



Wiltshire Housing Site Allocations Plan

Sustainability Appraisal (incorporating
Strategic Environmental Assessment)

Adoption Statement

February 2020

Wiltshire Council

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1. Introduction

- 1.1 The Wiltshire Housing Site Allocations Plan (WHSAP) supports the delivery of new housing set out in the Wiltshire Core Strategy. It addresses two key matters i) revising settlement boundaries, where necessary and ii) allocating sites for new homes to help ensure delivery of homes across the plan period.
- 1.2 The WHSAP was adopted on 25th February 2020. Further details of the preparation, examination and adoption process, and all supporting documents, can be found on the Wiltshire Council website at <http://www.wiltshire.gov.uk/planning-whsap> and <http://www.wiltshire.gov.uk/planning-housing-sites-examination>
- 1.3 The WHSAP is accompanied by a Sustainability Appraisal (SA) Report which incorporates the requirements for Strategic Environmental Assessment (SEA). This combined assessment assesses the likely significant social, economic and environmental effects of implementing the WHSAP, and reasonable alternatives, with the purpose of promoting the objectives of sustainable development and ensuring their integration within the WHSAP.
- 1.4 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 likely 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. 1633¹ (The SEA Regulations). Wiltshire Council, as the body which prepares and adopts the WHSAP, is classified as the 'Responsible Authority' under these SEA Regulations.
- 1.5 The earlier stages of the SA process for the WHSAP were carried out independently by consultants Atkins Global Ltd for Wiltshire Council. Later stages of the SA process were carried out by Wiltshire Council but overseen by Atkins Global Ltd.
- 1.6 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*

¹ The Environmental Assessment of Plans and Programmes Regulations 2004

f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.'

1.7 This information is presented in the following sections.

2. How have sustainability, and in particular, environmental considerations been integrated into the Wiltshire Housing Site Allocations Plan?

2.1 An integral part of preparing the Wiltshire Housing Site Allocations Plan (WHSAP) has involved the iterative process of Sustainability Appraisal (SA). This process incorporates Strategic Environmental Assessment (SEA) and involves the following key stages: a) preparing a SA Report on the likely significant sustainability effects of the draft WHSAP; 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 WHSAP 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 WHSAP. 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 WHSAP built on SA work previously completed for the Wiltshire Core Strategy; further information on this can be obtained from <http://www.wiltshire.gov.uk/planning-policy-core-strategy>

Sustainability Appraisal Scoping Report

2.3 The Scoping Report was based on the SA of the Wiltshire Core Strategy. However, it was updated and refined, to be more specifically relevant to the aims of the WHSAP and the Chippenham Site Allocations Plan. This Scoping Report culminated in a framework of sustainability objectives which was subsequently used to assess the effects of the WHSAP and ensure sustainability, and environmental, considerations were embodied throughout the plan. 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 Historic England - are required to be consulted on this scoping work.

2.4 Consultation on the Draft SA Scoping Report was undertaken from 12th May 2014 to 16th June 2014, 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 August 2014 which takes account of the comments received through the public consultation exercise. The comments and responses are available to view in Appendix D of the Scoping Report².

Sustainability Appraisal Report

2.5 Various iterations of the SA Report were produced and consulted on alongside the WHSAP. The Final SA Report comprises a number of documents which cover the different stages of the plan making process, including assessments of modifications to the WHSAP, recommended before, during and after the examination in public.

² Wiltshire Housing Site Allocations DPD and Chippenham Site Allocations Plan SA/SEA Scoping Report (Atkins Ltd, August 2014)

Each of these documents outline the findings of the assessment of likely effects of the Plan, and reasonable alternatives, and include details of mitigation measures to reduce likely 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.

2.6 Details of all SA documents to support the adopted WHSAP are provided below. All SA documents can be accessed at: <http://www.wiltshire.gov.uk/planning-whsap>.

