



# **Rotherham Local Plan: Sites and Policies Document**

Rotherham Metropolitan Borough Council

**Integrated Impact Assessment (IIA) Report 2015** 

**Volume 1: Background to the IIA** 

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### **Preamble – Post-Publication Errata**

Upon publication of the IIA Report, certain errors were noted and have been corrected in Volumes 2 and 3 of the IIA Report. Since 28<sup>th</sup> September 2015, only the list of acronyms and abbreviations has been updated in Volume 1.

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# **Acronyms and Abbreviations**

The following acronyms and abbreviations have been used multiple times in this volume (Volume 1) of the IIA Report for the Sites and Policies document.

Acronym / Abbreviation	Full Term
ANGSt	Accessible Natural Greenspace Standard
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
ВМЕ	Black and Minority Ethnic
BRT	Bus Rapid Transit
CAMS	Catchment Abstraction Management Strategy
CO <sub>2</sub> / CO <sub>2</sub> e	carbon dioxide / carbon dioxide equivalents – generally, references to CO <sub>2</sub> (the commonly understood term) actually mean CO <sub>2</sub> e, which is the amount of greenhouse gases in total (including other types of greenhouse gas such as methane, nitrogen dioxide and sulphur hexafluoride) as converted to the equivalent amount of CO <sub>2</sub> (in terms of global warming potential)
DH	Department of Health
DPD	Development Plan Document – reference relating to the former LDF system (see below)
EqIA	Equalities Impact Assessment
GIS	Geographic Information System
HIA	Health Impact Assessment
HMSO	Her Majesty's Stationery Office (reference to UK Government legislation)
HRA	Habitats Regulations Assessment
HS2	High Speed 2
IIA	Integrated Impact Assessment
IMD	Index of Multiple Deprivation
LCA	Landscape Character Assessment / Area
LDF	Local Development Framework – the predecessor to local plans, now superseded by current planning legislation
LNR	Local Nature Reserve

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Acronym / Abbreviation	Full Term
LTP	Local Transport Plan
LWS	Local Wildlife Site
NHS	National Health Service
NO <sub>2</sub>	nitrogen dioxide
NPPF	National Planning Policy Framework
NVQ	National Vocational Qualification
ONS	Office for National Statistics
PAS	Planning Advisory Services
PCT	Primary Care Trust
RIGS	Regionally Important Geological (and Geomorphological) Site
RMBC	Rotherham Metropolitan Borough Council
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation – a site of international nature conservation importance
SEA	Strategic Environment Assessment
SHLAA	Strategic Housing Land Availability Assessment
SPA	Special Protection Area – a site of international nature conservation importance
SPD	Supplementary Planning Document – reference relating to the former LDF system (see above)
SSSI	Site of Special Scientific Interest – a site of national nature or geological conservation importance
SuDS	Sustainable Drainage Systems
SYPTE	South Yorkshire Passenger Transport Executive
TPO	Tree Preservation Order
UK	United Kingdom
WHO	World Health Organisation





## 1. Introduction

### 1.1 Purpose of this report and changes since 2014

Rotherham Metropolitan Borough Council (RMBC) is preparing a new Local Plan which will replace the adopted Unitary Development Plan (1999). The Local Plan consists of a number of documents:

- The Core Strategy (adopted 2014);
- The Barnsley, Doncaster and Rotherham Joint Waste Plan (adopted 2012); and
- The Sites and Policies document (currently in preparation), which will allocate sites for development and provide more detailed development management policies.

This document reports the findings of the Integrated Impact Assessment (IIA) of the pre-submission draft of the Sites and Policies document. Since 2013, Jacobs and RMBC have been conducting four separate but complementary assessments in order to inform the development of the Sites and Policies document. These are:

- Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) assesses effects of the Sites and Policies document across a range of environmental, social and socio-economic issues.
- Health Impact Assessment (HIA) assesses effects of the Sites and Policies document on the health and well-being of the population and its ability to access health-related facilities and services. This also addresses equalities issues and has some overlap with Equalities Impact Assessment.
- Equalities Impact Assessment (EqIA) assesses effects of the Sites and Policies document in terms of equalities issues, with particular focus on disadvantaged or excluded groups of people. EqIA helps identify where we can best promote equality of opportunity.
- Habitats Regulations Assessment (HRA) Screening assesses the potential for the Sites and Policies
  document to significantly affect European nature conservation sites, and determines whether there is need
  for a full Appropriate Assessment.

