



Telford & Wrekin Local Plan 2011-2031

**Sustainability (Integrated) Appraisal (SA),
incorporating
Strategic Environmental Assessment (SEA)**

SA/SEA Adoption Statement

January 2018

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Telford & Wrekin Local Plan (TWLP) 2011-2031

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Contents:

This SA/SEA Adoption Statement

Development of the Telford & Wrekin Local Plan (TWLP) 2011-2031

How environmental & sustainability considerations have been integrated into the Local Plan; How the Sustainability/Environmental Report has been taken into account

How the results of consultation have been taken into account

Reasons for choosing the Telford & Wrekin Local Plan as adopted, in the light of other reasonable alternatives

Measures that are to be taken to monitor the significant sustainability/ environmental effects of the implementation of the Local Plan

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This SA/SEA Adoption Statement

1. Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan relating to development. The SA incorporates the requirements for Strategic Environmental Assessment (SEA). The Sustainability Appraisal/Environmental Statement for the Telford & Wrekin Local Plan 2011-2031 has been prepared in accordance with the following requirements:
 - Regulation 36 of the Town & Country Planning (Local Development) (England) Regulations 2004
 - Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004
 - Paragraph 165 of the National Planning Policy Framework 2012

For the purpose of this Statement that complies with planning and environmental assessment Regulations, the integrated appraisal will be referred to as the Sustainability Appraisal (SA).

2. The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations¹ and as guided through Government Planning Practice². This SA Adoption Statement satisfies the requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:

(a) how environmental considerations have been integrated into the plan or programme;

(b) how the environmental report has been taken into account;

(c) how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;

(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;

(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and

(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

Development of the Telford & Wrekin Local Plan (TWLP) 2011-2031

3. The Local Plan sets out an overall strategy to guide development across the borough in the period up to 2031. It sets out how much new development

¹ <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

(land for housing and employment) is needed and where this development should take place as well as provides information about the infrastructure (roads, schools, open spaces, etc) needed to support new development. The plan has been developed through an iterative process with comments made through public consultation being taken into consideration at each stage.

4. The development of the Local Plan has been ongoing since early evidence gathering in 2011-2012 that informed the development of the Shaping Places Strategy & Options that were subject to public consultation in June-July 2013. The Council considered representations made to help inform the next stage of plan-making - options for site allocations were investigated and the proposed Housing & Employment Sites were subject to public consultation in May-June 2014. Comments received were again taken into account to inform the preparation of the Draft Local Plan with public consultation August-September 2015 and the publication version of the Plan that was subject to public consultation February-March 2016. The Local Plan was submitted to the Secretary of State in June 2016 to be examined by an independent Inspector.
5. Considerable work and consultation has been undertaken since 2011 and 2016 to prepare the Local Plan, including SA/SEA in accordance with the National Planning Policy Framework (NPPF, 2012) and planning practice guidance. Various studies were undertaken to provide the evidence base to inform decision-making, including housing and employment needs; land availability; retail & leisure; landscape sensitivity & capacity; green infrastructure; transport modelling; air quality; water cycle study and strategic flood risk assessments; waste; infrastructure delivery studies, and assessments of potential strategic site options. The Council has worked closely with other partners and neighbouring Councils, including Duty to Cooperate, across the West Midlands. Details of studies undertaken and the evidence underpinning the Telford & Wrekin Local Plan are provided on the Council's website³.
6. The Submission Local Plan comprised the Vision & Aims for the Borough, and the Spatial Strategy to guide the direction and location of proposed new development. Policies were organised into chapters for Economy, Housing, the Natural Environment, Community, Connections, the Built Environment & Heritage, and Environmental Resources. The Plan included proposed site allocations for housing.
7. The Examination Hearings were held in public in early 2017 with the last hearing session of the Examination programme completed on 10 February 2017. The Inspector requested that the Council reconsider its Objectively Assessed Housing Need (OAHN) evidence and as a result of this, the Council revised the housing requirement for the Local Plan by applying an OAHN of 864 rather than 502. This is equivalent to an increase of 1,725 dwellings in the housing requirement (17,280 minus the previous planned target of 15,555 dwellings). These additional dwellings will not be allocated in the Plan at this stage. Whilst the total number of dwellings is increased, there is no change to the submitted Spatial or Distribution Strategy; the percentage distribution of

³ http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/1229/telford_and_wrekin_local_plan_2011-2031/2

housing will not change between the 15,555 and 17,280 figures for Telford, Newport and the Rural Areas.

