PROMOTING SUSTAINABLE DEVELOPMENT THROUGH PLANNING POLICIES
(DRAFT SUSTAINABILITY APPRAISAL SCOPING REPORT)

SUMMARY OF KEY ISSUES RAISED BY CONSULTEES IN RESPONSE TO THE SUSTAINABILITY APPRAISAL CONSULTATION AND MAIN CHANGES PROPOSED TO THE SCOPING REPORT

1.   In total sixty eight individual responses were received, including statutory consultees. A full list of respondents is set out in the Statement of Community Engagement. 25.4% were returned via the on line web form, 46.3% by e-mail, 16.4% by post and a further 11.9% replied via the post and e-mail. **Schedule 1** provides a summary of individual comments made by each respondent, together with a suggested response to the issues raised.

2.   An additional, late consultation was received from the Ministry of Defence (MOD), over three weeks after the close of the consultation. The MOD has submitted some very helpful and comprehensive comments which will be considered and reflected in **Schedule 1**. However, these do not raise any new issues that require additional recommendations.

3.   The key issues raised by consultees and the main changes proposed to the Scoping Report in response to the questions raised in the consultation are summarised below.

Question.1   Are there any other relevant plans policies and programmes that have not been considered in the Scoping Report?

4.   Over 70 additional documents relevant to Wiltshire ranging from Acts of Parliament to Parish Plans and the Town Transport Plan for Corsham have been identified in responses. The documents to be reviewed in the SA should be relevant to the planning policy document being prepared, in this case the Wiltshire Core Strategy. When compiling the original list of plans, policies and programmes to be reviewed a decision was made to:

(i)   Exclude parish plans and conservation area statements at this stage but to bring them into the review when more specific development plan documents are being prepared

(ii)   Exclude emerging policies and plans and programmes as these would be brought into the review once the final document is published

(iii)   Make a distinction between research to provide evidence to emerging policies, for example Strategic Housing Land Availability Assessment and clear policy statements and

(iv)   Make a distinction between practice guidance on process compared to policy statements, for example practice guidance supporting PPS25.

5.   A fifth criteria should be added to this list as guidance issued by the Planning Advisory Service on preparing a SA excludes Acts of Parliament. This is because Acts of Parliament form the legal framework under which the Council operates and is not open to interpretation.

6.   It is **recommended** that the 70 documents proposed in consultation response be assessed using these 5 criteria and any document not within these categories be added to the review of policies, plans and programmes. The review of plans and policies will be continually updated as new guidance and policy documents are published.

7.   The only other main issue raised was the links between the built environment, historic environment and landscape. This is discussed in paragraph 16.

Question 2	**Is the baseline information of sufficient detail and relevance to support the emerging LDF documents?**

8.   Only 21 respondents answered this question directly of which 62% did consider that the baseline information to be of sufficient detail. Concerns expressed the view that the SA was trying to achieve outcomes beyond what the planning system can realistically deliver. Particular issues in relation to climate change and the historic environment are discussed in more detail in **Schedule 1**.

9.   It is **recommended** that the general support for the level of detail within the baseline information to support the emerging LDF is noted.

Question 3	**Can you suggest any other information that might be included in the baseline assessment?**

10.   Very few issues were raised in this section although the some of the data sources in relation to education and the assessment of flood risk were considered to be out of date. Data issues will be addressed as the Scoping Report is updated before publication.

Question 4	**Does the report accurately identify the key environmental and sustainability issues affecting Wiltshire?**

11.   Only 21 respondents answered this question directly of which 71% did consider that the report correctly identified the key environmental and sustainability issues affecting Wiltshire. Concerns were expressed that Groundwater Source Protection Zones have not been mentioned.

12.   It is **recommended** that the general support for the key environmental and sustainability issues in the SA Framework is noted.

> **Question 5   Can you suggest any other key environmental and sustainability issues?**

13.   Over 90 individual comments were submitted in response to this question. For the most part these comments raised specific issues although there was concern expressed that some of the environmental and sustainability issues came across as statements of fact rather than 'issues to be addressed' this is a valid comment.

14.   It is **recommended** that the content of Table 5.1 in the Scoping Report is reviewed to make sure each statement reflects an issue to be addressed rather than a statement of fact. This is a presentational matter and should not result in the nature of the issues identified being changed (subject to specific changes proposed in **Schedule 1**).

15.   The key issues identified in Table 5.1 are derived from the document review and baseline data set out in the accompanying Topic Papers. In order to add new issues to the Table the statement needs to be supported by evidence coming from the document review or an analysis of the baseline data. It is also important to remember that the SA Scoping Report is not a statement of policy for the new Council and the Wiltshire Core Strategy. It is the process for testing the policies and proposals developed in the Core Strategy which is itself based on an evidence base relating to the scope of the Core Strategy. When considering responses to the consultation, and amendments to be made, the following guidelines were used:

(i)   Relevance of the issue raised to the scope of the SA, for example, the question of litter raised by CPRE

(ii)   The evidence already presented in the accompanying Topic Paper and the availability of data to support a claim, for example, the freight impact of minerals and waste transportation raised by the Minerals and Waste Policy Team;

(iii)   Consider whether the issue raised is a matter for policy development through the Core Strategy or within the scope of the SA, for example, the question of the appropriate scale and location of development raised by Hunter Page on behalf of Colerne Industrial Estates.

