Rotherham local plan

Rotherham Core Strategy

Strategic Environmental Assessment Post Adoption Statement

September 2014

Rotherham
Metropolitan
Borough Council
Where Everyone Matters

Contents

Acronyms and other abbreviations used in this report are listed below.

AMR Annual Monitoring Report
EqIA Equalities Impact Assessment
HIA Health Impact Assessment
HRA Habitats Regulations Assessment
IIA Integrated Impact Assessment
LDF Local Development Framework
SA Sustainability Appraisal
SEA Strategic Environmental Assessment
UDP Unitary Development Plan

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Introduction

1. Rotherham Metropolitan Borough Council adopted the Rotherham Core Strategy on 10 September 2014. This Strategic Environmental Assessment (SEA) Post Adoption Statement has been prepared in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004[1] ('the SEA Regulations'), which requires that on adoption of a plan or programme, a statement setting out the following is published:

   - How the environmental considerations have been integrated into the plan or programme;
   - How the Environmental Report has been taken into account;
   - How opinions expressed during consultation have been taken into account;
   - The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
   - The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

2. In keeping with Section 19 (5) of the Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008[2]), an appraisal of the sustainability of the Core Strategy has been conducted. In accordance with the SEA Regulations, the 'significant effects' of implementing the plan have been included in an Integrated Impact Assessment (IIA) report[3] which reported upon the outcomes of four assessments which informed the development of the Core Strategy. These were:

   - Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which assessed effects of the Core Strategy across a range of environmental, social and socio-economic issues;
   - Health Impact Assessment (HIA) which assessed impacts of the Core Strategy on the health and well-being of the population and ability to access health-related facilities and services. This also addressed equalities issues and thus has had some overlap with an Equalities Impact Assessment;
   - Equalities Impact Assessment (EqIA) which assessed the impacts of the Core Strategy on equalities issues, in particular disadvantaged or excluded groups of people. EqIA helps identify where we can best promote equality of opportunity; and
   - Habitats Regulations Assessment (HRA) Screening which assessed the potential for the Core Strategy to significantly affect a European nature conservation site, and determined whether or not there was a need for a full Appropriate Assessment.

3. The IIA identified social and economic effects alongside the environmental effects required by SEA. The IIA Report is the equivalent of an SA Report, and has been concurrent with the preparation of the Core Strategy. SA incorporates the requirements of SEA in accordance with European Directive 2001/42/EC[4] and the SEA Regulations, and removes the need to carry out a separate SEA. As a result, the IIA of the Core Strategy satisfies the relevant regulations and legislation.

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[1] http://www.legislation.gov.uk/uksi/2004/1633/made
[2] http://www.legislation.gov.uk/ukpga/2008/29/contents
[3] Integrated Impact Assessment of the Core Strategy. Submission Version of the Core Strategy (June 2013) & Addendum 1 Assessment of Main Modifications (May 2014)
[4] Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment. See: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042

4. For ease of reference, references in this report to SA also refer to the IIA produced from 2011 onwards. Full references to specific reports are provided in footnotes where relevant.

Background

5. The Core Strategy forms part of Rotherham's Local Plan and sets out the 'spatial' strategy for the whole Borough and identifies the broad locations for delivering new housing and employment, including provision for retail, leisure and community facilities. It also sets out the strategic policies and the required new infrastructure to make all this happen over the Plan period of 2013 - 2028.

6. SA has been undertaken as an iterative process throughout the development of the Core Strategy, as the table below summarises:

Table 1: Core Strategy Preparation and Sustainability Appraisal Process

Core Strategy Development	SA / IIA Stage	Timeline
-	Sustainability Appraisal General Scoping Report	2006
Core Strategy Objectives	Compatibility Appraisal with the SA Objectives	Late 2006 – 2009
Three Strategic Options / Scenarios	Assessment Against the Baseline	2006
Nine Policy Directions		
Core Strategy Preferred Options Report	SA Report (by Arup)	January 2007
Urban Extension Options	Assessment Against Growth Scenarios	2009
Three Options for Growth, Employment Land Strategy, Rotherham Town Centre Spatial Options	Assessment Against the Baseline	2009
Core Strategy Revised Options Report	SA Report (by WSP)	May 2009
-	Sustainability Appraisal General Scoping Report - Update	May 2011
Revised Urban Extension Options	Assessment Against the Baseline	2011
Draft Policies		
Final Draft Core Strategy	IIA Report (by Jacobs)	May 2011
Schedule of Changes	Comparison with the Final Draft Core Strategy, Assessment of Material Changes Against Previous Predictions or Against the Baseline (as appropriate)	2012
Publication Draft Core Strategy	Addendum 1 to the IIA Report (to be read alongside the May 2011 IIA Report)	May 2012
Focused Changes to the Publication Core Strategy	None (There were no changes significant to the SA, and therefore no assessment was necessary.)	January 2013
Submission Version of the Core Strategy	IIA Report (by Jacobs) (Included review of Focused Changes)	June 2013
Core Strategy Proposed Main Modifications	Addendum 1 to the IIA Report – Submission Version of the Core Strategy (June 2013) (by Jacobs)	February 2014 (with post consultation update in May 2014)
Adopted Core Strategy	SEA Adoption Statement (by RMBC)	August 2014

