

Sustainability Appraisal Adoption Statement

Stockton-on-Tees Local Plan 2017 – 2032

January 2019

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1. Introduction

Stockton-on-Tees Borough Council adopted the Local Plan 2017 – 2032 on 30th January 2019. There is a statutory requirement to prepare Sustainability Appraisals to support spatial development plan documents under the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires documents such as the Local Plan to be prepared with a view to contributing to the achievement of sustainable development. There is also a requirement to produce an environmental report in line with the Environmental Assessment of Plans and Programmes Regulations (2004).

The Sustainability Appraisal process is a tool to enable social, economic and environmental issues to be considered during the production of plans and strategies with spatial implications, including Local Plans, promoting strategy or policy that is sustainable, and ruling out alternative strategy or policy which is deemed unsustainable. Undertaking this process can improve the overall sustainability of the Local Plan, whilst documenting how the plan meets the legal and policy requirements.

Strategic Environmental Assessment (SEA) involves evaluation of the environmental impacts of a plan or programme. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the 'Environmental Assessment of Plans or Programmes Regulations 2004'. The SEA process is very similar to the Sustainability Appraisal process however it is only concerned with environmental impacts as opposed to the addition of social and economic impacts within the SA. There is also more prescriptive guidance and tasks that need to be followed in order to meet the SEA Directive's requirements.

Best practice encourages the SEA process to be incorporated into the Sustainability Appraisal due to their similarity in aim and methodology. This enables social, environmental and economic effects to be considered together in order to document the full picture of sustainability and to show a holistic outcome. National Planning Practice Guidance states that 'where the [SEA] Directive applies there are some specific requirements that must be complied with and which, in the case of Local Plans, should be addressed as an integral part of the sustainability appraisal process'¹.

This 'Post Adoption Statement' is prepared in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations (2004) which requires Local Planning Authorities to produce an environmental report to accompany an adopted Local Plan. Part 4 of Regulation 16 states that such a report must contain the following elements:

- 1) How environmental considerations have been integrated into the plan or programme;
- 2) How the environmental report has been taken into account;
- 3) How opinions expressed in response to public consultation² have been taken into account;
- 4) The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and
- 5) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

Stockton-on-Tees Borough Council has followed best practice by incorporating the SEA into the SA, and as such this statement provides information beyond the environmental particulars

¹ National Planning Practice Guidance, Ref: 11-002-20140306

² Regulation 13(2)(d) and 13(4).

listed above to include the broader sustainability appraisal process undertaken. This statement examines each of the five points in turn, in the following sections 2 – 6.

2. How sustainability considerations have been integrated into the Local Plan

In order to carry out a Sustainability Appraisal of the Local Plan, key issues and challenges facing the Borough were identified and a sustainability framework and objectives were established against which the vision, strategy, and planning policies could be assessed to ensure the Plan represented the most sustainable future for Stockton-on-Tees.

A Scoping Report was published and consulted upon in July 2016. The purpose of this Scoping Report was to determine the scope and level of detail of the Sustainability Appraisal (SA). It set out the results of the initial stage of the SA for the Local Plan including a comprehensive source of baseline information on economic, environmental and social objectives. The scoping report also proposed a list of sustainability issues and objectives that were relevant to Stockton-on-Tees Borough Council and set a sustainability framework against which the Local Plan options, and those of other spatial planning policies, could be assessed. This stage presented the data that was collected and analysed to establish the current position with regard to social, economic and environmental aspects so that predicted future impacts of strategy, policies and sites within the Local Plan could be predicted.

The baseline position of Stockton-on-Tees was set out which then helped to identify sustainability issues and also aimed to predict where they could arise in the future both with, and without a Local Plan in place.

A summary of the issues identified at scoping stage included:

Social

- A need to support communities to be active and involved in shaping their neighbourhoods.
- An ever increasing demand on volunteers and the voluntary / community sector to support community functions with reducing resources.
- A need to facilitate and encourage cohesive, healthy and integrated communities.
- A high demand for housing units, but a housing stock with high numbers of older, urban solid wall terraces and social housing units.
- Net additional dwellings had been well below the required rate for many years.
- Health inequality is high within the Borough with significant disparity in health parameters between wards including life expectancy.
- Poor health is a barrier to people gaining skills and employment.
- Negative trends in crime and anti-social behaviour, with disparity in crime and disorder between wards.

