employment.</p> <p>Post covid-19 recovery and job retention.</p> <p>Lambeth's role in London and UK economy.</p>
<p>Support the growth of key economic sectors through new business development, business retention and inward investment.</p>	<p>New business development.</p> <p>Business retention.</p> <p>Inward investment.</p> <p>Targeting key economic sectors.</p> <p>Addressing loss of employment land.</p> <p>Affordability of business space.</p> <p>Economic recovery post covid-19</p>
<p>Create viable, safe and well managed town centres.</p>	<p>Create viable, safe and well managed town centres.</p> <p>Mixed use development.</p> <p>Protection of cultural and leisure services and facilities.</p>
<p>Support the regeneration and renewal of Opportunity Areas.</p>	
<p>Reduce carbon emissions from residents, businesses, public services and buildings.</p> <p>Implement measures to help Lambeth adapt to the consequences of inevitable climate change, including flood risk management</p>	<p>Reducing CO₂ emissions.</p> <p>Promote a low carbon economy.</p> <p>Provision of climate change adaptation, including flood risk management, drought and heat risk and associated impacts.</p>
<p>Maximise the efficient use and management of resources, including water, energy and waste.</p>	<p>Efficient use and management of energy use and supply. Reducing fuel poverty.</p> <p>Efficient use and management of water: addressing increasing demand and improve the quality of water.</p> <p>Efficient management of waste: increasing recycling rates and self-sufficiency in waste disposal. Waste arisings in construction materials.</p>
<p>Health and well-being</p>	<p>Improving air quality (and meeting EU targets).</p> <p>Addressing health inequalities and the health needs of Lambeth's existing and new residents.</p>
<p>Biodiversity, green infrastructure and open space</p>	<p>Improving and enhancing biodiversity, habitats and green spaces.</p> <p>Increasing amount of green infrastructure.</p>

7. Sustainability Appraisal Framework

7.1 The SustA Framework is a way of considering the effects of a DPD It is a list of social, economic and environmental objectives that the Plan is tested against. The framework used is shown in Table III below, which also shows how each objective meets SEA (Strategic Environment Assessment) topic requirements.

7.2 The SustA Framework was developed in the Scoping Report 2021 and has since been updated in response to consultation comments received. The updated SustA Framework is presented below

Table III: Revised Sustainability Objectives and SEA Topic Requirement

	SA Objective	SEA Topic Requirement
1	Crime and safety. Ensuring safe communities with reduced crime and disorder.	Population
2	Good health and well-being. Promote a healthy community, including reducing health inequalities and the causes of ill health.	Population, Human Health
3	Access and services. Create an environment that is accessible to and fully inclusive for all people including the elderly and disabled and improve accessibility to key services and facilities.	Population, Human Health
4	Provision of essential infrastructure. To ensure that the necessary infrastructure is planned or in place to meet current or likely future demands.	Population, Human Health, Material Assets
5	Equality and diversity. To tackle poverty and social exclusion and ensure equitable outcomes for all communities, particularly protected equality groups.	Population, Human Health
6	Housing. Ensuring everyone has the opportunity for an affordable decent home, quiet enjoyment of that home and the protection of local amenity.	Population, Human Health, Material Assets
7	Liveability and place. To design and sustain liveable, mixed-use physical and social environments that promotes long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	Population, Human Health, Material Assets, Landscape, Cultural Heritage
8	Built and historic environment. Improve the quality, attractiveness, character and sustainability of the built environment through high quality design and protection of open space, valued views and designated and non-designated historic assets.	Landscape, Cultural Heritage (including architectural and archaeological heritage)
9	Transport and travel. Integrate planning and transport decisions, to reduce the need to travel, reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and use of public transport.	Population
10	Biodiversity. To protect, enhance and promote existing habitats and biodiversity, and	Biodiversity, Flora,

	to bring nature closer to people where possible.	Fauna, Landscape, Soil, Water
11	Green infrastructure. To create, manage and enhance green infrastructure.	Biodiversity, Flora, Fauna, Landscape, Soil, Water
12	Climate change and energy. Minimise energy consumption and increase energy efficiency and the use of renewable energy. Reduce greenhouse gases and prepare for the unavoidable effects of climate change throughout the life of the development.	Climatic Factors, Materials Assets
13	Water resources and flood risk management. To protect and manage water resources (including groundwater) and to minimise floor risk.	Water, Climatic Factors
14	Waste. Ensure that Lambeth manages its waste in a sustainable manner, minimising the production of waste and increasing re-use, recycling, remanufacturing and recovery rates.	Population, Material Assets
15	Air quality. To improve air quality and limit exposure to poor air quality.	Air
16	Local economy. To encourage and accommodate sustainable and resilient economic growth, and employment opportunity.	Population, Material Assets
17	Regeneration and efficient use of land. To ensure new development makes efficient use of land through the re-use of previously developed land, existing buildings and infrastructure, taking into account constraints such as contaminated land.	Material Assets, Soil
18	Tackling worklessness. Increase the amount of and access to employment generating activities and offer all residents the opportunity for rewarding, well-located and satisfying employment.	Population, Material Assets