7. Prior to submission of the Core Strategy, consultation provided the public and statutory bodies with an opportunity to comment on the Core Strategy and associated SA / IIA reports during the Preferred Options (2007), Revised Options (2009), Final Draft (2011), and Publication (2012) stages. Consultation on the Focused Changes

document took place in January 2013, and while these did not alter the SA / IIA outcomes, an assessment of the Focused Changes was set out in the Submission Version IIA report (June 2013).

8. The Council's Core Strategy and accompanying SA[5] were submitted to Government for examination in June 2013. Richard Hollox was appointed as the Inspector to conduct the independent examination into the soundness of the Core Strategy.

9. Following the hearing sessions of the Core Strategy public examination, the Council consulted on the Inspector's draft Main Modifications to the Core Strategy. An addendum to the IIA Report was published alongside this consultation, which occurred in March and April 2014.

10. The Council received the Inspector's Final Report on 30 June 2014, which included the final Main Modifications. Paragraph 4 notes that they do not entail any substantive amendments to the draft Main Modifications that would undermine the participatory processes or the SA that underpinned them[6].

Integrating environmental & sustainability considerations into the Core Strategy

11. As shown in the table above, Sustainability Appraisal has been carried as an iterative process throughout preparation of the Core Strategy. This has allowed reasonable alternatives for achieving the plan's objectives to be assessed for their sustainability effects, and ensured that the wording (as reflective of requirements, provisions and aspirations for development) of policies as far as possible seeks to minimise any negative sustainability impacts and maximise any opportunities to deliver the sustainability objectives.

12. Rotherham's approach applies the SA / IIA Framework (a set of environmental, social and economic objectives for the borough), originally developed in 2006, as a guiding tool. However the assessment under each Topic (from 2011 onwards) is conducted against the baseline. The process has identified the risk that a significant effect or impact might occur, and the control mechanisms in place to avoid, reduce, or offset the potential impacts of those risks. It also identifies the opportunities for beneficial impacts, and the proposals which may enhance those benefits.

13. This is particularly appropriate to the Core Strategy, which has developed alongside the SA / IIA process, and has incorporated within its policies ways of mitigating risks and taking advantage of opportunities. The SA / IIA includes an assessment of the potential significant effects as a result of any remaining risks and opportunities with mitigation in place.

14. Stakeholders, including statutory consultees, were given opportunities to comment at each stage of plan production. Any views expressed were used to guide and inform the Sustainability Appraisal and plan preparation process. The development of the Core Strategy and the accompanying SA / IIA has therefore been an iterative and inclusive process.

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[5] Integrated Impact Assessment (IIA) of the Core Strategy: IIA Report – Submission Version of the Core Strategy, June 2013
[6] Report on the Examination into the Publication Rotherham Core Strategy 2013-2028 (June 2012) Local Plan. June 30 2014.

How the Environmental Report has been taken into account

15. The SA / IIA process has contributed to the development and refinement of the Core Strategy by providing an assessment of the proposed options and policies throughout the plan preparation process.

16. Each SA and IIA report demonstrates how the sustainability objectives have been taken into account at each stage and integrated into the Core Strategy. They provide an assessment of the alternative options considered. Policies have also been assessed and recommendations regarding mitigation and monitoring have been provided. These recommendations have been taken into account throughout preparation of the Core Strategy.

17. For example the 2007 SA report made a number of recommendations regarding policy directions, many of which have informed further drafting of the Core Strategy, including:
    - Reference to Sustainable Design
    - Encouraging innovative approaches to working and employment
    - Influence the public realm and create areas and spaces that give residents pride in their community and enhance community cohesion
    - Promote the use of biodiversity and the wider environment to respond to the effects of climate change

18. The 2009 revised options SA also made some generic policy recommendations. These have been considered and where appropriate have been included within the policies of the Core Strategy and the emerging Sites and Policies document. Some of the key points included that policy should:
    - prioritise housing in sustainable locations with good walking and cycling access to public transport and local services, with Rotherham town centre at the heart of the borough and clear roles for other local centres;
    - ensure new development looks to provide sustainability infrastructure, including footpaths, cycle paths and any services and facilities needed;
    - take account of the Landscape Character Assessment in choosing any sites taken out of the Green Belt, and in considering the scale and location of new development;
    - make reference to sustainable construction standards (e.g. Code for Sustainable Homes and BREEAM);
    - use the potential for new development to reduce deprivation in the areas in which it is being proposed, such as by refurbishing areas of poorer housing;
    - refer to Natural England's Accessible Natural Greenspace Standard (ANGSt); and
    - seek net enhancements to biodiversity and the landscape, such as by contributing to wildlife corridors and Local Biodiversity Action Plan (LBAP) habitats.

