

South Gloucestershire Council
South Gloucestershire Core Strategy
Sustainability Appraisal / Strategic Environmental Assessment Adoption
Statement (December 2013)

1. Introduction

1.1 South Gloucestershire Council adopted the South Gloucestershire Local Plan: Core Strategy on Wednesday 11th December 2013. This Adoption Statement has been prepared in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004, which requires that on adoption of a plan or programme, a statement which sets out the following is published:

- How the environmental considerations have been integrated into the plan or programme;
- How the Environmental Report has been taken into account;
- How opinions expressed during consultation have been taken into account;
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

1.2 As required by S.19 (5) of the Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008) the 'significant effects' of implementing the plan have been included in a Sustainability Appraisal (SA) report, which incorporates social and economic effects alongside the environmental effects required by SEA (referred to as the 'Environmental Report' in the Regulations). The SA process also incorporates the requirements of Strategic Environmental Assessment (SEA) in accordance with European Union Directive 2001/42/EC and removes the need to carry out a separate SEA.

1.3 As a result, a combined SA / SEA of the Core Strategy has been undertaken which satisfies the relevant regulations and legislation. Where the Council is required by the Environmental Assessment of Plans and Programmes Regulations 2004 to produce a statement on 'environmental effects', it has expanded on this in relation to each of the 'particulars' listed above to include economic and social considerations / effects as well.

2. Background

2.1 The Core Strategy sets out a vision, strategic objectives, spatial strategy and supporting policies to guide development across South Gloucestershire up to 2027. The document includes the requirement for and delivery strategy of a minimum of 28,355 new homes to be constructed between 2006-2027. The Core Strategy includes new strategic land allocations amounting to 11,500 homes, the safeguarding of existing employment sites, the allocation of additional employment land and the need to allocate 34,000 sqm of retail comparison floorspace in a future plan.

2.2 The Council's Core Strategy and SA Report were submitted to the Secretary of State for Communities and Local Government in March 2011. The submission documents were supported by a Habitats Regulation Assessment, which concluded that there would be no likely significant effects.

2.3 The SA process has been undertaken as an iterative process alongside the development of the Core Strategy. Prior to the submission of the Core Strategy, consultation provided the public and statutory bodies (including the Environment Agency, Natural England and English Heritage) with an opportunity to comment on the Core Strategy and associated SA during its relevant preparation stages prior to submission. These consultations were undertaken in accordance with the Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008), the Town and Country Planning Regulations and the Environmental Assessment of Plans and Programmes Regulations 2004.

2.4 Paul Crysell, BSc, MSc, MRTPI was appointed as the Inspector to conduct an independent examination into the soundness of the submission version of the Core Strategy (March 2011) and its supporting documents. Before progressing to the hearing sessions of the Examination, the Inspector raised some concerns regarding the housing numbers proposed in the submitted plan, the approach the council had taken to Green Belt assessment and the proposed policy response to the announcement of the planned closure of Filton Airfield. As a result the council undertook further work and proposed changes to the submitted plan for the Inspector's consideration. This version of the Core Strategy was entitled the Post Submission version (December 2011), for which further SA work was conducted. The Post Submission version (December 2011) document and the associated SAs were subject to consultation in January to February 2012. In response to that consultation, Natural England confirmed that in respect of the Habitats Regulation Assessment, they did not consider that the suggested changes proposed in the Post Submission version of the Core Strategy, would be likely to result in a significant effect on the Natura 2000 network as defined under the provisions of the Conservation of Habitats and Species Regulations 2010.

2.5 The Inspector conducted a Pre-hearing Meeting (PHM) in April 2012 and the Examination in Public took place in June and July 2012 with an additional hearing day in March 2013. Following these hearing sessions the Inspector proposed a number of 'Main Modifications' in October 2012 and further Main Modifications in March 2013. Further SA Reports were produced following the receipt of the Inspector's Main Modifications. The Main Modifications and the revised SA's were published for consultation in October 2012 and March 2013 respectively.

2.6 The Council received the Inspector's Report in November 2013. In addition to the Main Modifications the Inspector confirmed that the Council would need to make "Additional Modifications" to the Core Strategy. These adjustments are necessary for the purpose of ensuring the Core Strategy reflects and is consistent with the Main Modifications. The Additional Modifications do not materially affect the policies to be adopted or the

respective sustainability appraisals which had been undertaken. Therefore no further SA was required following receipt of the Inspector's Report.

