

Gedling Borough Council

Response to Matter 2

Sustainability Appraisal

Issue 2a: Soundness of the Sustainability Appraisal

Q1. Is the Plan based on a sound process of Sustainability Appraisal?

- 2.1 Yes. The Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) explains how the Sustainability Appraisal was carried out. Table 1 (on pages 24 and 25) shows how the requirements of SEA Directive are met in the Sustainability Appraisal. Paragraph 2.12 states that the Council's approach to undertaking Sustainability Appraisal is based on the Government's Planning Practice Guidance, which is designed to ensure compliance with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Directive. The methodology used for the Sustainability Appraisal for the Local Planning Document develops the approach used to appraise the Aligned Core Strategy which was found sound.
- 2.2 Section 5 of the Sustainability Appraisal Publication Draft Main Report refers to the Scoping Report (2013) which explained that as the issues have not changed significantly since the Aligned Core Strategy, it was viewed appropriate to use the same SA Framework to test the sustainability of the Local Planning Document. The SA Framework has been amended as the result of consultation comments received on the Scoping Report and also comments received on the Sustainability Appraisal of the Publication Version of the Aligned Core Strategy. In the light of the latter, the colour coding scheme was amended to ensure that the colour coding was consistent between the SA assessment and the SA objectives. In addition, an SA matrix was created and used for the assessment of the sites for consistency purposes. The SA Framework was used to assess the reasonable alternative options for the policies and the proposed development management policies. The SA Matrix was used to assess the reasonable alternative options for the sites and the proposed site allocations.

Q2. Has the Sustainability Appraisal been undertaken at each stage of the Plan's preparation to clearly justify the Council's policy choices?

- 2.3 Yes. The Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) explains how the Sustainability Appraisal was carried out. The SA assessment was undertaken at each stage of the Plan's preparation. Section 8 refers to the SA assessment of the reasonable alternative options

for the development management policies and Section 10 refers to the SA assessment of the reasonable alternative options for the site allocations.

Q3. Does the Sustainability Appraisal process represent the only site selection methodology or has the Council used any other process?

2.4 This question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 39 on page 6. The Council's response is provided in the Council response to initial questions (**EX/08**) – see page 27.

Q4. Does it test reasonable alternatives? Has the Sustainability Appraisal been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?

2.5 All reasonable alternative policy options, whether taken forward in the Local Planning Document or whether rejected, have been assessed using the same methodology. Similarly, all reasonable alternative sites (whether taken forward as allocations or whether considered unsuitable for allocation) have been assessed using the same methodology. The findings of the SA assessment are in the Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) – Section 8 looks at the SA assessment of the reasonable alternative options for the development management policies and Section 10 looks at the SA assessment of the reasonable alternative options for the site allocations. The second question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 39 on page 6. The Council's response is provided in the Council response to initial questions (**EX/08**) – see page 27.

2.6 The Council has undertaken a further Sustainability Appraisal on the alternative sites proposed through the consultation exercise which had not been assessed previously. Further details are provided in the Sustainability Appraisal Publication Draft Addendum: Alternative Sites to the Site Allocations for Housing (**LPD/REG/20**). In response to the Inspector's initial question regarding the approach taken to the reduced housing in the key settlements of Bestwood Village, Calverton and Ravenshead (i.e. paragraph 23 on page 4), the Council has undertaken a further Sustainability Appraisal. Further details are provided in the Sustainability Appraisal Publication Draft Addendum 2: Appraisal of Housing Distribution for Key Settlements and Policies LPD62 and LPD63 Local Planning Document (**EX/12**).

Q5. Is the Sustainability Appraisal decision making and scoring robust, justified and transparent?