19. The 2013 IIA identified key recommendations and how they have been addressed in the Core Strategy.

Table 2: 2013 Submission IIA Recommendations

Key IIA Recommendations	How Addressed by the Local Plan
Incorporate access for disabled people and meeting the needs of those with mobility issues into policy.	This is covered by other legislation and will therefore not be covered by a specific Local Plan policy; however the issue will be addressed in the emerging Sites and Policies document.

Key IIA Recommendations	How Addressed by the Local Plan
Escalate the transfer of freight to rail and canal as the priority over strategic road development in Policy CS18.	Not considered feasible. Whilst this might be a long-term aspiration of the Local Plan, it is not realistic to achieve the infrastructure improvements required to ignore other modes of transport.
Policy CS13 could aim to increase and improve health facilities in Rotherham Town Centre.	This has been incorporated into Core Strategy policy.
Place additional emphasis on 'secured by design' principles within policy	This has been incorporated into Core Strategy policy.
Incorporate the protection and enhancement of water quality into Policy CS24.	This has been incorporated into Core Strategy policy.
Policy on sustainable design should address efficient use of natural resources including waste, soil, minerals, aggregates, energy, water, land (including high-quality agricultural land) and other raw materials. This should at least be mentioned, even if mainly addressed by other local development documents.	This is either already covered by the proposed Core Strategy policies or supporting text, or by further additions which have been made to Policy CS28 to ensure it better addresses the wide range of sustainable design considerations.
Policy on sustainable design should address waste management, such as incorporation of waste segregation and collection facilities into design.	This has been incorporated into the supporting text of Policy CS28, and Policy CS28 itself mentions the provision of sustainable waste management. Consideration is also being given to incorporating these issues into the Sites and Policies document. It is noted that the South Yorkshire Residential Design Guide (which we may adopt as an SPD) has a section (N3.7) that deals specifically with waste recycling and collection. Better Places to Work (currently Best Practice Guidance, 2002) has a section (5.7) which talks about waste stores as an integral design feature.
There should be a policy which requires detailed Agricultural Land Classification assessment of sites in Grade 2 or 3 agricultural land, to inform development and minimise the loss of 'best and most versatile' soils (Grades 1, 2 and 3a).	Consideration of Agricultural Land Classification has been taken into account in the consideration of new sites for development. The issue has been incorporated into Core Strategy Policy CS20. Any requirement for detailed study will be considered for inclusion within the emerging Sites and Policies document.
Policy CS20 could be enhanced to include protection of designated geological sites in Rotherham.	Part b of this policy is already considered to cover geological sites therefore the supporting text has been amended to make this clear.
The requirement for detailed masterplanning under Policy CS2 could be enhanced by requiring that such master plans demonstrate high-quality engagement with the public and that local community views and comments have been taken into account. Such master plans could be adopted as SPDs within Rotherham's Local Plan, and subjected to Sustainability Appraisal and Strategic Environmental Assessment in accordance with legislation (as well as HIA and EqIA if desired). This would improve community engagement, address this IIA's residual risks and conclusions, and help ensure consistency with the Core Strategy.	This has been incorporated into Policy CS2, which includes an expectation of appropriate community engagement in support of master plans. Further consideration is being given to taking forward the preparation of master plans to guide future development opportunities in the broad locations and on other large sites. Consideration is also being given to developing an appropriate policy to cover this issue in greater detail in the preparation of the Sites and Policies document. Whilst SA, HIA and EqIA are not always a statutory requirement in the preparation of an SPD, consideration will be given to the need to undertake this work.
It would be valuable for Policy CS27 to require developers to adhere to 'secured by design' principles.	Consideration has been given to this matter and reference has been made in Policy CS28.
Policies on accessibility and provision of community facilities should be enhanced by future DPDs and SPDs to specify improved accessibility for the Gypsy and Traveller community to local services and facilities. It should be clarified how	Consideration is being given to taking this forward through the preparation of further local development documents, including the preparation of appropriate policies to be included within the emerging Sites and Policies document.