3. How environmental considerations have been integrated into the Core Strategy

3.1 The SA has been carried out as an iterative process alongside a number of key stages in the preparation of the Core Strategy (see section 2.3-2.5 above). The SA sought to test the impacts of emerging policy decisions and alternative strategy (individually and when taken together with the other policies) of the emerging Core Strategy against the agreed sustainability framework.

3.2 The SA was undertaken in parallel with development of the plan, so that all reasonable alternatives for achieving the plan's objectives were assessed for their sustainability effects, and to ensure that the wording of policies, as far as possible, sought to minimise any negative sustainability impacts and maximise any opportunities to deliver the sustainability objectives. Stakeholders including all statutory consultees were given opportunities to comment at each stage of plan production. The views expressed at each consultation stage were used to guide and inform the appraisal and plan preparation process. The development of the Core Strategy and the accompanying SA has therefore been an iterative, inclusive, and comprehensive process.

3.3 The SA framework was used to develop emerging policies and help identify the most appropriate policies and strategic sites to be included in the final version of the plan. In particular, the SA work that was undertaken alongside the site assessments for reasonable alternatives, has been integral to ensuring the allocations were both in the most sustainable locations and that the supporting policies for the site shape development in a sustainable manner.

4. How the SA/Environmental Report has been taken into account

4.1 The SA process, as set out in the 'SA/Environmental Report', which is made up of a suite of documents, has contributed to the development and refinement of the Core Strategy by providing a separate assessment of the sustainability of the Council's proposed options and policies throughout the plan preparation process. Each SA Report demonstrates how the sustainability of proposed alternative options has been considered in a consistent manner. All reports requiring decisions of Council relating to the Core Strategy have been accompanied by the relevant SA Report

4.2 This process has supported:

- The selection of the most appropriate options at each stage in an open and transparent way;
- The revision of options where necessary, to ensure that consideration is given to reasonable alternatives; and
- The establishment of mitigation measures to address certain potentially negative effects and achieve the most sustainable outcome.

5. How consultation responses have been taken into account

5.1 The minimum requirements for consultation and public participation are set out in the relevant Regulations. For the majority of the Core Strategy preparation process, these were the Town and Country Planning (Local Development) (England) Regulations 2004, (as amended) and the Environmental Assessment of Plans and Programmes Regulations 2004. Local Planning Authorities are also required to produce a Statement of Community Involvement (SCI) in order to set out how and when the community and other interested parties can take part in, and influence, the plan-making process.

5.2 The Sustainability Appraisals have been subject to the same level of the advertisement and consultation as the Core Strategy. At all stages consultation has included the Environment Agency, Natural England and English Heritage, their representations have helped inform subsequent iterations of the SA (and Core Strategy). No objection was received as to how the SA had been undertaken from these statutory consultees.

5.3 South Gloucestershire Council was also required under the Town and Country Planning Regulations to submit statements setting out, if representations were made in accordance with the regulations, the number of representations made and a summary of the main issues raised in those representations. These were produced as part of the process for preparing the Plan for Submission and a further addendum in April 2012 respectively, in accordance with Regulations 30(1)(d) and 30(1)(e) as they applied at the time.

5.4 Responses have helped to ensure that the full range of alternative options have been considered through the development of the Core Strategy and the accompanying SA process. The consultation responses have in particular helped to shape the detail of the policies to ensure the most sustainable outcomes.

5.5 By engaging in the process of considering alternatives, respondents to the consultation have helped to ensure that amendments to the original proposals have been made that should lead to a more sustainable outcome.

5.6 In conclusion the Council has satisfied the regulations in terms of consultation on its Core Strategy and associated Sustainability Appraisals.

6. Reasons for choosing the final version of the Core Strategy (in light of other reasonable alternatives)

6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 (12) (2) requires environmental reports (SA / SEA) to consider any reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.

6.2 As set out previously, the SA and plan making process for the Core Strategy have run effectively in parallel through all stages of the Core Strategy, with the relevant SA report being available when the Council has taken any decisions regarding the future of the Strategy. As well as helping to shape policies to ensure they are sustainable, the SA work has been key to justifying major decisions that underpin the Core Strategy. The table below lists the documents produced during the production of the Core Strategy:

Document	Examination Library Ref:
Local Development Framework Scoping Report 2008	SD15
Initial SA Report 2008 – to accompany the Core Strategy Issues & Options document & Appendices	SD17 & SD18
Draft SA Report of the Pre-Submission Publication Draft Core Strategy March 2010 & Appendices	SD6/1 & SD7/1
SA Report to support the Submission Core Strategy, March 2010 with December 2010 updates & Appendices	SD6 & SD7
Supplementary Sustainability Appraisal Report regarding Filton Airfield June 2011	SG4/1
December 2011 SA Report to Support the December 2011 Core Strategy incorporating Post-Submission Changes	PS3
October 2012 Sustainability Appraisal Report regarding the Inspector's Preliminary Findings and Main Modifications	MOD2
March 2013 Sustainability Appraisal Report regarding the Inspector's Further Main Modifications	MOD7

6.3 These documents are available on the Council's website at www.southglos.gov.uk/corestrategy and they demonstrate how the Core Strategy has been informed by SA objectives throughout its production.

