

SUSTAINABILITY APPRAISAL OF LOCAL DEVELOPMENT PLAN CANDIDATE SITES

Purpose: To explain the process of Sustainability Appraisal/Strategic Environmental Assessment (SA) of LDP Candidate Sites.

Policy Framework: Planning and Compulsory Purchase Act 2004; The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004;

Reason for Report: To provide the background and methodology to the detailed LDP and SA Assessment scoring matrices provided within the Candidate Site Assessment Reports

Summary :

1. The Council is required by UK & EU legislation to carry out an SA at all stages of plan preparation to improve plan performance and ensure the LDP contributes to sustainable development and highlights/recommends mitigation which informs improvements to site proposals
2. The SA is carried out by scoring candidate sites against a set of 22 SA objectives. The Candidate Site Assessment process also includes assessment against the 24 LDP objectives set out in the Preferred Strategy.
3. SA is an iterative process which has supported the site selection process at all stages and is incorporated into the final stage of the LDP Candidate Site Methodology. Scoring will be continuously refined up to Deposit Stage to take account of updated site information submitted to address issues raised.

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Sustainability Appraisal

Introduction

The Council is required by UK and EU legislation to carry out a Sustainability Appraisal (SA) as part of the Local Development Plan (LDP) process. The purpose of SA is to improve plan performance and ensure that the LDP contributes to sustainable development. This is achieved through a continual process of appraisal during the preparation of the LDP to identify and report on the likely significant economic, environmental and social effects of implementation of the plan and suggest mitigation measures.

SA and LDP Integration

SA should be fully integrated into the plan making and monitoring process. This is the most effective way of ensuring that decisions at each stage of the LDP preparation process accord with sustainable development principles

The SA Framework

The sustainability of the Plan's policies and proposals is assessed against the 22 objectives and indicators set out in the SA Framework which can be found in the Council's SA Scoping Report.¹ The objectives reflect the 12 environmental themes identified in the SEA Regulations and include objectives relating to climate change, economic and social issues, in order to ensure sustainable development issues are addressed.

The LDP Objectives

The 24 LDP objectives are wide ranging and seek to promote all aspects of sustainable development. They provide a clear statement of intent and focus how the LDP Vision will be delivered. They set out the overarching guiding principles for the LDP and set the context for the development of the Strategic Growth and Spatial Options of the Preferred Strategy.

The Candidate Site Assessment Process

Introduction

The SA process makes recommendations for opportunities to improve the sustainable development performance of Candidate Sites by highlighting issues and the need for mitigation. The Council must clearly state how the issues identified and/or any recommendations that emerge from the SA of Candidate Sites have been fully considered, including additional detailed work which be required at planning application stage.

Methodology

The LDP Candidate Site Methodology is set out within the document [Candidate Sites Assessment Methodology \(PDF, 119KB\)](#) which was published in 2010 and includes reference to how sites will be assessed against SA objectives. The methodology proposed that the submitted Candidate Sites would be assessed against a 3 Stage filtering methodology approach, consisting of:

- Stage 1: Initial filtering of sites against constraints
- Stage 2: Detailed appraisal of filtered sites
- Stage 3: Assessment of sites against SA and HRA.

Whilst detailed assessment of sites is not included until stage 3, due to the iterative nature of the SA process, in reality the SA has been carried out and informed plan preparation throughout the process.

Stage 1: Consideration of initial site constraints and identification of potential strategic site areas for the Preferred Strategy.

Sites considered to be totally unrealistic or have fundamental constraints were excluded at this stage. Site owners were however contacted and given the opportunity to provide further evidence to demonstrate that these constraints could be overcome.

¹ Draft SA Scoping Report was published for consultation in 2010 and updated in 2012 to take account of the consultation responses received and the latest available data. The Scoping Report describes the social, environmental and economic characteristics of the area, highlighting key issues that help guide the development of the LDP Vision, Options and Preferred Strategy. The key issues identified help establish the Sustainability Framework. The Scoping Report contained: Plan/Policy/Programme (PPP) Review and Sustainability Objectives; Baseline Information; The SA Framework and SA Objectives

The identification of sites at this stage was done at a broad strategic level. The council carried out a ***Spatial Options Assessment*** which included an SA of four alternative scenarios for the spatial distribution of growth and predicted the likely positive and negative effects of each on the environmental baseline and the Objectives set out in the SA Framework. The SA did not assess specific sites at this stage, as the Options did not define precise site boundaries, but focused on providing a broad geographical outline of how growth could be distributed.

Areas for potential strategic site allocations identified within the Preferred Strategy were deemed to be viable and deliverable. Where issues were highlighted, mitigation requirements were discussed with site promoters in order to feed into the emerging Strategic Site Masterplanning work.