Key IIA Recommendations	How Addressed by the Local Plan
this might be viable and achievable, such as whether a borough-wide developer contribution is appropriate, or if their needs must be linked to specific locations for development.	
The future implementation of Policies CS27, CS29 and CS32, such as through future, more detailed policy in DPDs or SPDs, can be more specific about the types of community services and facilities which Rotherham needs, including (as applicable) midwifery care, mental health services, health visiting services and possibly baby-changing or breast-feeding facilities in town and local centres. These detailed requirements should be developed in consultation with various stakeholders, including the NHS and the public. Reference should be made to Rotherham's performance indicators for maternity and pregnancy.	Consideration is being given to researching this issue further to determine the spatial implications of the proposals and to consider how appropriate it is to reference and manage this issue, within any future local development documents.
Policy CS32 could require that the needs of neighbouring communities should be considered, with the aim of increasing equality more widely in the area. This could apply to transport infrastructure, as well as to greenspace, green infrastructure and any new services and facilities.	An Infrastructure Delivery Plan has been prepared, and a Community Infrastructure Levy Charging Schedule is currently being progressed through consultation. The appropriateness of any future developer contributions to delivering infrastructure will be assessed on a case-by-case basis. Developer contributions are sought at the planning application stage to meet the needs arising from any new development or to compensate for any adverse impact of the development on local amenity or resource. Further preparation of the policy will be informed by an assessment of existing capacity and demand for new infrastructure within local communities.
The Core Strategy could include in policy (such as Policy CS7 or CS28 on sustainable design) reference to housing meeting the needs of people throughout their lifetimes. This can then be further elaborated upon by future DPDs and SPDs.	Within the reasoned justification to Policy CS28, reference has been made to requiring a proportion of new homes to be built to Lifetime Homes standards. Consideration will be given as to whether there is a need to further elaborate on this policy and to including further policies in any future Sites and Policies document or other local development documents.

20.   The May 2014 addendum to the 2013 submission IIA, which assessed the Inspector's proposed Main Modifications, also identified a number of recommendations. These, along with how they will be addressed (in light of the Inspector's final report and Main Modifications), are set out below:

Table 3: May 2014 IIA Addendum recommendations

IIA recommendation	How this will be addressed
To enable delivery of the higher housing requirement in a planned way to meet the needs of the Borough and reduce the impact of new development on existing infrastructure, the Integrated Impact Assessment recommends that either: a) the phasing policy is retained; or b) that the higher housing requirement is distributed over the 15-year Plan period. These approaches will enable delivery of infrastructure at appropriate times to meet the needs of new development.	The Inspector's final Main Modifications (included with his report) support a housing requirement which is in line with that proposed by the Council in its submission Core Strategy (rather than the higher requirement identified in the draft Main Modifications) and also distributes the identified housing backlog between 2008 and 2013 over the 15 year Plan Period.

IIA recommendation	How this will be addressed
A refreshed Infrastructure Delivery Study will be required to ensure that there are no barriers to growth relative to the revised targets and the timing of delivery. In terms of the timing of the refreshed study: a) If the 2004/05 – 2012/13 shortfall/backlog of housing is to be met within the first five years of the Plan period, this should be undertaken immediately, alongside SA / SEA; b) If the 2004/05 – 2012/13 shortfall/backlog of housing is to be distributed across the Plan period, then this should be considered at the earliest practicable opportunity, also alongside SA/SEA. This will be particularly important if the SHMA (due by early 2015) identifies a further increase to the housing target or a significant change in the distribution growth.	The Infrastructure Delivery Study is intended to be a living document. In light of the Inspector's Main Modification which distributes housing backlog over the Plan Period further consideration will be given to refreshing the Study following conclusion of the current work to produce an up to date Strategic Housing Market Assessment (SHMA).

21. Overall, this process has supported decision-making regarding:
    - The selection of the most appropriate options at each stage;
    - The revision of options where necessary; and
    - The establishment of mitigation measures to address certain potentially negative effects and achieve the most sustainable outcome.

22. The SA / IIA process, including identification of environmental baseline and key issues has assisted in the identification of constraints and allowed the Council to develop policies and proposals which avoid impacts on these constraints or identify appropriate mitigation measures.

23. The final IIA Report[7] has concluded that in the majority, the Core Strategy policies are capable of addressing all risks of negative sustainability impacts, and achieving net benefits. Section 21.2 of the IIA Report summarises the improvements made to the Core Strategy as a result of IIA recommendations.

How consultation responses have been taken into account

24. A key component of the Core Strategy preparation and SA/SEA process is consultation with stakeholders.

25. Throughout its preparation, the Core Strategy has been subject to consultation in line with the adopted Statement of Community Involvement[8] and relevant Regulations (primarily The Town and Country Planning (Local Development) (England) Regulations 2004, (as amended), and subsequently The Town and Country Planning (Local Planning) (England) Regulations 2012[9]).