The assessments are integrated into a single reporting process for the Sites and Policies document. This Integrated Impact Assessment (IIA) Report summarises:

- how the IIA has informed the current emerging Sites and Policies document, including how IIA recommendations and consultation feedback from the previous round of consultation have influenced the plan:
- the likely significant effects of the emerging Sites and Policies document on communities, the economy and the environment: and
- how the IIA will continue to inform implementation of the emerging Sites and Policies document, for example, through recommended mitigation and monitoring.

This report will assist those participating in the consultation on the Sites and Policies document.

### 1.2 What does the Integrated Impact Assessment (IIA) Cover?

As stated in the previous section, the IIA includes an SA / SEA, HIA, EqIA and HRA Screening.

An SA is required by the Planning and Compulsory Purchase Act 2004. The aim of SA is to ensure that plans are doing as much as they can to support the delivery of social, economic and environmental objectives at the same time. Guidance on SA states that they should also meet the requirements of the SEA Regulations.

The SEA Regulations require that SEA addresses potential impacts on:

- biodiversity;
- fauna;
- flora;





- population;
- human health;
- soil;
- water;
- air:
- climatic factors;
- material assets;
- · cultural heritage, including architectural and archaeological heritage; and
- the landscape.

SEA must also address the interrelationships amongst the above topics, which means that additional topics such as geological conservation (related to 'soil' and 'biodiversity') and flood risk (related to 'water' and 'population') can be considered. This consideration, based primarily on professional judgement using guidance and experience, helps to provide further clarity and transparency when it comes to reporting impacts. These interrelationships are also partly covered by recognising the way one topic influences another – for example that good human health requires good air quality, and that healthy flora and fauna require non-polluted water.

HIA and EqIA are separate processes, but are linked to SEA. The 'human health' topic can be addressed more holistically and with greater depth through a HIA. HIA considers various 'determinants' of health, which include:

- Safety (including accidents, road injuries/deaths and risk of crime);
- Air quality;
- Noise pollution;
- Social mobility / network / community severance / community cohesion;
- Access to key services (including health services and policy, and such factors as travel response time of emergency services), employment, leisure opportunities, etc.;
- Physical activity;
- · Investment and employment;
- Assurance (reliability and journey planning, traffic congestion, perceived safety when travelling, etc.);
- Intrusion and land use; and
- Climate change / sustainability.

The EqIA addresses issues associated with the SEA topic of 'population and equality' in greater detail. Under the terms of the Equality Act 2010, the Council has a duty to prevent discrimination based on:

- Race:
- Gender;
- Disability;
- Age;
- Sexual orientation;
- Religion and belief;
- Gender reassignment; and
- Marriage and civil partnerships.

Both the HIA and EqIA processes remain standalone assessments which feed into the SA. The SA incorporates the key outputs of each process and uses them to ensure a consistent evidence base and consistent assessment results.





In terms of reporting, the results of HIA and EqIA can either be reported separately or in combined reports such as this. In this report, the environmental baseline and assessment is summarised under each relevant SA topic, with technical appendices used to provide further detail.

HRA is a requirement arising principally from the Conservation of Habitats and Species Regulations 2010<sup>1</sup>, and applies when submitting a local development document under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>2</sup>. As a process, it aims to ensure no plan, programme or project will have significant adverse effects on a European nature conservation site, except in exceptional circumstances.

### 1.3 Timeline of Plan and IIA Development

SA is not a one-off exercise; it needs to be integrated into the various stages of plan making. The staged approach undertaken to develop the Plan and carry out the IIA (which incorporates SA) followed guidance produced by the Planning Advisory Service (PAS).<sup>3</sup> These stages are shown in Figure 1-1, alongside the key activities taken by RMBC in developing the Sites and Policies document. The activities undertaken and the linkages between the Plan and IIA timelines are described below.

Appendix 1-B illustrates the key stages of IIA (incorporating SA) in isolation.