- SA Scoping Report (August 2014)
- SA Report Non-Technical Summary (February 2020)
- SA Report (February 2020)
- SA Report Annex I parts A1 to A12 – Site Options Assessment Tables (May 2018)
- SA Report Annex I part A3 Revised Chippenham CA (September 2018)
- SA Report Annex II – Assessment of Schedule of Proposed Changes (September 2018)
- SA Report Annex III – Assessment of Further Main Modifications (February 2020)
- SA Report Annex IV – Assessment of Consolidated Schedule of Main Modifications (February 2020)

2.8 Sustainability and environmental considerations have been integrated into the WHSAP throughout the process. The findings and recommendations outlined in the SA Report were considered through the amending and finalising of the WHSAP policies and site selection. Section 7 of the SA Report sets out conclusions and recommendations on the sustainability of various site options and Section 8 sets out conclusions and recommendations on the sustainability of the plan's policies.

2.9 The SA Report (Section 11) sets out mitigation measures (in the form of recommendations) that were identified as part of the assessment with recommendations on how to strengthen identified positive effects or minimise negative effects. The recommendations, together with the Council responses and any subsequent plan amendments are summarised in Table 11.1 of the SA Report.

3. How has the Sustainability Appraisal been taken into account during the preparation of the Wiltshire Housing Site Allocations Plan?

3.1 The SA process has been an integral part of developing the Wiltshire Housing Site Allocations Plan (WHSAP), with the aim of promoting sustainable development through the integration of social, environmental and economic considerations.

3.2 Refer to paragraph 2.9 above. Table 11.1 of the SA Report sets out all of the mitigation measures (in the form of recommendations) that were identified as part of the SA. All recommendations, together with the Council responses and any subsequent plan amendments, are summarised in that table.

3.3 The findings of the SA and how these influenced the final selection of housing site allocations is also explained in a number of Community Area Topic Papers which can be accessed via the WHSAP Online Document Library at

<https://cms.wiltshire.gov.uk/eccatdisplayclassic.aspx?sch=doc&cat=14020&path=14020>

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

4.1 A SA Report has been published alongside each consultation version of the Wiltshire Housing Site Allocations Plan (WHSAP) and the Consultation Bodies and public were invited to comment on each version. A record has been kept of all consultation responses that related to the SA and these informed subsequent amendments to future iterations of the SA. Details of consultations on the WHSAP and where further information is available is as follows:

- **Formal public consultation March to May 2014**
https://wiltshire.objective.co.uk/portal/spatial_planning/sites_dpd/wilts_housing_sites_dpd_reg_18
- **Informal consultation July to September 2014**
https://wiltshire.objective.co.uk/portal/spatial_planning/sites_dpd/settlement_boundary_review_initial_and_informal_consultation?tab=info
- **Informal consultation February to March 2015 and June to August 2015**
https://wiltshire.objective.co.uk/portal/spatial_planning/sites_dpd/informal_consultation_on_initial_site_options
- **Pre submission consultation July to September 2017**
<http://www.wiltshire.gov.uk/planning-whsap>
- **Focused Consultation on the Schedule of Proposed Changes and Associated Evidence Documents**
<http://www.wiltshire.gov.uk/spp-whsap-pccon-dec2018-sopc.pdf>
<https://cms.wiltshire.gov.uk/documents/s155085/EXAM08AppendixJScheduleofduallymadeSoPCreps.pdf>
- **Further Main Modifications Consultation**
https://wiltshire.objective.co.uk/portal/spatial_planning/sites_dpd/FMMs/whsapFMMs

4.2 There are a number of consultation reports detailing comments received both on WHSAP and on the SA, and how the Council responded to them. These are outlined below:

Report ref	Report title	Report date
PSCON/14A	Consultation Statement - Statement of Early Community Involvement	June 2017
PSCON/14B	Consultation Statement Reg 18 Consultation Report 24 March-5 May 2014	June 2017
PSCON/14C	Consultation Statement Report on the Informal Consultation on SBR 2014	June 2017
PSCON/14D	Consultation Report - Informal Cons in Site Assessment Methodology 2015	June 2017