26. The Council has also complied with the requirements of the SEA Regulations (Regulation 12[6]), which require a set period for statutory consultation on the scope and level of detail of the SEA, and effective opportunity for the public and statutory consultees to express their opinions on the results of the SEA. Throughout the process of carrying out the SA / IIA, three statutory consultation bodies are required to be consulted – the Environment Agency, English Heritage and Natural England.

27. The Council has sought to address issues raised through the consultation exercises and to reflect those concerns in the content and wording of the Core Strategy.

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[7] Integrated Impact Assessment (IIA) of the Core Strategy: IIA Report – Submission Version of the Core Strategy, June 2013 & Addendum 1 to the IIA Report - Submission Version of the Core Strategy (June 2013): Assessment of Main Modifications. May 2014
[8] Statement of Community Involvement, Adopted June 2006
[9] http://www.legislation.gov.uk/uksi/2012/767/contents/made

Changes have been made up to and following the independent examination to take account of comments received and the Inspector's recommendations.

Scoping Reports

28. The General Scoping Report produced in 2006[10] set the scope of the Sustainability Appraisal for those Local Development Documents which require it. It was subject to statutory consultation for a five-week period ending 13 January 2006. The Council consulted the Countryside Agency, Environment Agency, English Nature and English Heritage. However, the Council also broadened this statutory consultation and sought comment from any other interested bodies and individuals. A Feedback Report was produced following consultation[11]. Comments received were taken into account and the scope of the SA amended as appropriate, including:
    - The inclusion of additional sustainability issues
    - New decision guiding and making prompts and accompanying indicators
    - Amendments to SA objectives
    - Taking account of additional plans, policies and guidance

29. Due to the period of time since the Scoping Report was created, it was updated in 2011[12]. It was again consulted upon for a statutory five-week period in February and March 2011. This included current statutory consultees (the Environment Agency, English Heritage and Natural England, following the merger of English Nature and the Countryside Agency), as well as other interested bodies and individuals. Amendments included updates to the baseline situation and the context review to incorporate new and updated information since 2006. The Sustainability Appraisal framework was also refreshed; however, the fundamental elements of the original framework were retained, which also retained consistency with previous stages of assessment.

Core Strategy Preferred Options 2007

30. A Sustainability Appraisal Report[13] was issued for public consultation alongside the Core Strategy Preferred Options Report between 5 February and 23 March 2007. Comments received are outlined in the consultation Feedback Report[14]. They were taken into account by both the SA and Council Planning Policy Team, and reflected in further SA and Core Strategy preparation work, including:
    - Updated references to policies and additional documents
    - Consideration of amendment to objectives
    - Consideration of reference to requirements for integrated design of all three economic, social and environmental aspects of sustainable development
    - Strengthen intended references to the importance of non-designated heritage assets

Core Strategy Revised Options Report 2009

31. A Sustainability Appraisal Report[15] was issued for public consultation alongside the Core Strategy Revised Options Report between 29 May and 31 August 2009.

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[10] Sustainability Appraisal of Rotherham's Local Development Framework: General Scoping Report, 2006
[11] Rotherham Borough Council Response to General Scoping Report Consultation, 2006
[12] Sustainability Appraisal of Rotherham's Local Development Framework, General Scoping Report – Update, May 2011
[13] Rotherham Borough Local Development Framework – Core Strategy: Sustainability Appraisal Report, January 2007
[14] Core Strategy Preferred Options: Feedback of Consultation. Annex 3 Summary of Sustainability Appraisal Responses & the Council's Appraisal, September 2007
[15] Sustainability Appraisal (SA) of Core Strategy Revised Options, May 2009

32. Comments received are outlined in the Revised Options Final Feedback Report 2010[16]. Detailed comments and Council responses are also available through our online consultation website: http://rotherham.limehouse.co.uk/portal/planning/cs/csro/csro

33. Comments received were again taken into account by both the SA and Council Planning Policy Team, and reflected in further SA and Core Strategy preparation work, including:
     - Updated references to policies and additional documents
     - Need to undertake further Sustainability Appraisal work to ensure that it has considered all possible alternatives for urban extensions
     - Further work is to be undertaken to enhance the biodiversity evidence base
     - Consideration of SA scoring in relation to some objectives

Draft Core Strategy 2011

34. An Integrated Impact Assessment Report[17], incorporating SA, SEA, HIA, EqIA and HRA was issued for public consultation alongside the Draft Core Strategy between 4 July and 16 September 2011. Comments received are outlined in a Feedback Report produced in 2012[18]. Detailed comments and Council responses are also available through our online consultation website: http://rotherham.limehouse.co.uk/portal/planning/cs/draft_core_strategy/finaldraftcorestrategy

35. Comments received were taken into account by both the IIA and Council Planning Policy Team, and reflected in further IIA and Core Strategy preparation work, including:
     - Amended assessment of Bassingthorpe Farm as regards potential impact on Wentworth Woodhouse
     - Undertaking a Green Belt review