### Stage A:

Local Plan-Making: Develop an evidence base to inform the plan

**Sustainability Appraisal:** Develop a framework for SA and an evidence base to support it. Produce a Scoping Report

The SA scoping stage was initially completed in March 2006, following statutory consultation on an SA Scoping Report. It involved developing a framework for the SA, which set out the scope of the assessment and the social, economic and environmental evidence base used to inform the assessment and the Plan. The SA Scoping Report has since been revisited, updated and subsequently consulted upon in both 2011 and 2013, in order to provide a more current baseline situation and context review.

The Local Plan has likewise been under development since 2006, when production of the Core Strategy was initiated. While Core Strategy development was a precursor to the Sites and Policies document, development of the Sites and Policies document began in earnest in 2009, with the production of the Strategic Housing Land Availability Assessment conducted jointly for Sheffield and Rotherham, followed by the Employment Land Review in 2010. This was followed by the Sites and Policies Issues and Options consultation document in 2011. A wide range of evidence has since been collected about the development needs of the borough; these are discussed in Sections 2.1 and 3.3 of Volume 2 of this IIA Report.

### Stage B:

Local Plan-Making: Consider options for the Plan and prepare a Draft Plan

Sustainability Appraisal: Appraise the Plan options

The SHLAA and Employment Land Review provided an initial basis for the site options available for potential allocation in the Local Plan; however, iterative review and consultation on the sites and the Plan itself have led to additions and amendments to the site options available. These studies identified land with potential for future housing and employment development, without making any decision as to whether or not such sites should be developed. This decision is being made and consulted upon as part of the Sites and Policies document. The SHLAA was updated in December 2012.

<sup>&</sup>lt;sup>1</sup> The Conservation of Habitats and Species Regulations 2010. SI 2010 No. 490. http://www.legislation.gov.uk/uksi/2010/490/contents/made

<sup>&</sup>lt;sup>2</sup> Town and Country Planning (Local Planning) (England) Regulations 2012. SI 2012 No. 767. http://www.legislation.gov.uk/uksi/2012/767/contents/made

Planning Advisory Service (PAS) 2014. Good Plan Making Guide. http://www.pas.gov.uk/web/pas1/local-planning/-/journal\_content/56/332612/6627529/ARTICLE





The assessment of potential sites for the Sites and Policies document has been on-going since 2009, and until 2013, this was not specifically under IIA or SA, though it had addressed a range of sustainability considerations. A Red / Amber / Green scoring system was used for sites, and this fed into the Sites and Policies Issues and Options consultation document of 2011.

From 2013, the assessments of site options and of the draft plan were undertaken as part of the IIA. However, prior to 2013, work was conducted on the Core Strategy which relates to the 'reasonable alternatives' to the preferred Sites and Policies document. Volume 2 of the IIA describes the IIA work on the Core Strategy which fed into Sites and Policies document development.

Within the assessment stage, there are components of the Sites and Policies document which are assessed, including individual site proposals, policies and 'in combination' alternatives for sites. These have fed into overall Plan development. This type of 'iterative' assessment helps to ensure that sustainability considerations are built into the Sites and Policies document from an early stage.

#### Stage C:

Local Plan Making: Finalise the Draft Plan

Sustainability Appraisal: Prepare the SA Report documenting the appraisal process

We have produced this IIA Report to support the Sites and Policies document. This document also serves as the Strategic Environmental Assessment (SEA) 'environmental report' as required under the SEA Regulations. Appendix 1-F provides a summary of the requirements of the SEA Regulations, and where each of these is met or described within this IIA Report.

#### Stage D:

Local Plan Making: Consult on the Draft Plan

Sustainability Appraisal: Consult on the SA Report

In May 2013, the IIA Report of the draft Sites and Policies document was made available for consultation with the statutory consultees and the public (along with other stakeholder organisations) alongside the draft Sites and Policies document. The consultation was held for 10 weeks between May and July 2013. Following this, all responses received were collated and incorporated as appropriate into decision-making for finalising the Sites and Policies document.

