

Wiltshire Core Strategy

Sustainability Appraisal (incorporating Strategic Environmental Assessment)

Adoption Statement

January 2015

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1. Introduction

- 1.1 The Wiltshire Core Strategy was adopted on xx January 2015. Further details of the adoption process and supporting documents can be found on the Wiltshire Council website at www.wiltshire.gov.uk.....
- 1.2 The Core Strategy is accompanied by a Sustainability Appraisal Report (SA Report) which incorporates requirements for a Strategic Environmental Assessment (SEA). This combined assessment assesses the social, economic and environmental effects of implementing the Core Strategy, and reasonable alternatives, with the purpose of promoting the objectives of sustainable development and ensuring their integration within the Core Strategy. Wiltshire Council, as the body which prepares and adopts the Core Strategy, is classified as the 'Responsible Authority' under the SEA Regulations and Wiltshire Council prepared the SA.
- 1.3 SA is required by the Planning and Compulsory Purchase Act 2004 which requires consideration of sustainability effects for all emerging Development Plan Documents. European Directive 2001/42/EC (often known as the SEA Directive) requires the preparation of an environmental report that considers the significant environmental effects of a plan or programme. This Directive is transposed into UK law by *The Environmental Assessment of Plans and Programmes Regulations 2004: Statutory Instrument 2004 No. 1633* (The SEA Regulations).
- 1.4 The SEA Regulations (Reg 16) specify that *'as soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall...bring to the attention of the public...a statement containing the following particulars...*
 - a) *how environmental considerations have been integrated into the plan or programme;*
 - b) *how the environmental report has been taken into account;*
 - c) *how opinions expressed in response to—*
 - (i) the invitation referred to in regulation 13(2)(d);*
 - (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;*
 - d) *how the results of any consultations entered into under regulation 14(4) have been taken into account;*
 - e) *the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and*
 - f) *the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*
- 1.5 This information is presented in the following sections.

2. How have sustainability, and in particular, environmental considerations been integrated into the Core Strategy?

2.1 An integral part of preparing the Core Strategy has involved the iterative process of Sustainability Appraisal (SA). This process incorporated Strategic Environmental Assessment (SEA) and involved the following key stages:

a) preparing an SA Report on the likely significant effects of various iterations of the draft Core Strategy;

b) carrying out consultation on the SA Report;

c) taking into account the SA Report and the results of consultation in decision making; and

d) providing information when the Core Strategy is adopted and showing how the results of the environmental assessment have been taken into account.

2.2 The SA commenced at a very early stage in the preparation of the Core Strategy. SA is most effective when started as early as possible, ideally at the same time as the preparation of the plan or programme. The SA of the Wiltshire Core Strategy built on SA work previously completed by the former Wiltshire district authorities, prior to April 2009; further information on this can be obtained from <http://www.wiltshire.gov.uk/ldfsustainabilityappraisal.htm>

SA Scoping Report

2.3 Following on from that initial work, Wiltshire Council prepared an SA Scoping Report for the Core Strategy. This Scoping Report culminated in a framework of sustainability objectives which were subsequently used to assess the effects of the Core Strategy and ensure sustainability, and environmental, considerations were embodied throughout the Core Strategy. Reg 12 of the SEA Regulations requires decisions to be made on the '*scope and level of detail of the information*' to be included in the SA Report. The consultation bodies - Natural England, Environment Agency and English Heritage - are required to be consulted on this scoping work.

2.4 Consultation on the Draft SA Scoping Report was undertaken from 12th January 2009 to 16th February 2009, involving not only the three consultation bodies but also a wide range of other stakeholders. A revised version of the Scoping Report was published in April 2010 which takes account of all comments received through the public consultation exercise. In February 2012, the Council also produced an addendum to the Scoping Report to provide an updated evidence base for the SA process being undertaken on the Wiltshire Core Strategy.

2.5 Further details of all scoping documents produced, including details of consultation undertaken, can be viewed at <http://www.wiltshire.gov.uk/ldfsustainabilityappraisal.htm> This includes an SA Scoping Report Statement of Community Engagement which summarises all responses received and how the Council responded to these.