8. The Council carried out further work to address the matters set out in the Inspector's Interim Findings Note (March 2017) to reflect matters discussed at the hearings and addressed in written representations. This resulted in significant changes to the Plan, principally in respect of the objective assessment of housing needs, the overall housing requirement, and the allocation of housing needs. The draft modifications require the Council to progress a Housing Sites Allocations Local Plan to allow the housing sites to be reconsidered and enable a further range of sites to be identified to achieve the housing requirement. Four housing sites were proposed to be deleted from the Plan and the sites to be retained within the TWLP all have an extant planning permission or section 7(1) consent.
9. The Proposed Modifications are mostly concerned with this uplift in housing numbers and the requirement to progress a Sites Allocation Plan rather than allocate housing sites in this TWLP. The Proposed Main Modifications to the TWLP were subject to public consultation during August-September 2017. Responses made were considered by the Inspector. The Planning Inspector's Final Report (November 2017) concluded that the TWLP is sound, subject to the Main Modifications, and could be Adopted.
10. At each stage of the development of the Local Plan, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised and responses prepared have been documented during the development of the TWLP and published on the Council's website and the Online Consultation Portal (Objective).
11. The TWLP sets out the overall Vision for the Borough with Aims & Objectives described for each Local Plan theme: Economy; Housing; Natural Environment; Community; Connections; Built Environment & Heritage; Value Cultural & Heritage Assets; and Environmental Assets. The Spatial Strategy sets out the amount of development required and the distribution of new development, apportioning new development to three distinct parts of the Borough: Telford; Newport; and the Rural Area – and this is supported by four Strategic Policies. Further topic specific Policies guide and provide development management for new development with regard to each of the Plan themes/chapters. The Appendix to the TWLP sets out the framework for delivery and monitoring the effectiveness of the Local Plan, including through the Authority's Monitoring Report, with indicators and targets.

How environmental & sustainability considerations have been integrated into the Telford & Wrekin Local Plan 2011-2031; How the Sustainability/Environmental Report has been taken into account

12. During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Local Plan. The SA was undertaken in accordance with government guidance^{4 5} for a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. This SA is an integrated approach that includes the findings from the Habitats Regulations Assessment (HRA), Health Impact Assessment and the Equalities Impact Assessment (EqIA) - both driven by different legislation and also reported separately. The early SA/SEA work was undertaken by the Council⁶. Since 2015, independent specialist consultants were appointed to carry out the SA providing support for the Council. They worked closely with the plan-making team in an iterative way such that the findings and recommendations from the SA were integrated into each stage of the TWLP. All these later SA & HRA reports are also available on the Council's website⁷.
13. The SA of the TWLP used the same SA Framework developed during the SA scoping process as the basis for assessing the emerging plan - and as explained in Section 2 of the submitted SA Report (June 2016). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during the SA scoping to compile a Framework of Objectives and Decision-Aiding Questions that seek to resolve the sustainability issues identified and relevant to the plan and the area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.
14. The SA considered the likely significant effects of the implementation of the plan on the sustainability objectives for the Telford & Wrekin area. For each aspect of the TWLP, the assessment against the SA Objectives was recorded with a narrative provided describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium and long term, permanent, and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported.

⁴ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁵ <http://www.pas.gov.uk/guidance>

⁶ http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/555/sustainability_appraisal_and_habitat_regulation_assessment

⁷ http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/1229/telford_and_wrekin_local_plan_2011-2031/2

15. The findings and recommendations of the SA informed plan-making and were integrated into the further development of the plan - and as set out in section 5 of the Submitted SA Report (June 2016). Where relevant, the SA made recommendations for mitigating likely negative effects, for example, by suggesting refinements of policy wording. In particular, the findings of the SA guided the selection of potential site allocations by identifying sustainability issues and in particular the cumulative effects of development for wards and sensitive receptors.
16. Arising from discussions at the Examination in early 2017, the Inspector requested that the Council reconsider its Objectively Assessed Housing Need (OAHN) evidence. As a result of this, the Council revised its OAHN with an uplift of 1,725 dwellings but these additional homes will not be allocated in the Plan at this stage. The Spatial Strategy remained the same approach and the Council agreed to prepare a separate Sites Allocations Local Plan to enable the potential sites for allocation to be revisited. These changes and the Proposed Main Modifications to the TWLP arising from the Examination and issues discussed at the Hearings were subject to SA (SA Addendum Report, July 2017) and subject to public consultation. Comments received were taken into consideration by the Inspector in his final report.
19. Generally, the refreshed SA found that the changes to the TWLP indicate that the previous SA remains valid and relevant for most SA Objectives. Positive effects that had been identified, particularly for housing and community objectives, were confirmed. Updated evidence, in particular for water infrastructure, has removed uncertainty and reduced likely significant effects from minor negative to neutral. There is the potential for the higher quantum of development to have negative effects on SA Objectives for services/facilities and other supporting infrastructure, landscape, biodiversity, and the historic environment. However, strong mitigation measures are in place through other TWLP Policies, such that there will be no residual significant negative effects.
21. The SA reports have been available on the Council's website and at each stage, the responses to comments made and issues raised have been reported. Throughout, the appraisals have been proportionate and appropriate to the stages of plan-making. Thus, environmental and sustainability considerations have been integrated and the SA Reports taken into account throughout the plan-making process.