Stage 2: Detailed Appraisals of remaining Candidate Sites.

Following approval of the Preferred Strategy in 2014 all remaining Candidate Sites were assessed to ensure they fitted in with the Preferred Strategy and categorised according to their suitability for inclusion in the LDP. Each site was assessed against:

- Local context and character
- Regeneration opportunities/community and physical infrastructure
- Environmental impact/mitigation
- Accessibility considerations
- Deliverability constraints (flood risk, viability, etc).

The results of these assessments are contained in the Candidate Site Assessment Reports which have been circulated to Members.

These assessments informed the **pre-Deposit Plan and draft Proposals Maps published in 2014**. The Plan illustrated proposed site allocations and revised settlement boundaries in order to enable consideration of the merits of sites before confirmation of the Deposit Plan. Whilst not statutorily required, all Candidate Sites proposed for allocation at this stage were subject to an initial SA.

Stage 3: Detailed SA and LDP Assessments

Following consultation on the pre-Deposit Plan, a more detailed SA of each Candidate Site has taken place to inform the Deposit Plan. Where relevant this has required further refinement of the initial SA to take account of updated information submitted by Statutory Consultees and additional information from site proposers during the consultation. This reflects the iterative nature of the SA process.

Methodology of Stage 3 detailed assessments

The Candidate Sites were subject to an assessment against both LDP and SA objectives. The Candidate Site Assessment Reports are comprehensive and contain a significant amount of detailed information that was used to inform the scoring process.

LDP Scoring

Using information contained within the Candidate Site Assessment Report, the sites were scored against LDP objectives to ensure consistency with the Preferred Strategy. The LDP objectives are clearly focussed on delivering sustainable communities with an emphasis on economic regeneration and development.

SA Scoring

The SA Scoring Key considers how Candidate Sites contribute to sustainability under each of the specific SA objectives (see Appendix). Comments were included against scores where relevant in order to explain the scores and to identify where further information should be sought to improve any significant effects/likely impacts.

It is recognised that some issues would be addressed by other Regulatory regimes, (e.g. sustainable building regulations, pollution prevention and control, etc), but the SA scoring has been deliberately precautionary in order to pinpoint where further detail is required to reduce uncertainty or improve the score, (e.g. where protected species may be present the submission of an ecological survey will enable more accurate scoring). This has also helped highlight issues which are more than site specific and where cumulative impacts could be an issue. It also helps integration with other assessments as part of the SA process, such as the Welsh Language Impact Assessment and the Equalities Impact Assessment of the LDP.

Strategic Sites

SA regulations require assessment of the effects of the LDP both with and without the implementation of the Plan. Therefore, in light of the emerging masterplans following the adoption of the Preferred Strategy, Strategic Sites were subject to a two stage assessment.

- (i) To assess the site in the context of current planning policy i.e. without the LDP. This assumes that proposals will be delivered in the context of a planning application under the existing UDP and EIA requirements. At this stage, scores reflect the current provision of services and facilities which would support the development. This highlights issues which would require mitigation and the improved levels of provision required in order to make development sustainable.
- (ii) Taking into account the proposals contained in the emerging masterplans, i.e. to assess the proposals with the implementation of the LDP. At this stage assessment took into account the context of the LDP Vision and Strategic Policies which seek to deliver sustainable communities, strategic placemaking and supporting infrastructure. By raising strategic issues at such an early stage in the process, it enables them to be addressed by site proposers helping to demonstrate the deliverability and viability of sites. The SA is continually refined as additional/revised information is received either from site proposers or statutory consultees, thus ensuring sites are focused on meeting sustainability objectives.

Non-Strategic Sites

There have been 2 stages of non-strategic site assessment:

1. All A and B-list sites were assessed before draft Proposals Map stage to help determine which sites accorded with the Preferred Strategy and were considered the most sustainable options;
2. Following public consultation on the draft Proposals Map all the sites were assessed again taking into consideration responses received and any new sites that were proposed. This is the current stage and is an on-going process which will continue until Deposit stage, as and when additional information and comments are received.

Mitigation

Scoring considers ways of mitigating adverse effects, i.e. whether there are any measures to prevent, reduce or offset any significant adverse effects of allocating the site. This includes proactive avoidance of adverse effects, as well as actions taken after effects may be noticed. Mitigation measures may also include recommendations for improving beneficial effects. These can include highlighting technical measures to be applied during the implementation stage, e.g. buffer zones, application of design principles, substitution or offsetting and setting out requirements or terms of reference for EIAs accompanying planning applications.