SA Report

2.6 Various iterations of the SA Report were produced and consulted on, including assessments of modifications to the Core Strategy recommended before and after the examination in

public. Each of these documents outline the findings of the assessment of effects of reasonable alternatives, and include details of mitigation measures to reduce predicted adverse effects and measures to increase beneficial effects. Recommendations are made as to which reasonable alternatives are preferred in sustainability terms and how proposed policies could be improved.

2.7 Details of all iterations of the SA Report, and where these can be accessed, are provided below:

- Wiltshire 2026 SA Report (Wiltshire Council, October 2009) - available at: <http://www.wiltshire.gov.uk/wiltshire2026.htm>
- Wiltshire Core Strategy Interim SA Report (Wiltshire Council, June 2011) – available at: <http://www.wiltshire.gov.uk/wcsconsult2011.htm>
- Wiltshire Core Strategy Consultation SA Report (Wiltshire Council, January 2012) – available at: <http://www.wiltshire.gov.uk/wiltshirecorestrategypresubmissionconsultation.htm>
- Wiltshire Core Strategy Submission SA Report (Wiltshire Council, June 2012) – available at: <http://www.wiltshire.gov.uk/submissionofwiltshirecorestrategy.htm>
- Wiltshire Core Strategy SA Report Focussed Consultation Document (Wiltshire Council, September 2012) – available at: <http://www.wiltshire.gov.uk/corestrategydocuments.htm?directory=Examination%20Documents> (document refs EXAM/ 05 – EXAM/05E)
- Wiltshire Core Strategy SA Report Addendum (Wiltshire Council, August 2013) – available at: <http://www.wiltshire.gov.uk/corestrategydocuments.htm?directory=Examination%20Documents> (document ref EXAM/57)
- Wiltshire Core Strategy SA Report Addendum (Wiltshire Council, February 2014) – available at: <http://www.wiltshire.gov.uk/corestrategydocuments.htm?directory=Examination%20Documents> (document ref EXAM/88)
- Wiltshire Core Strategy SA Report Addendum (Wiltshire Council, April 2014) – available at: <http://www.wiltshire.gov.uk/corestrategydocuments.htm?directory=Examination%20Documents> (document ref EXAM/99)

2.8 The findings and recommendations outlined in the various SA Reports listed above were taken into account through the amending and finalising of Core Strategy objectives, policies and site selection. Sustainability and environmental considerations are reflected in the wide-ranging nature of Core Strategy policies, presented under the following objective headings:

Objective 1 - delivering a thriving economy

Objective 2 – addressing climate change

Objective 3 - providing everyone with access to a decent, affordable home

Objective 4 - helping to build resilient communities

Objective 5 - protecting and enhancing the natural, historic and built environment

Objective 6 - ensuring that essential infrastructure is in place to support our communities

2.9 Policies that aim to meet these objectives can be found in the Core Strategy through Core Policies 1 – 69, and should be referred to for further details. These policies can be cross-referenced against the 17 SA objectives outlined in the SA Framework in Appendix B of the SA Report. The assessment of Core Strategy policies and proposed strategic sites against the SA Framework can be found in Appendices H-J of the SA Report.

3. How has the Sustainability Appraisal been taken into account during the preparation of the Core Strategy?

3.1 Section 5 of the SA Report presents the assessment of Core Strategy objectives, proposed core policies and strategic sites, and reasonable alternatives to those. In each policy section within Section 5, there is a brief outline of the policy, followed by a table setting out the reasonable alternatives assessed. This is followed by a summary of the significant effects, possible mitigation measures and recommendations for the Core Strategy.

3.2 Table 6.1 in the SA Report presents the main recommendations of the SA and how the Core Strategy has taken account of these. For example, for Core Policy 9 – Chippenham Central Areas of Opportunity – the SA noted potential conflicts between the promotion of the river Avon corridor for leisure and recreation and enhancement of its role as a wildlife corridor and explained that significantly increased recreational disturbance could adversely affect wildlife habitats in this area. As a result, the policy was amended to require river corridor enhancement to be done in an environmentally sensitive manner ‘while conserving and enhancing its role as a wildlife corridor’.