Economic

- Wages remain high relative to other Local Authorities in the North East however there is a disparity within the Borough with some areas exhibiting a high proportion of residents suffering from income deprivation.
- The overall employment rate is higher than the regional average however there is still a need for job creation to ensure the employment rate in the borough improves in line with national averages.
- The skills profile of the borough is similar to national averages with levels higher than most other North East local authorities.
- Employers still report skills gaps and challenges recruiting skilled staff, with skills levels varying significantly within the Borough.

- An ageing workforce will result in a high proportion of the workforce retiring in the near future which could create and intensify issues relating to skills in the labour market.
- Public transport patronage is declining, whilst car ownership is increasing.
- Bus usage in the borough is lower than regionally and nationally whilst train passengers at 4 of our 5 stations are estimated to be increasing. Limited direct links from our train stations to major UK cities is a hindrance to economic growth.

Environmental

- Stockton-on-Tees is a relatively significant contributor of greenhouse gasses, this almost entirely resulting of its heat and CO2 intensive process and manufacturing industries.
- The strong cluster of existing process industry and its associated skills is a real opportunity to build a thriving clean, low carbon economy. The Borough possesses significant biodiversity and geodiversity interest however parts are in an unfavourable condition and over half of all SSSIs are in decline.
- Air quality is generally good across the whole Borough with no Air Quality Management Areas designated.
- Data for the 9 water bodies that flow through the Borough show that none are classified as good.
- Baseline data showed that waste and recycling levels need significant improvement.

As part of the scoping stage, we then consulted widely with our statutory and non-statutory partners not only on the scope of the full sustainability appraisal but on a revised set of sustainability objectives to ensure that stakeholders across the borough had an opportunity to shape the appraisal process to be employed. Following the consultation in July and August 2016, we reviewed responses and made amendments as necessary to strengthen our framework and appraisal process, resulting in a set of 16 SA objectives to replace the previous 10 objectives established back in 2005. The 16 SA objectives can be found on page 56 of the Scoping Report.

Each of the proposed sustainability objectives was also matched with decision making criteria to be used in the full SA, together with a series of policy specific questions used to challenge the proposed policy or development presented in the Local Plan. This provided a framework to understand relative impact, positive, neutral or negative and be informed by the baseline data and evidence gathered as part of the Scoping Report.

The Sustainability Appraisal of the Local Plan tested the proposed vision, strategy, policies, housing sites and employment sites within the Plan against these sustainability objectives at each stage, and also tested a range of reasonable alternatives. The SA addendum published in September 2017 extended the appraisal of housing sites overall strategy for the Publication Draft Local Plan. The Strategic Housing Land Availability Assessment (SHLAA) was undertaken and 49 sites were considered suitable, available and achievable, and therefore these were subject to SA. However, those that were not determined to be 'suitable, available and achievable' in the SHLAA were also subject to SA in 2017, despite the fact that by definition they were not considered 'reasonable alternatives'. It did however give strength to the overall appraisal of the housing sites. By doing this, all reasonable alternatives were considered and their relative sustainability recorded to determine the most sustainable strategy, policies and sites for inclusion within the Local Plan. This ensured that the plan itself is the most sustainable given all reasonable alternatives.

3. How the SA reports have been taken into account

A Sustainability Appraisal Scoping Report (incorporating Strategic Environmental Assessment) was published and consulted upon in July 2016. This allowed statutory consultees and other interested parties to comment on the baseline information, the sustainability issues identified, and the Sustainability Framework that had been established.

Comments received during the Scoping Report consultation were acknowledged, informed amendments where appropriate, and helped inform future stages of the SA process.

The Sustainability Appraisal was undertaken alongside the development of the Local Plan, informing each stage of its progression. It has been reviewed, updated and published for consultation alongside each of the key stages of the Plan's preparation, including an appraisal of the proposed Main Modifications during the examination of the Local Plan.