8. Sustainability Appraisal Findings

8.2 An appraisal has been carried out on the sustainability of the SADPD PSV policies. Table IV of the SustA provides a summary of the sustainability scores for the thirteen sites.

8.3 Overall, the appraisal has concluded that the proposed site allocation policies comprehensively address all components of sustainable placemaking and it is considered that all SustA objectives have been addressed positively in the site allocation policies, taking into account the context of the site and surrounding area. Where uncertainty has been identified, these generally relate to implementation of measures on environmental objectives and/or pressure on infrastructure. Provided LLP policies are considered and implemented early in the design process, then it is considered positive effects on the environment are possible through the proposed site allocation policies.

8.4 Following Reg 18 consultation, officers have considered all representations received, and have carried out further design work, such as daylight/sunlight assessments, as well as undertaking viability appraisals, to ensure the SADPD meets the requirements of the national planning policy framework (NPPF). This work has been informed by collaboration with neighbouring authorities and statutory consultees, with officers working under the Duty to Cooperate. This process has led to further refinements of the SADPD.

SustA Recommendations

8.5 The SustA objectives have been used as a framework to consider all changes made to the SADPD to help ensure positive environmental outcomes are achieved and identify where mitigation will be required. Changes incorporated into the SADPD PSV include specific reference to Local Plan policy S2 (new or improved social infrastructure). Comments from the GLA, Environment Agency, and other parties made at Reg 18 have led to further detailed requirements on matters including biodiversity, flood risk, and surface water, as well as heritage, transport, and inclusive environments being incorporated into the revised policy text of the SADPD.

8.6 The SustA has scored the sustainability effects of the SADPD PSV using the symbols shown in Table V. Table VI presents the likely effects of the SADPD PSV taking into account SustA recommendations.

Table IV: Key symbols used in the appraisal

Symbol	Meaning
++	Significant positive effect on sustainability objective (normally direct)
+	Minor positive effect on sustainability objective
0	Neutral effect on sustainability objective
-	Minor negative effect on sustainability objective
--	Significant negative effect on sustainability objective (normally direct)
/	Policy has more than one score e.g. +/- policy could both support and conflict with the Sustainability Appraisal objective in a minor way.
?	Uncertain effect on sustainability objective

Table V: Likely effects of site allocations policies on SustA Objectives

Sustainability Appraisal Objective	Site1	Site2	Site3	Site7	Site8	Site9	Site17	Site18	Site20	Site21	Site22	Site23	Site24
SustA 1: Crime	++	++	+/>++	+/>++	++	++	++	++	++	++	++	++	+/>++
SustA 2: Health	++	++	++	+/>++	++	++	++	++	++	++	++	++	++
SustA 3: Access	++	++	++	++/>?	++	++	++	++	++	++	++	++	++
SustA 4: Infrastructure	++/>?	+/>?	+/>?	+/>?	+/>?	+/>?	+/>?	+/>?	+/>?	+/>?	+/>?	+/>?	+
SustA 5: Equality	++	+/>++	++	+/>++	++	++	++	+ / ++	+/>++	+/>++	++	++	++
SustA 6: Housing	+/>++	0	++	++	++	++	++	++	++	++	++	++	0
SustA 7: Liveability	++	+/>++	++	++	++	++	++	++	+/>++	+/>++	++	++	++
SustA 8: Built Environ	+/>++	+/>++	++	+/>++	+/>++	+/>++	+/>++	+/>++	+/>++	++	++	++	+/>++
SustA 9: Transport	++	+/>++	++	+/>++	+/>++	++	+/>++	++	++/>?	++	++	++	++
SustA 10: Biodiversity	+	+	+	+	+	+	+	+	+	+	+	+	0/+
SustA 11: Green Infrastruct	+	+	+	+	+	+	+/>++	+/>++	+/>++	+/>++	+	+	+
SustA 12: Energy	+/>++	+/>++	+	+/>++	+/>++	+/>++	+/>++	+/>++	+/>++	+/>++	+/>++	+/>++	+/>++
SustA 13: Water/Flood risk	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	+/>?
SustA 14: Waste	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	++
SustA 15: Air quality	0/+	+	+	0/+	0/+	+	+	+	+	+	0/+	0/+	0/+
SustA 16: Economy	++	+/>++	+/>++	+/>++	++	++	+/>++	++	++	++	+/>++	+/>++	++
SustA 17: Efficient land	++	+/>++	++	++	++	++	+/>++	++	++	+/>++	+/>++	++	+/>++
SustA 18: Employment	++	+/>++	+/>++	+/>++	++	++	+/>++	++	++	++	+/>++	++	++