3.3 Another example of the influence of the SA was the decision to increase the Core Strategy housing requirement of 37,000 dwellings over the plan period. The examination Inspector stated in his final report that *‘at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period’*. He noted that the Council had subjected its housing figures to SA and that Option 1 of the SA related to a range of 35,800 – 42,100 which performed better in sustainability terms than its Option 2 of 56,800 dwellings. The Inspector noted that the SA had concluded that *‘by providing housing at the higher end of the range [42,100 dwellings] there will be opportunities to mitigate some of the impacts highlighted through strong policies promoting environmental protection within the Core Strategy...’*. He states that *‘subsequent evidence does not indicate a change in circumstance which would lead to a minimum figure of 42,000 not being justified and reasonable’...and that ‘this is not contradicted by the Council’s revisions to the SA’*.

3.4 Themed topic papers produced by the Council as evidence for Core Strategy policies and site selection also contain a discussion of the outcomes of the SA assessment of relevant policies. Conclusions are provided with regards to options to be taken forward in the Core Strategy, based partly on the recommendations of the SA. These topic papers can be viewed at <http://www.wiltshire.gov.uk/planningpolicyevidencebase.htm> and consist of:

- Topic paper 1 – Climate Change
- Topic paper 2 - Housing
- Topic paper 3 – Settlement Strategy
- Topic paper 4 – Rural Signposting
- Topic paper 5 – Natural Environment
- Topic paper 6 - Retail
- Topic paper 7 - Economy

Topic paper 8 – Infrastructure and Developer Contributions
Topic paper 9 – Built and Historic Environment
Topic paper 10 - Transport
Topic paper 11 – Green Infrastructure
Topic paper 12 – Site Selection Process
Topic paper 13 - Military
Topic paper 14 – Building Resilient Communities
Topic paper 15 – Housing Requirement Technical Paper
Topic paper 16 – Gypsies and Travellers

4. How have the results of any consultation entered into under Regulation 14(4) been taken into account?

4.1 Regulation 14(4) relates to where the Secretary of State receives a request from another EU Member State an indication that it wishes to enter into consultations before the adoption, or submission, of a plan or programme. No such request was received and therefore no additional consultation of this nature was undertaken.

5. How have opinions expressed in response to consultations on the Sustainability Appraisal Report with the Consultation Bodies and the public been taken into account?

5.1 An SA Report was published with each consultation version of the Core Strategy since 2009 and the Consultation Bodies and public were invited to comment on each version. In addition, there have been several SA addendums produced in response to Core Strategy modifications, both before and after the Examination in Public hearing sessions. These were also consulted on.

5.2 Due to the amount of consultation exercises that have taken place since 2009, there are a number of consultation reports detailing comments received on the SA, and how the Council responded to them. These are outlined below:

- Wiltshire 2026 Consultation Methodology and Output Report and Appendices (Wiltshire Council, August 2010) <http://www.wiltshire.gov.uk/wiltshire2026.htm>
- Wiltshire Core Strategy Consultation Statement Appendices and 'Responses to Question 22' (Wiltshire Council, January 2012) <http://www.wiltshire.gov.uk/wcsconsult2011.htm>
- Wiltshire Core Strategy Submission SA Report – Appendix G (Wiltshire Council, June 2012) <http://www.wiltshire.gov.uk/submissionofwiltshirecorestrategy.htm>
- Examination document EXAM/71 Schedule of Representations on the Proposed Modifications (Wiltshire Council, November 2013) <http://www.wiltshire.gov.uk/corestrategydocuments.htm?directory=Examination%20Documents>
- Examination document EXAM/103 Report on Consultation 14th April – 27th May 2014 (Wiltshire Council, June 2014)

<http://www.wiltshire.gov.uk/corestrategydocument?directory=Examination%20Documents&fileref=33>

5.3 Consultation with the Consultation Bodies and the public also took place on the SA Scoping Report from 12th January 2009 – 16th February 2009. The report into the consultation, including officers' response to comments, can be viewed at <http://www.wiltshire.gov.uk/ldfsustainabilityappraisal.htm>

6. What are the reasons for choosing the Core Strategy as adopted, in light of other reasonable alternatives considered?

6.1 The Council has, through the SA process, considered reasonable alternatives to all Core Strategy policies and strategic housing and employment sites. The assessment of these, and reasons for choosing the approach outlined in the Core Strategy, are presented in Section 5 and Appendices H-J of the SA Report.