The following stages of the Local Plan were accompanied by a Sustainability Appraisal and subject to a minimum 6-week consultation period:

- Consultation Draft (October 2016)
- Publication Draft (September 2017)
- Housing requirements and alternative options (March 2018)
- Main Modifications Report (September 2018)

The Draft Plan and SA report were subject to a number of representations during the consultation period in October 2016 and subsequently all were subject to some revision. At publication draft stage further SA was undertaken and the purpose of the publication of the addendum was twofold:

- i) demonstrate that appropriate consideration had been given to the potential implications of minor amendments being proposed and where those would not have any significant impact on the effects of policies already considered in the SA Report, they did not require detailed appraisal and/or mitigation
- ii) where amendments are being proposed that would have a significant impact, such as any additional housing or employment sites, cumulative impacts etc. that they were considered, appraised and reported on in the addendum report, and any mitigation required was proposed.

Part of this assessment focused on the assessment of strategic housing options and housing sites, which appraised the options included in the housing strategy of the plan, as well as the assessment of employment options, which appraised the Local Plan approach to allocating sites for economic growth.

An appraisal of varied and alternative levels of housing requirements was not included in the original Regulation 18 SA report, on the assumption that the robust evidence base that led to the Objectively Assessed Need (OAN) for housing resulted in it being determined as a sustainable option. At the Regulation 19 consultation in September 2017, the Council supplemented the OAN with a Housing Requirement Topic Paper which justified the Local Plan housing requirement referenced in this report and also considered an uplift to the housing requirement as the Council has identified that it cannot meet the affordable housing needs.

After the submission of the Local Plan, it was considered that this position could be supported if the housing requirement and other housing requirements within reason were subjected to appraisal via the agreed SA methodology. This appraisal of housing requirements could identify if alternative housing requirements have the potential for a positive or negative impact

upon sustainable development, and how this differs from the impacts from the Objectively Assessed Need. This was undertaken in March 2018.

Main Modifications were proposed to the Local Plan during the Examination in Public (EiP), and were required to help ensure the Plan was sound and legally compliant. A further Sustainability Appraisal report was therefore provided to ensure that the potential social, environmental and economic effects of the proposed Main Modifications were fully assessed for significant sustainability impacts, and reported on as part of the Plan making process.

In addition to the Main Modifications, there were a number of other, minor changes to the plan proposed. These 'Additional Modifications' did not affect the soundness of the plan, but were concerned with ensuring that the text of the plan was clear, consistent, and as up to date and accurate as possible. As such, they were not subject to SA due to the minor nature of them but were consulted on for completeness.

The expected impact of the Plan's strategy and policy options were considered against each of the sustainability objectives. The analysis was simplified by using the following methodology:

Score	Description of impact of objective, policy or scheme	Symbol
Major positive Impact	The site / proposal is likely to have a significant positive impact on sustainability	++
Minor positive impact	The site / proposal is likely to have a positive impact on sustainability	+
Neutral impact	Impact on sustainability is likely to be neutral	0
Range of impacts	A combination of impacts on sustainability will result from site or policy and they range from positive to negative.	+ / -
Minor impact	The site / proposal is likely to have a negative impact on sustainability	-
Major impact	The site / proposal is likely to have a significant negative impact on sustainability	--
No relationship	There is no relationship between the policy or proposal and sustainability	X
Uncertain	It is not possible to establish effect on sustainability	?

In order to aid the assessment process, a series of 'decision making criteria' were provided to help explain the issues associated with each objective and clarify the assessment process to those involved. A successful participatory approach was adopted, particularly the involvement of 43 individuals via three appraisal workshops including representatives from the voluntary

and community, public and private sectors. This provided the benefit of bringing a wide range of expertise on specialist subjects to the assessment process, delivering a 'sense check' on all the policies and proposals being brought forward, and a cross-analysis of the Local Plan to ensure there was no conflict, and where conflict existed, it was resolved and mitigated.