Publication Draft Core Strategy 2012

36. An Addendum to the 2011 IIA Report[19] was issued for public consultation alongside the Publication Core Strategy between 25 June and 6 August 2012. Detailed comments and Council responses are available through our online consultation website: http://rotherham.limehouse.co.uk/portal/planning/cs/publication_cs/publication_core_strategy

37. Comments received were taken into account by both the IIA and Council Planning Policy Team, and reflected in further IIA and Core Strategy preparation work, including:
     - a Landscape Visual Impact Assessment and a Heritage Impact Assessment undertaken in relation to Bassingthorpe Farm

Focused Changes to the Publication Core Strategy, Submission of Core Strategy and consultation on proposed Main Modifications

38. The Council undertook consultation on Focused Changes to the Core Strategy between 14 January and 25 February 2013. The proposed changes were submitted alongside the Publication Core Strategy for independent examination in June 2013. An

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[16] Core Strategy Revised Options. Final Feedback Report, March 2010
[17] Rotherham Metropolitan Borough Council's LDF Draft Core Strategy: Integrated Impact Assessment (IIA) Report, May 2011
[18] Draft Core Strategy and Sites and Policies Issues and Options Consultation: Feedback Report, January 2012
[19] Rotherham Metropolitan Borough Council's LDF Core Strategy: Integrated Impact Assessment (IIA) Report Addendum 1: IIA of Proposed Changes, May 2012

IIA Report[20], incorporating SA/SEA, was submitted alongside the Core Strategy which took account of the Focused Changes.

39. Representations received at the Publication and Focused Changes stages were submitted for consideration by the Inspector appointed to examine the Core Strategy in line with the Regulations[21].

40. Following the hearing sessions, the Council consulted on the Inspector's proposed Main Modifications to the Core Strategy. These Main Modifications were accompanied by an Addendum to the IIA Report which included an assessment of their potential environmental effects and impact on the previous IIA. In response to concerns from Natural England that this Addendum did not address HRA, a post-consultation update was produced which clarified that an Appropriate Assessment is not required as a result of the Main Modifications to the Core Strategy. In a letter of response (dated 29 May 2014), Natural England confirmed that they are satisfied that the IIA complies with the requirements of the Habitats Regulations, and that the modifications to the Core Strategy are unlikely to significantly affect an internationally protected nature conservation site.

41. The Inspector took full account of representations made upon the draft Main Modifications. His final report contains the final modifications recommended.

42. In summary, the Council has satisfied the relevant legislation in terms of consultation on its Core Strategy and associated IIA, incorporating SA / SEA. This has ensured that consultation responses have helped shape the Core Strategy to ensure the most sustainable outcomes.

43. Rotherham is a land-locked borough and the nature of the activities proposed in the Core Strategy mean that consultation with other EU member states was not appropriate during its preparation. As such, the requirement at paragraph 4(d) of Regulation 16 of the SEA Regulations regarding consultations entered into with other EU members is not relevant.

Reasons for choosing the final version of the Core Strategy (in light of other reasonable alternatives)

44. Regulation 12(2) of the SEA Regulations requires environmental reports (SA / SEA) to consider any reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.

45. The early development of the Core Strategy (2006 / 2007) began with considering three broad approaches to development in the borough:
   - Option A: Responding to Market Forces;
   - Option B: Matching Needs with Opportunities; and
   - Option C: Managing the Environment as a Key Resource.

46. They were created under the requirement that they had to be broadly within the context of current planning and environmental policy and legislation. Therefore, extreme approaches were not considered. A fourth baseline or 'do minimum' option, based upon the existing Unitary Development Plan (UDP), was included in the

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[20] Rotherham Metropolitan Borough Council's Local Plan: Integrated Impact Assessment (IIA) of the Core Strategy. IIA Report – Submission Version of the Core Strategy, June 2013
[21] http://www.legislation.gov.uk/uksi/2012/767/contents/made

Sustainability Appraisal accompanying the Preferred Options consultation[22] to allow comparisons between the likely future baseline conditions with the proposed options.

47. Sustainability Appraisal identified that although some aspects of option A performed well, overall it could result in a significant negative long term impact. It noted that without any environmental and social safeguards the medium to long term effects could be significantly adverse. Option B was not identified as having any negative long term scores (although a number of uncertain impacts were identified) and would have a significant positive long term impact. Option C was identified as having a significant positive long term impact, although marginally poorer than Option B, with identification of some long term negative impacts.

48. The final outcome of the sustainability appraisal assessment was the identification of the most sustainable option for achieving each of the SA Objectives. In some cases one of the options was clearly the most sustainable of the three being assessed. However in other cases two or all of the options provided the most sustainable option. In these situations the potential for hybrid options were highlighted.