Consideration of Reasonable Alternatives to policy approach

8.7 Reasonable alternatives (RA) have been considered in the development of the SADPD PSV. Identification of the reasonable alternatives for each site involved consideration of the existing land uses on site and the London Plan and LLP policies that would apply to the site given its location and existing landuses. Consideration of these existing land use parameters affecting the site helped inform both the reasonable alternatives for the site and the proposed site allocation land uses.

8.8 In response to alternative sites received during the preparation of the SADPD, the Council maintain sites have been included in the SADPD where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. The SADPD confirms there is no need for Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target or other development needs, as this was achieved through the recent examination of the LLP 2021. It is not necessary to have a site-specific allocation for every potential development site in the borough. It is considered that most sites could come forward successfully without requiring a site-specific policy, with sustainable development achieved through application of the development plan as a whole.

9. Designated sites, including European Nature Conservation sites

9.1 The Council has considered whether the SADPD PSV is likely to have an effect on European wildlife sites, as required under European legislation. No European Sites lie wholly or partly within Lambeth Borough. Four European Sites (Richmond Park, Walthamstow Reservoirs, Wimbledon Common and Epping Forest) lie partially within 15 kilometres of the Lambeth Borough boundary. A screening assessment has been prepared on the SADPD PSV. This has concluded that the SADPD PSV would not have an adverse impact on the integrity of the four sites and therefore the Appropriate Assessment stage of Habitats Regulation Assessment (HRA) is not required. This screening assessment is available for public comment alongside the SustA and SADPD PSV.

10. Limitations of the SustA process

10.1 The SustA process is a useful way to identify potential issues and make suggestions to reduce possible negative impacts. It tests how policies work against sustainability objectives. However, there are a number of uncertainties and limitations that exist in the SustA process, which are summarised below:

- The principal source of difficulty undertaking the SustA is the reliance on the judgement of predicting and assessing effects. However, the SustA has been undertaken by professionals in town planning and sustainability issues. Consultation on the SustA report has added value to the process through the views of other 'experts' and interested stakeholders who have reviewed the effects identified and provided alternative opinions for further consideration.
- Potential complexities in respect of predicting the impact of the SADPD in the long term (for example uncertainties under the current difficult economic climate, aftermath of COVID-19, funding gaps for some infrastructure projects and post Brexit arrangements).
- Complexities associated with and distinguishing between and separating out the influence of the SADPD, and other DPDs from other external factors. For example, whilst specific local conditions such as air quality, carbon emissions or health could be getting worse, this could be due to various factors beyond the control of the DPD, and the SADPD (and other DPDs) itself may still have a positive influence in so far as planning can influence such areas.
- A further difficulty was deciding how significant the effects of the SADPD would be. This is particularly true for sustainability objectives such as health which are influenced by a wide range of factors.

11. Conclusion

1.1 The SADPD PSV includes site allocation policies for thirteen sites, distributed across the borough. The SADPD has been produced with the premise of sustainable patterns of urban development.

1.2 The SustA report provides an appraisal of the reasonable alternatives for the proposed thirteen site allocations, and an appraisal of the site allocation policies set

out in the SADPD PSV. The SustA framework incorporates the requirements of the European Strategic Environmental Assessment Directive, and also integrates an EqIA, and HIA screening. The SustA is also accompanied by a Habitats Regulation Assessment.

- 1.3 The SustA concludes that the site allocation policies comprehensively address all components of sustainable placemaking and it is considered that all SustA objectives have been addressed positively in the proposed site allocation policies, taking into account the context of the site and surrounding area. Provided LLP policies are considered and implemented early in the design process, it is considered positive effects on the environment are possible through the proposed site allocation policies. Where appropriate, SustA recommendations have been made to improve proposed site allocation policies.

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