6.4 Following the request from the Inspector as set out at paragraph 2.4, the impact of the closure of Filton Airfield et al was appraised in the SA that supported the December 2011 Core Strategy Post Submission Changes. In doing so and in accordance with the 2004 SEA Regulations, the December 2011 SA sets out the consideration of, and thereafter gives reasons for, the rejection of reasonable alternatives in relation to the material change in circumstances of uplifting the strategic housing requirement, testing alternative locations and the basis against which individual sites within these locations were selected and considered, taking into account all relevant material considerations. It also shows how the policies that are contained in the Core Strategy have been appraised and the basis against which they were considered to be the preferred option.

6.5 As a result, the December 2011 SA Report represented the culmination of the necessary environmental, social and economic evidence gathered throughout the preparation of the Core Strategy, prior to the commencement of the Examination hearing sessions, to support and inform the final version of the Core Strategy.

6.6 Prior to the commencement of the 2012 hearings for the public examination of the Core Strategy, in accordance with the requirements of Planning and Compulsory Purchase Act 2004 s 20(7C) the Council formally requested that the Inspector should make any modifications of the document that would make it one that – (a) satisfies the requirements of 20(5)(a) of the Planning and Compulsory Purchase Act 2004 and (b) is sound and thus capable of being adopted. The Inspector issued his Preliminary Findings and Draft Main Modifications in October 2012; this document was supported by an SA report prepared by the Council at the Inspector's request. A further hearing session took place in 2013, this resulted in the Inspector issuing a

further set of main modifications, these were supported by a SA report again prepared by the Council at the Inspector's request.

6.7 At each stage of producing the Core Strategy, the SA process has sufficiently and comprehensively set out alternative options through all preparatory stages of plan preparation to make it clear how it has identified its preferred option with regard to strategic locations, sites within each strategic location and the policy framework to support the delivery and implementation of the Plan. Moreover, the SA process has, at each stage of the preparation of the Core Strategy, been subject to public consultation in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Strategic Environmental Assessment Directive. Consultation responses have formed part of the iterative process of preparing the SA.

6.8 This has been demonstrated as following the examination the Independent Inspector has concluded that the South Gloucestershire Core Strategy provides a *“sensible strategy for the sustainable development of South Gloucestershire and is sound subject to the recommended main modifications being made”* In coming to this conclusion, the Inspector is satisfied that the Council's SA work complies with the requirements of the Regulations and Directive.

6.9 In conclusion, the council considers that reasonable alternatives have been assessed at each stage of the Core Strategy's production prior to commencement of the Examination hearing sessions (March and December 2010 Draft Core Strategies, December 2011 Core Strategy incorporating Post-Submission Changes). The alternatives assessed at each stage are set out in the December 2011 SA. Moreover, where the Inspector has subsequently published his Main Modifications these have also been supported by the necessary SA and collectively this complies with the Requirements of the Regulations and Directive.

7. Measures to monitor the significant environmental effects of the Core Strategy

7.1 The Core Strategy contains an Implementation and Monitoring chapter which indicates the monitoring that will be undertaken to measure the effectiveness of the Core Strategy in achieving the Visions and meeting its objectives. The monitoring will indicate whether any changes to the Core Strategy need to be considered if a policy is not working or if the targets are not being met. In addition, the Council will use indicators from the Sustainability Appraisal to monitor the potential significant effects of the policies and proposals, as identified through the SA Report. Some policies aim to deliver a qualitative rather than quantitative outcome. In such instances, a measurable target may not be appropriate.

7.2 Monitoring outcomes will normally be reported on an annual basis for a year beginning 1 April and ending 31 March through the Council's Authority's Monitoring Report (AMR). The AMR will identify any objectives and targets that are not being met and any action required to be taken to rectify the situation. The AMR will also be a key source of evidence when we prepare Local Plans. The Report will be published on the Council's website.