Cumulative Effects

The SA must assess the potential for any cumulative, secondary and synergistic effects from site allocations. Examples of such effects include changes in the landscape, loss of tranquillity, economic decline and climate change. These effects are very hard to deal with on a project-by-project basis through EIA and should be highlighted at the strategic level. Examples of these three types of indirect effect are set out below:

Secondary - a plan proposal that would facilitate or attract other developments, or a proposal that would change a water table and thus affect the ecology of a nearby wetland

Cumulative - plan proposals which on their own might have only an insignificant effect but together would have a significant effect, such as several small housing allocations which together could affect the character of a locality.

Synergistic - plan proposals which could interact to produce a total effect greater than the sum of the individual parts. This may happen when transport, housing and employment proposals each with their own effects, collectively produce a critical mass to produce a more sustainable community. Alternatively, in adverse terms where a wildlife habitat becomes progressively fragmented until a final proposal could make the area too small to support species.

Assessment Against LDP Objectives

+2	Will fully meet LDP objective
+1	Will have positive impact on LDP objective
0	Neutral effect on LDP objective
-1	Will have a negative impact on LDP
-2	Will not meet LDP objective

No.	LDP Objective
1	Communities have a mix of uses and facilities to create sustainable, inclusive neighbourhoods that allow community life to flourish
2	Encourage development of town and district centres as focal areas for regeneration
3	Improve access to health care, lifelong learning, leisure, recreation and other community facilities
4	Promote walking, cycling and public transport as integral elements of a sustainable transport system
5	Facilitate the provision of appropriate utility and transport infrastructure to support communities and businesses
6	Encourage appropriate development of low carbon renewable energy resources and energy infrastructure
7	Support the safeguarding and sustainable use of natural resources where appropriate
8	Facilitate the sustainable management of waste
9	Direct new housing to economically viable and deliverable sites at sustainable locations
10	Support development that positions Swansea as an economically competitive place and an economic driver for the City Region
11	Facilitate growth and diversification of the local economy and an increase in high value, skilled employment
12	Reinforce and improve the City Centre as a vibrant regional destination for shopping, culture, leisure, learning and business
13	Ensure Swansea represents a strong commercial investment opportunity for developers and other partners delivering the Council's priority regeneration schemes
14	Ensure that communities have sufficient, good quality housing to meet a range of needs and support economic growth
15	Promote and enhance a diverse and sustainable rural economy
16	Improve, expand and diversify appropriate sustainable tourism facilities and infrastructure
17	Promote a sustainable development strategy that prioritises the re-use of appropriate previously developed land avoids significant adverse environmental impacts and respects environmental assets
18	Preserve and enhance the County's high quality cultural and historic environments
19	Conserve and enhance the County's natural heritage
20	Maintain and enhance green infrastructure networks
21	Support measures minimise the causes and consequences of climate change
22	Promote good design that is locally distinct, sustainable, innovative and sensitive to location
23	Support the development of safe, accessible and vibrant places and spaces
24	Create environments that encourage and support good health, well being and equality

Assessment Against SA Objectives

Key:

++	Will contribute to sustainability
+	Will result in some positive effects
+/-	Range of positive and negative effects
-	Will have some negative/non-sustainable effects
--	Will have a negative/non-sustainable effect
0	Neutral effects
?	Uncertain effects
X	Not applicable to policy

No.	SA Objective
1	Promotion of sustainable development
2	Maintain and enhance biodiversity resource and protected habitats and species.
3	Increase community safety and sense of security
4	Enable people to meet their housing needs and provide good quality housing
5	Provide high quality, accessible lifelong learning opportunities which meet future needs
6	Encourage an inclusive society and promote equality
7	Support the development of Swansea as a competitive place and contribute to Swansea's role as a regional economic driver
8	Promote and enhance the rural economy
9	Support the development of the environmental goods and services sector.
10	Create social and physical environments that encourage and support health and well-being.
11	Protect soil resources
12	Improve the quality of inland coastal water (surf zone) and rivers
13	Promote the efficient use of water resources
14	Ensure development respects constraints such as floodplains and unstable land
15	Promote an integrated transport system and encourage sustainable travel and development patterns that do not cause significant harm to air quality
16	Support adaptation and mitigation measures due to climate change
17	Improvement in prudent and efficient use of energy
18	Development of appropriate types of renewable energy resources
19	Promote the sustainable management of waste in an integrated manner, aiming towards zero waste by 2050
20	Efficient use of minerals that safeguard existing resources and promote the use of secondary aggregates over primary resources where appropriate.
21	Protect and enhance the quality of the cultural and historic environment
22	Maintain and enhance the quality and distinctiveness of the landscape, townscape and seascape.