PSCON/14E	Consultation Report - Approach to Large Villages 30 Jun-12 Aug 2015	June 2017
WHSAP/09	Consultation Statement Regulation 22 (1) (c) Submission version	July 2018
WHSAP/10	Consultation Statement Regulation 22 (1) (c) Appendices A-L - Submission version	July 2018
WHSAP/11	Consultation Statement Regulation 22 (1) (c) Appendices M-P - Submission version	July 2018
WHSAP/12	Consultation Statement Regulation 22 (1) (c) Appendix Q - Schedule of Repts - Submission version	July 2018
WHSAP/31	Report on consultation with Wiltshire Councillors and town and parish councils on the proposed changes to the Wiltshire Housing Site Allocations Plan 15th May -11th June 2018	July 2018
EXAM/08	Report on Focussed Consultation	Dec 2018
EXAM/10	Addendum to WC Report on Focussed Consultation	Jan 2019
EXAM/33	WHSAP Schedule of Further Main Modifications - September 2019 Consultation	Sep 2019

- 4.4 Consultation with the Consultation Bodies and the public also took place on the SA Scoping Report³ from 12th May 2014 to 16th June 2014. Comments were received from Natural England and the Environment Agency. English Heritage did not reply.
- 4.5 Consultation comments from Natural England focused on the SA framework by which the assessment should be undertaken, with recommendations for improvements to ensure that landscape and biodiversity effects are considered. Natural England also commented on the monitoring indicators so that they allow for the monitoring of the effects of the plan on the objective concerned, and not the objective more generally.
- 4.6 The Environment Agency noted that it was satisfied with the plans and programmes, sustainability objectives and baseline data. The Environment Agency wished to continue to be involved in the SA/SEA process and with the development of the DPDs. The consultation responses, officers' response to comments and suggested actions which were then agreed by the Council are available in Appendix D of the Scoping Report.
- 5. How have the results of any consultation entered into under Regulation 14(4) been taken into account?**
- 5.1 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.
- 6. What are the reasons for choosing the Wiltshire Housing Site Allocations Plan, as adopted, in light of other reasonable alternatives considered?**
- 6.1 The Council has, through the SA process, considered reasonable alternatives to the policies and site allocations contained within the WHSAP. The assessment of these, and reasons for choosing the approach outlined in the WHSAP, are presented in the SA Report (sections 2, 7, 8 and 13) and in a number of Community Area Topic Papers which can be accessed via the WHSAP Online Document Library at

³ Wiltshire Housing Site Allocations DPD and Chippenham Site Allocations Plan SA/SEA Scoping Report (Wiltshire Council, August 2014)

7. What measures are to be taken to monitor the significant effects of the implementation of the Wiltshire Housing Site Allocations Plan?

- 7.1 The SEA Directive states that *'member states shall monitor the significant environmental effects of the implementation of plans and programmes.....in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action'* (Article 10.1). In addition, the Environmental Report should provide information on a *'description of the measures envisaged concerning monitoring'* (Annex I (i)) (Stage E).
- 7.2 SA monitoring will cover significant social and economic effects as well as significant environmental effects; and it involves measuring indicators which will enable the establishment of a causal link between the implementation of the plan and the likely significant sustainability effects (both beneficial or adverse) being monitored. This will allow the identification of any unforeseen adverse effects and enable appropriate remedial action to be taken.
- 7.3 Details on monitoring, including proposed monitoring indicators, are presented in Chapter 12 of the SA Report. Existing guidance recommends monitoring to be incorporated into Local Authority's existing monitoring arrangements. Under Section 35 of the Planning and Compulsory Purchase Act 2004, the Local Authority is required to prepare an Annual Monitoring Report (AMR) to assess the implementation of the Local Development Plan and the extent to which policies and proposals are being achieved and to identify any changes if a policy is not working or if the targets are not met.
- 7.4 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 monitoring framework proposed in this SA Report complements the Wiltshire Monitoring Framework.
- 7.5 In order to reach a final framework of indicators for the AMR for the WHSAP, the Council will consider the indicators proposed in the SA to identify those which can be most effectively used to monitor likely significant sustainability effects. This will need to be undertaken in dialogue with statutory consultees and other bodies, as in many cases the monitoring information may need to be provided by outside bodies. Table 12.1 of the SA Report proposes potential targets and indicators to monitor potential significant effects (direct as well as cumulative effects) against the SA objectives and form the basis of the monitoring programme.

This document was published by the Spatial Planning team, Wiltshire Council, Economic Development and Planning Services.

For further information please visit the following website:

<http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm>

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