49. The preferred Strategic Option was not a clear-cut selection of any one single option. Instead, combinations of options were used to inform the Council's approach to sustainability under different topics. However, it is worth noting that, as identified above, Option B performed best overall, and was selected for addressing many of the Core Strategy's policy directions.

50. In 2007, Policy Directions were assessed against the SA Objectives in the Sustainability Appraisal report[23]. This identified a number of recommendations. These have been considered and where appropriate have been included within the policies of the Core Strategy and the emerging Sites and Policies document.

51. The 2009 SA Report[24] included an assessment of three options for growth. These were:
    - Baseline – Current RSS Policy;
    - Option 1 – Urban Extensions and more Principal Towns;
    - Option 2 – Development in Public Transport Corridors; and
    - Option 3 – Dispersed Development.

52. The baseline option was not considered a 'reasonable alternative' as it did not meet the RSS housing target (prior to revocation of the regional strategy). Option 1 was identified as helping strengthen the role and vibrancy of town and key district centres and having a beneficial impact on the local economy and employment. This option has more potential than the baseline position to tackle some of the pockets of deprivation throughout the Borough, but to a lesser extent under Options 2 and 3. It would be less likely to encourage cycling, walking and public transport use across the Borough and as such miss opportunities to encourage healthier lifestyles, minimise resource consumption and improve air quality.

53. Option 2 provides the optimum balance in terms of achieving the most development without compromising as many major reservation sites and still concentrating

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[22] Rotherham Borough Local Development Framework – Core Strategy: Sustainability Appraisal Report, January 2007
[23] Rotherham Borough Local Development Framework – Core Strategy: Sustainability Appraisal Report, January 2007
[24] Sustainability Appraisal (SA) of Core Strategy Revised Options, May 2009

development in the most sustainable settlements. It would help meet rural housing needs and improve service provision to smaller villages within catchment areas of larger rural settlements. The higher rates of development would also have a greater potential to adversely impact landscape value, particularly towards the East of Dinnington and townscape character in all locations.

54. Option 3 gives greater opportunity for the provision of housing, jobs and services in both the urban and rural areas of the Borough, and reduces the potential pressures on land around the urban fringe and therefore environmental impacts. It would however, put more pressure on those rural areas that would otherwise remain undeveloped. It may also give rise to greater car dependency raising carbon emissions if insufficient investment became available for public transport. The higher rates of development could do more to meet the need for more affordable housing, but for obvious reasons, would result in the loss of more Greenfield land and Green belt. The higher rates of development would also have a greater potential to adversely impact landscape and townscape character.

55. Option 2 was the preferred option selected, and taken forward into the further development of the Core Strategy.

56. In 2009, the development of the Core Strategy also considered options for possible Urban Extensions within the borough. Six locations were assessed in the SA report against the baseline and growth options above.

57. Three Town Centre Spatial Options were also assessed to help identify a preferred approach to defining Rotherham Town Centre and to retail and related development within it. The options were:
   - Option 1 – Consolidation (current UDP option);
   - Option 2 – Expansion; and
   - Option 3 – Contraction / Dual Node with Parkgate Shopping.

58. The Sustainability Appraisal identified that Option 1 is likely to provide a clear, focussed and better resourced role for the town centre. This will add to its overall sustainability and vitality and should help ensure that planned growth in other larger centres in the Borough. Benefits gained under Option 1 are likely to be less concentrated under Option 2, and a more dispersed approach may lead to the loss of key community facilities. Option 2 may see more development in areas of flood risk, and Option 3 will require significant resourcing in terms of transport provision and infrastructure linking Parkgate shopping into the town and minimising congestion. Option 2 and 3 may lead to a town centre that promotes a night time economy (dining and socialising) with less passing trade during the daytime to the detriment of existing retailers and businesses as well as future investment. This may also discourage town centre living and increase fear of crime and anti-social behaviour.

59. The overall conclusion was that Option 1 is favoured in SA terms, and would be strengthened in combination with other initiatives for the town centre. Option 1 was expected to provide a clear, focused and better resourced role for the town centre, assisting long-term vitality.

60. The submitted Core Strategy however supports a sustainable extension to Rotherham town centre, taking account of later evidence base in terms of retail floorspace to be planned for. Focusing development on Rotherham Town Centre was reflected in draft

policies which the 2011 IIA[25] concluded were, in the majority, capable of addressing all risks of negative sustainability impacts, and achieving net benefits.

61. Following consultation on the 'Urban Extension' options in 2009, the Council undertook further work regarding where new growth in Rotherham should take place. The assessment of a wider breadth of feasible options was undertaken, with the IIA setting out the results, highlighting areas which could be avoided to reduce risk (and reliance on mitigation), and general recommendations on the scale of development and infrastructure requirements.