6.2 In addition to the reasons given in Section 5 and the appendices, Section 6 of the SA Report summarises the overall sustainability of the Core Strategy and the reasons for selecting the proposed approach. It concluded that significant effects, both positive and negative, are likely in a number of areas from the proposed approach but that it is possible to reduce or avoid many of the predicted adverse effects of implementation; the Core Strategy promotes development of brownfield sites and other strategic sites in sustainable locations and contains strong policies in many areas that will enable effective mitigation to take place.

6.3 Themed topic papers, as set out in Section 3 (above), also outline the reasons for selecting the preferred policy approach in light of other alternatives considered. Please refer to <http://www.wiltshire.gov.uk/planningpolicyevidencebase.htm> for further details.

6.4 In the Core Strategy examination Inspector's final report, he states that '*the submitted Core Strategy has been informed by an iterative process of SA*' and '*it is a matter of fact that the SA process has been undertaken with each consultation draft of the CS since 2009 with the intention of satisfying the SEA Directive and associated regulations. Such ongoing work incorporates the post submission CS changes proposed by the Council*'. He continues that '*as part of the SA process consideration has been given to reasonable alternatives to the submitted content of the CS and its policies. The Council considers that the SA adequately summarises or repeats the reasons that were given for rejecting alternatives at the time when they were ruled out and that those reasons remain valid*'. He concludes that '*the evidence indicates that the Council has undertaken a proportionate and adequate degree of SA relevant to the Core Strategy and its content*'.

7. What measures are to be taken to monitor the significant effects of the implementation of the Core Strategy?

7.1 The SEA Directive requires the significant environmental effects of plans and programmes to be monitored, in order to identify at an early stage unforeseen adverse effects and to be able to take appropriate action where necessary. Monitoring of significant effects will also include social and economic effects that have been predicted through the SA.

7.2 The requirements of the SEA Directive focus on monitoring the effects of the plan. This equates to both the plan's significant effects and also unforeseen effects. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to the implementation of the Core Strategy when they occur. However, this provision

may be understood as covering effects which differ from those which were predicted, or unforeseen effects which are due to changes of circumstances.

7.3 Proposed significant sustainability effects monitoring indicators are presented in Appendix F of the SA Report. These have been drawn from the baseline information and key sustainability issues published within the SA Scoping Report and are identified to monitor potential significant adverse effects highlighted in the SA Report. These indicators aim to:

- concentrate on the key sustainability issues identified in the appraisal
- provide information to identify when problems, including unexpected ones, arise
- contribute to addressing deficiencies in data availability identified in this appraisal.

7.4 It is good practice for the monitoring of significant effects to be integrated with other monitoring. For this reason, Wiltshire Council will report on significant effects as part of its existing monitoring regime.

Wiltshire Monitoring Framework

7.5 The Wiltshire Monitoring Framework has been published alongside the Core Strategy, and will be used to check on the effectiveness of the Core Policies and whether they are delivering sustainable development. The Monitoring Framework will be used to ask whether the policy is working, whether it is delivering the underlying objectives of the policy, and what the significant effects of this are. It sets out objectives and targets for each policy, and identifies the indicators which will be used to assess progress against these. The Wiltshire Monitoring Framework will ensure that the Core Strategy is steered by a continuous process of 'plan, monitor, manage'.

Annual Monitoring Report

7.6 An annual report will be prepared to analyse the impacts of the Core Policies, and assess progress against the targets identified in the Wiltshire Monitoring Framework. This Annual Monitoring Report (AMR) will include monitoring of the Core Policies and also information relating to the Infrastructure Delivery Plan (IDP) and the SA. Actions required to address policy performance against the strategic objectives will then be reconsidered.

7.7 The AMR will include the following:

- assessment of efficacy of policy using output, significant effect and contextual indicators
- consideration of significant and unforeseen effects, using indicators defined in the SA Report, providing a picture of how the sustainability criteria of the area are evolving
- consideration of infrastructure delivery, including analysis of Community Infrastructure Levy (CIL) and Section 106 receipts
- recommendations for policy review and mitigation of significant effects if required in response to the policy, SA and IDP analyses.