At each stage, the findings of the Sustainability Appraisal (incorporating SEA) informed the development of the Local Plan and provided sustainability context to the plans proposals. For example in terms of meeting housing need, from a strategic perspective a number of options were identified and assessed against sustainability objectives. The 'Regenerated River Tees Corridor' strategic option performed positively against a range of sustainability objectives, while village extensions performed poorly. However as the housing requirement cannot be met solely by any one of the strategic options, it was necessary for the approach to housing distribution to be based on a range of sites across the strategic options as appropriate. All sites were subject to SA and it was concluded that sustainable development can in the first instance be delivered through the delivery of sites within the Regenerated River Tees Corridor and the conurbation. This is one example of how sustainability has been at the heart of the development of the Plan.

4. How opinions expressed during consultation have been taken into account

Each stage of the Sustainability Appraisal has been subject to public consultation with each consultation period has been aligned with consultation on the Local Plan, and lasted a minimum of 6 weeks.

Consultation on the SA has been undertaken at the following stages:

- Scoping Report (July 2016)
- SA Main Report – Consultation Draft (October 2016)
- SA Addendum to Main Report – Publication Draft (September 2017)
- Sustainability Appraisal of Alternative Housing Requirements (March 2018 paper published during Examination in Public and subject to consultation as part of Main Modifications report)
- Main Modifications Report (September 2018)

All stakeholders and consultees held in the consultation database, including statutory consultees, were notified of each opportunity. Therefore a range of individuals, residents, organisations and statutory providers have been invited to comment on the SA/SEA throughout the plans development.

All comments made at each consultation stage have been made available for inspection, and also in summary format.

Comments received during consultation have informed future stages of the SA/SEA. In particular:

- A revision from 10 SA objectives to a new set of 16 sustainability objectives as part of the initial consultation in 2016 and development of the new sustainability framework.
- 11 individual or organisational responses at Scoping revised the new objectives SA8 and SA16 to include conservation (SA8) and stronger and cohesive communities (SA16) further strengthening later SA stages.
- Inclusion of 'best and most versatile agricultural land' to plan consideration through the SA process.
- 43 individuals contributing via 3 one day workshops to the initial appraisal of policies, housing and employment sites.

- Where policies were added, deleted or significantly amended through the plan development process (particularly by the Inspector during the Examination in Public) the effect of adding/removing the policy was appraised and then subject to consultation.

A list of the 'key targeted consultation bodies' consulted can be found within Appendix 1 of the Publication Draft Local Plan Consultation Statement. These key stakeholders and duty to co-operate partners were sent letters and e-mails inviting views on any issues they considered should be covered and/or addressed through the emerging Local Plan and its Sustainability Appraisal.

The SA/SEA has therefore responded to comments received during the formal consultation processes. The SA/SEA has been subject to extensive public consultation at all stages of preparation, in accordance with the relevant regulations. This has provided interested parties with the opportunity to comment on the appraisal, and modifications to the appraisals have been made where relevant – this has led to a robust appraisal, scrutinising the scoring and conclusions, which ensures the most sustainable options have been chosen. This in turn has led to the Local Plan containing the most sustainable strategy and policies, given all reasonable alternatives.

5. Choosing the Adopted Local Plan in light of the other reasonable alternatives

Following the Scoping Report in July 2016, a Draft Local Plan was produced and this was the first stage of the SA process that set out the preferred vision, strategy and plan policies, alongside all reasonable alternative strategy/policy options considered. As the SA process is an iterative process, further options have been included at each future stage, and appraised as necessary.

The Local Plan is made up of the following sections and each was accompanied by a sustainability appraisal:

- Vision and Strategic priorities: Overarching vision for the Borough, 11 strategic objectives and 8 policies to deliver them.
- Housing policies and sites: Determining the most sustainable level and location of housing that the Borough can accommodate, including consideration of unmet housing needs from neighbouring authorities.
- Economic Growth policies and sites: setting out the most sustainable way to distribute planned growth within Stockton-on-Tees.
- Transport and Infrastructure policies and proposals.
- Natural, Built and Historic environment policies.