2.7 Section 5 of the Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) explains the SA Framework has been amended as a result of the consultation comments received on the Scoping Report and also the comments received on the Sustainability Appraisal of the Publication Version of the Aligned Core Strategy. In the light of the latter, the colour coding scheme was amended to ensure that the colour coding was consistent between the SA assessment and the SA objectives. In addition, an SA matrix was created and used for the assessment of the sites for consistency

purposes. The SA Framework was used to assess the reasonable alternative options for the policies and the proposed development management policies. The SA Matrix was used to assess the reasonable alternative options for the sites and the proposed site allocations. The detailed SA assessments are provided in Appendices B to H of the Sustainability Appraisal Publication Draft Main Report, Appendix 1 in the Sustainability Appraisal Publication Draft Addendum: Alternative Sites to the Site Allocations for Housing (**LPD/REG/20**) and the Appendices in the Sustainability Appraisal Publication Draft Addendum 2: Appraisal of Housing Distribution for Key Settlements and Policies LPD62 and LPD63 Local Planning Document (**EX/12**).

- 2.8 For the Development Management Policies, Section 8 of the Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) looks at the findings of the SA assessment of the reasonable alternative options for the development management policies and explains the decision making through the Local Planning Document process.
- 2.9 For the site allocations, Section 10 of the Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) looks at the findings of the SA assessment of the reasonable alternative options for the site allocations. Paragraph 10.151 states the Site Selection Document (2016) explains how the allocated housing sites have been chosen from the 114 reasonable alternative sites and Table 18 identifies those which have been allocated for housing. Paragraph 10.151 states the Employment Background and Site Selection Paper (2016) explains how the employment allocated sites have been chosen from the 4 reasonable alternative sites and Table 19 identifies those which have been allocated for employment.

Q6. How has the Sustainability Appraisal process given appropriate consideration to minerals and coal mining issues? Has the Sustainability Appraisal taken into account the presence of, and implications of, Minerals Safeguarding and Consultations Areas?

- 2.10 The first question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 40 on page 6. The Council's response, which relates to both questions, is provided in the Council response to initial questions (**EX/08**) – see page 28.

Q7. Does it represent the most appropriate strategy in the circumstances?

- 2.11 The Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) looks at the findings of the SA assessment of the 61 development management policies in Part A of the Local Planning Document (section 9). Section 11 of the Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) and the Sustainability Appraisal Publication Draft Addendum 2: Appraisal of Housing Distribution for Key Settlements and Policies LPD62 and LPD63 Local Planning Document (**EX/12**) looks at the findings of the SA assessment of 9 policies relating to site allocations in Part B of the Local Planning Document.

- 2.12 It should be noted that the three SA consultation bodies (Environment Agency, Historic England and Natural England) did not raise any concerns through the consultation on the Local Planning Document Publication Draft.

Q8. Does the final report set out the reasons for rejecting earlier options?

- 2.13 Section 8 of the Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) looks at the findings of the SA assessment of the reasonable alternative options for the development management policies and explains the decision making through the Local Planning Document process. This section sets out the reasons for not progressing those options not carried forward to the Publication Draft Local Planning Document.
- 2.14 Section 10 of the Sustainability Appraisal Publication Draft Main Report (**LPD/REG/11**) looks at the findings of the SA assessment of the reasonable alternative options for the site allocations. It explains that the Site Selection Document (2016) sets out how the allocated housing sites have been chosen and the Employment Background and Site Selection Paper (2016) explains how the employment allocated sites have been chosen. Section 10 does not include the reasons for the options being rejected. Rather, the recommendations are provided in the Site Selection Document appendices (**LPD/GRO/06** to **LPD/GRO/14**) and the Employment Background and Site Selection Paper (**LPD/BACK/02**). Section 3 of the Site Selection Document - Main Report (**LPD/GRO/05**) explains the Sustainability Appraisal was one of the key factors in the site selection process.

Conclusion

- 2.15 It is considered that the requirements of SEA Directive are met in the Sustainability Appraisal.

Further Proposed Changes

- 2.16 No further proposed changes are being put forward at this stage.