62. Appendix D of the 2013 IIA[26] (which accompanied submission of the Core Strategy for examination) provides an in-depth discussion of the selection of preferred Broad Locations for Growth, providing the rationale behind the decision to identify Bassingthorpe Farm and Dinnington East as broad locations for growth.

63. 11 alternatives were considered, and whilst the IIA concluded that all of the alternative broad locations for growth were potentially viable options, in planning terms, not all of them would respect and support the spatial strategy and settlement hierarchy.

64. Bassingthorpe Farm has been preferred in view of Rotherham urban area's position in the settlement hierarchy and its proximity to existing services, facilities and local employment opportunities offered by Rotherham Town Centre and the inner urban area. It provides an opportunity for the provision of new social and community infrastructure in the locality. It will provide opportunities for tackling deprivation within the inner urban area and will provide a diversified housing offer and more affordable housing opportunities. It also promotes the release of land for employment purposes, thus contributing to its inherent sustainability and reducing the need to travel.

65. Dinnington East has been preferred in view of Dinnington's position in the settlement hierarchy and number of dwellings still required. Secondly, it better integrates with existing residential areas and has greater connectivity to Dinnington Town Centre than the Dinnington West option. Given its proximity to areas of deprivation in the east of Dinnington this option provides opportunities for tackling deprivation, enhancing and diversifying the housing offer and providing more affordable housing opportunities. Furthermore, development to the east would provide better links to the Dinnington Transport Interchange and onwards to employment opportunities further afield.

66. The other alternatives were not taken forward as urban extensions for a number of reasons, including:
   - Constraints which limited deliverabiity / capacity for development (for example, topography, heritage, landfill, highway access and biodiversity interests)
   - Remoteness from Rotherham Town Centre and / or other services, facilities and employment opportunities
   - Connectivity to existing residential areas
   - remoteness from existing public transport networks.
   - Position of the site in relation to the settlement's location in the hierarchy
   - The need for development sites within particular settlements
   - Regeneration benefits

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[25] Rotherham Metropolitan Borough Council's LDF Draft Core Strategy: Integrated Impact Assessment (IIA) Report, May 2011
[26] Rotherham Metropolitan Borough Council's Local Plan: Integrated Impact Assessment (IIA) of the Core Strategy. IIA Report – Submission Version of the Core Strategy, June 2013

67. The Inspector's draft Main Modifications included a higher housing target and the identification of Bassingthorpe Farm as a Strategic Allocation rather than a Broad Location for Growth. The addendum to the 2013 IIA[27] assessed the Main Modifications and identified an increase in risks of negative effects presented by the up-front delivery of homes in the first 5 years of the plan period to address housing backlog against previous targets. It noted that should such negative effects occur in the short term, it would likely take the borough until the middle of the plan period (medium term) to fully implement the mitigation required to offset or compensate for such effects.

68. The Inspector took full account of representations made upon the draft Main Modifications. His final report concluded that the housing requirement as originally submitted for examination was broadly correct, rather than a higher requirement. It also indicated that the housing backlog should be spread over the plan period rather than dealt with in the first five years.

69. SA / IIA has informed the Spatial Strategy, which comprises a Settlement Hierarchy and targets for each settlement. The key social, economic and environmental features and constraints of different areas have been considered, and the key issues and outputs of this process are discussed in the 2013 IIA Report accompanying Core Strategy submission.

70. The SA and IIA process has assessed the effects of the entire Core Strategy (growth targets, strategic allocation, broad locations for growth, settlement hierarchy and all policies and reasonable alternatives) on a range of topics. This has highlighted potential negative effects (risks) and opportunities for beneficial effects and recommendations to improve the Core Strategy.

71. Each report in the SA and IIA process demonstrates how sustainability objectives have been taken into account at each stage, and integrated into the development of the Core Strategy. Overall the IIA concludes that in the majority, the Core Strategy policies are capable of addressing all risks of negative sustainability impacts, and achieving net benefits.

Measures to monitor the significant environmental effects of the Core Strategy

72. The Core Strategy will be subject to an ongoing programme of monitoring. It contains a Monitoring and Implementation chapter which sets out how this will be undertaken to measure the effectiveness of the Core Strategy against a broad range of indicators and targets. This process will allow a consideration of whether any changes to the Core Strategy are required if a policy is not working or if the targets are not being met.

73. Monitoring outcomes are normally reported through the Council's Annual Monitoring Report (AMR). This will identify any objectives and targets that are not being met and any action to rectify the situation. The Annual Monitoring Reports will be published on the Council's website.

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[27] Addendum 1 to the IIA Report - Submission Version of the Core Strategy (June 2013): Assessment of Main Modifications. May 2014