How the results of consultation have been taken into account

22. Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the Local Plan preparation and the SA as follows:

Local Plan Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
Evidence gathering	Draft SA Scoping Report May 2012 Six weeks statutory & public consultation from 21 May to 02 June 2012
Shaping Places Strategy & Options June 2013 Public consultation from 10 June to 26 July 2013	Final SA Scoping Report June 2013 Public consultation from 10 June to 26 July 2013
	Strategy & Options SA Report June 2013 Public consultation from 10 June to 26 July 2013
Proposed Housing and Employment Sites May 2014 Public consultation from 06 May to 17 June 2014	
Draft Local Plan Public consultation from 03 August to 25 September 2015	Draft Local Plan IA Report Public consultation from 03 August to 25 September 2015
Local Plan Publication Version Public consultation from 01 February 2016 to 15 March 2016.	Local Plan IA Report Public consultation from 01 February 2016 to 15 March 2016.
TWLP Submission Version Submitted in June 2016 to be examined by an independent inspector	TWLP IA Report Submitted alongside the Local Plan in June 2016 to be examined by an independent inspector
Examination Early 2017	
Proposed Main Modifications Consultation June – 31 July 2017	SA Addendum Report (July 2017) Consultation June – 31 July 2017
Adoption of Telford & Wrekin Local Plan 2011-2031 November 2017	SA/SEA Adoption Statement November 2017 (this document)

23. SA and consultation responses have been considered in an iterative and ongoing way with the plan-making process and in accordance with the requirements of the SEA Regulations. Representations have been recorded and the responses made to suggestions, issues and concerns raised have been published, including at key statutory stages, as follows:

- Appendix X of Submission SA Report (June 2016) summarises comments received and the Council's responses

All representations to public consultation and comments made through Hearing Statements for the Examination are available to view on the

Council's website⁸. Issues raised on the Submission SA included concern regarding the site allocations. However, these matters were not addressed at this stage as the Council is now going to prepare a separate Sites Allocation Development Plan.

24. Thus, the results of consultation have been taken into account at each stage of plan-making and SA/SEA – in an iterative and ongoing way – responding to issues as they are raised through consultation.
25. Following the examination hearings, the Council prepared a schedule of proposed Main Modifications (MMs) accompanied by an SA Addendum Report to reflect the increased housing requirement and a refresh of supporting evidence. The Inspector has taken into account consultation responses in reaching his final conclusions on the TWLP. Some amendments have been made to the detailed wording of the MMs, including the deletion of one MM. None of the amendments significantly alters the contents of the modifications as published for consultation or undermines the participatory processes and Sustainability Appraisal that has been undertaken⁹. The Inspector concluded that with the recommended MMs, the TWLP satisfies the legal requirements and meets the criteria for soundness. The SA meets with legal requirements.

Reasons for choosing the Telford & Wrekin Local Plan, as adopted, in the light of other reasonable alternatives

26. The SEA Regulations require assessment of the likely significant effects of implementing the plan and "*reasonable alternatives*" taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. Extant SA/SEA guidance advises that the term "*reasonable alternative*" should be taken to mean "*realistic and relevant*" i.e. deliverable and within the timescale of the plan.
27. At each stage of the development of the TWLP, all strategic options and any reasonable alternatives to policy and site allocation proposals have been considered and assessed through SA/SEA. Options for strategic growth and the Spatial Strategy were considered early at the Shaping Places stage in 2013. During 2014, the options for proposed housing and employment sites were investigated through SA – and this work will be built on in the preparation of the new Sites Allocations Local Plan. The findings of the SA and the reasons for progressing or rejecting options were set out in Section 4 of the Submission SA Report (June 2016).
28. The do-nothing scenario is not an option for a local plan as Councils are required to provide for identified development needs; however, this was considered by the SA process and the SA reported that significant negative

⁸http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/1229/telford_and_wrekin_local_plan_2011-2031/2

⁹ The Planning Inspectorate (October 2017) Report on the Examination of the TWLP 2011-2031

effects on environmental factors were likely without a plan and that positive effects for socio-economic factors were less likely to be implemented.

29. Overall, the reasons for choosing the TWLP as adopted include that the adopted plan progresses the Vision, Objectives, and Spatial Strategy for high quality development planning in the TWLP area with the most benefits and the least negative effects for sustainable development.

Measures that are to be taken to monitor the significant sustainability & environmental effects of the implementation of the TWLP

30. The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Authority Monitoring Reports¹⁰ on the progress of Local Plans. Government Guidance on SA/SEA advises a pragmatic approach with shared monitoring for the SA/SEA and the Plan. The TWLP Monitoring Framework includes a wide range of indicators that also relate to the SA Framework. It is considered that these indicators will be sufficient to identify any unforeseen adverse effects at an early stage, and provide information on the predicted effects from the SA. Monitoring of the TWLP will be available to view on the Councils' website.

For further information, please refer to the Council's website:

http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/121/wrekin_local_plan

¹⁰ <https://www.gov.uk/guidance/local-plans--2>