In addition to the Vision and Strategy, each of the Local Plan policies was appraised.

The sustainability appraisal has evaluated the likely significant effects of the Stockton-on-Tees Draft Local Plan on the environment, and the broader sustainable development of the Borough, and has been produced in accordance with Regulation 12(5).

The appraisal process provided well-considered assessments of the policies and proposals being brought forward, and identified where the Plan is strong, but also where future mitigation needs to be considered. This report does not define what that mitigation should be, where it should be or to what scale, as that should be determined at a later stage.

The main findings from the SA/SEA were as follows:

Findings against economic objectives

The Local Plan includes specific policies which aim to stimulate sustainable, clean economic growth and these show to inevitably have significant positive benefits against economic objectives. There are also economic benefits likely to be achieved from policies promoting housing, infrastructure and transport, and clean carbon growth. The appraisal demonstrated that allocations for employment development would result in inward investment that would have secondary positive effects on local businesses and the supply chain. The SA observed some uncertainty around how a significantly growing economy and additional employment sites would perform against safer and stronger communities.

Findings against environmental objectives

The Local Plan contains policies that aim to protect and enhance the Borough's built and natural environment. Overall, positive impacts are likely to be expected from most policies, including some of those promoting clean, economic growth in the Borough. This is because the policies have demonstrated that they are well balanced, do not restrict development but consider environmental objectives, whilst ensuring that the valuable natural environment in Stockton-on-Tees is protected, for example the focus on developing sites on brownfield or previously developed land.

This includes strong policies around energy and low carbon, green infrastructure, biodiversity and the heritage environment. It was observed through the SA that there is some uncertainty around how a significantly growing economy and additional employment sites would perform against immediate local air quality.

Findings against social objectives

There is an overall positive impact to be expected from the Local Plan in terms of the social objectives. The Plan includes many policies that have direct impacts on these objectives, in particular policies facilitating housing and employment growth, and health. There are also a number of secondary benefits from policies relating to the environment – for example, provision of green infrastructure, access and open space, which can have social (health) benefits. Some potential negative social impacts may arise in relation to how significant economic growth would perform against safe and stronger communities.

In each case, the most sustainable policy option was chosen. Inevitably, the most sustainable option overall may also contain some neutral and / or negative impacts on some objectives but in these instances it has been identified that mitigation would need to be considered at the appropriate time, or be supported by other policies in the plan. Overall, it is concluded that the Local Plan will have a generally positive impact on the sustainability objectives. The Inspector's Report (December 2018) for the Local Plan confirms that the SA has been undertaken adequately, and notes that it has had an influence on the development of strategy and policies within the plan (particularly related to housing provision and housing sites).

6. Monitoring

The effects of the Local Plan need to be monitored to identify any unforeseen, adverse effects and to allow for remediation action to take place. The Council also has responsibility to prepare and maintain a Local Development Scheme (LDS) through the Planning and Compulsory Purchase Act 2004. The main purpose of the LDS is to enable the local community and any other interested person, company or organisation to find out the planning policy documents that the Council intends to produce and the timetable for their production. Stockton-on-Tees Borough Council's LDS was agreed under delegated powers in 2016.

The Council also produces an Authority Monitoring Report (AMR) on an annual basis. This document contains information on the implementation of the LDS and also monitors the success of the policies set out in the Local Plan. How well the Council has performed against the timetable set out in the LDS will be published in the Authority Monitoring Report. This will identify any changes needed to maintain an up to date Local Plan and will determine the need to review the LDS. The Sustainability Appraisal is referenced in section 26 of the LDS, and there is complete consistency between the Sustainability Appraisal and the LDS. Section 4.2 of the Scoping Report "Baseline information and evidence" includes indicators that are included in the AMR to ensure that we can monitor the direction of travel of the 16 sustainability objectives used to measure the plan can be monitored.

There is also a requirement to "...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" and include "a description of the measures envisaged concerning monitoring".

If it appears that policies are not effective, or are no longer appropriate in the light of more recent national policies or local circumstances, then action will be taken to review the policy or policies concerned.