16.   Using these principles as a guide a number of amendments are proposed in **Schedule 1**. The most significant changes are proposed to Topic Paper 12 on Transport where a lack of accurate and up-to-date data is perceived and Topic Papers 6 (Historic Environment) and Topic Paper 7 (Landscapes). Many respondents felt there was a lack of clarity between these later two Topic Papers, particularly in how the built environment is included.

17.   It is **recommended** that Topic Papers 6, 7 and 12 are reviewed to improve the accuracy and breadth of the data they contain, and in relation to Topic Papers 6 and 7 to clarify the scope of the information they contain. Specific matters of detail raised in the consultation should be added to all Topic Papers where they are within the scope of the SA and relevant supporting data is available.

Question 6	**Are the proposed sustainability objectives appropriate for appraising the social, environmental and economic effects of the plan?**

Question 7	**Are the proposed sustainability objectives correctly worded?** **Can you suggest alternative objectives for possible inclusion within the SA Framework?**

18.   Twenty two people responded to Question 6 of which 64% agreed that the sustainability objectives were appropriate with 18% expressing the view that changes should be made. Twenty one people responded to Question 7 giving rise to 109 separate comments.

19.   Most of the specific comments in response to Questions 6 and 7 related to the 'decision aiding questions' (DAQs) supporting each objective rather than the detailed wording of the objective. DAQs are included in the framework to help the person carrying out the SA consider the most relevant issues when thinking whether a particular policy or proposal moves towards achieving each individual sustainability objective. For example, does a housing policy promote a design which can reduce crime or fear of crime to help move towards providing a safe and healthy environment? (Objective 11) The list of DAQs are derived from the key environmental and sustainability issues identified by the report but are not intended to imply these are the only questions that can be asked. They will develop and be amended to reflect the stage and level of the SA being carried out.

20.   It is **recommended** that the additional decision aiding questions proposed by respondents are included in the Scoping Report where they do not repeat existing areas of questioning, are relevant to the scope of the SA and enhance the decision making process.

Question 8	**The sustainability appraisal framework contains a set of possible indicators. Can you suggest other more appropriate indicators?**

21.   Once the SA process has begun it is necessary to monitor changes in the baseline environment as a consequence of policies or proposals in the document that was appraised. It is not always possible at the outset to decide the most appropriate indicators to use for each objective. The indicators have to cover an area of data that can be directly affected by decisions made within the planning system. This is why in the draft SA framework these are identified as 'possible indicators'. Clearly the percentage of dwellings completed on previously developed land is as a direct consequence of the planning system. In contrast changes in biodiversity on designated sites can be a consequence of many factors outside the scope of planning.

22.   It is **recommended** that Members acknowledge that a decision on the indicators to be used for monitoring the sustainability affects of the plan on each objective needs to be refined once the appraisal process begins.

| Question 9 | Any other comments |

23. The final group of comments are general, often observations rather than comments that require an amendment to the scoping report. Issues that have been raised repeatedly are:

   (i)   The perceived limited scope of the consultation that took place

   (ii)   The complexity of the document and the breadth of subjects covered

   (iii)   Corrections to matters of fact, for example, SACs cover habitats and species not just plants

   (iv)   Typographical errors

   (v)   Comments of support

   (vi)   Comments more relevant to policy development within the Core Strategy rather than the SA process and

   (vii)   Detailed matters referred to already within the SA but requiring further clarity.

24. **Schedule 1** includes a full list of these other comments and a suggested response from the Council.

25. It is **recommended** that Members' note the actions proposed in **Schedule 1** and delegate authority to the Director, Economy and Enterprise to make the consequential changes to the Scoping Report.

Stakeholder Workshop

26. A stakeholder workshop was held on the 21 January to facilitate more detailed discussion about the draft Scoping Report. Membership of the workshop was designed to represent the main strands of sustainability, namely; social, economic and environmental, and included participants from the three main statutory consultees. Other participants were invited to represent each of the Wiltshire Local Area Agreement thematic groups. The stakeholder workshop focussed on the identified environmental and sustainability issues included within the draft Scoping Report and the proposed SA objectives.

27. The workshop was very successful and overall support was received for the draft Scoping Report. A full report of the meeting is included in the Statement of Community Engagement available on the web site. .http://www.wiltshire.gov.uk/environment-and-planning/planning-home/sustainability-appraisal-consultation.htm A number of specific technical additions were identified. These included the need for additional detail concerning soil quality within the baseline section of the report, highlighting the significance of climate change, the need to highlight the role of the MOD across the Council's area and the need for clarity between the content of the Landscape and Historic Environment Topic Papers.

28. It is **recommended** that the detailed comments generated at the stakeholder meeting be incorporated in the final Scoping Report. The stakeholders that attended the first meeting of the Group have committed to reconvening the Group at key stages in the SA process in the future.