Given a number of changes, and in particular the adoption of the Core Strategy with the Bassingthorpe Farm Strategic Allocation, the final Sites and Policies document was put through another round of consultation, alongside a revised IIA Report. The consultation was held for 6 weeks between October and November 2014. Following this, all responses received were collated and incorporated as appropriate into decision-making for finalising the Sites and Policies document for Submission.

Changes made to the Sites and Policies document between 2013 and 2014 are summarised in Appendix 1-A, Section 1-A.1, alongside a brief statement as to whether the changes necessitated assessment or amendment to the IIA.

### Stage E:

Local Plan Making: Submit the Final Plan for Examination

Sustainability Appraisal: Appraise any significant changes to the Plan following consultation

Since the previous consultation on the 'final draft' Sites and Policies document between October and November 2014, consultation feedback has been reviewed and considered, and the following changes have been made to the plan:





- Removal of the Bassingthorpe Farm Strategic Allocation sites from the pool of potential alternatives for better clarity (12 sites removed from the total count of sites and from the assessment tables allocation count had already been removed in 2014);
- Addition of 1 new potential site for consideration, but not allocated;
- Change of 1 site from an employment allocation to a residential allocation;
- Removal of 4 residential allocations;
- Removal of 5 employment allocations;
- Removal of 1 potential employment site (with no other allocation see below for sites changed to allocations);
- Removal of 1 allocation as safeguarded land for residential development;
- Removal of 1 mixed use allocation;
- Change of 3 sites from 'potential employment sites' to employment allocations;
- Change of 3 sites from employment allocations to 'special policy areas';
- Change of 2 sites from employment allocations to 'mixed use' allocations; and
- Site boundary changes.

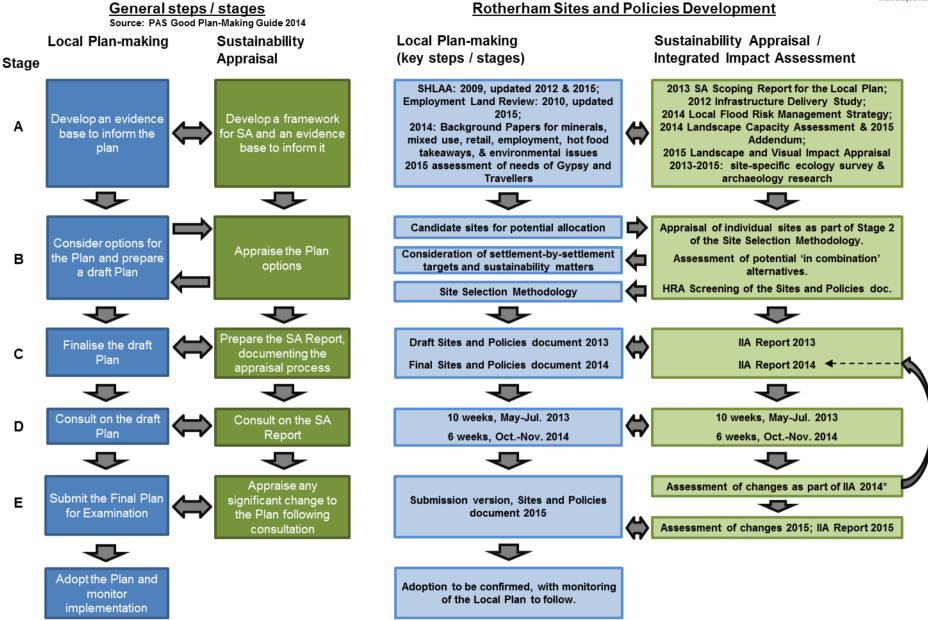
Changes made to the Sites and Policies document between 2014 and 2015 are summarised in Appendix 1-A, Section 1-A.2, alongside a brief statement as to whether the changes necessitated assessment or amendment to the IIA as documented in this IIA Report.

### Adopt the plan and monitor implementation

It is intended that the Sites and Policies document will be adopted following Examination, with proposed monitoring put in place to ensure its implementation and effectiveness.







<sup>\*</sup> The Sites and Policies document underwent a stage of appraisal of significant changes in 2014 which underwent a 2<sup>nd</sup> round of consultation, as indicated by the arrow.

Figure 1-1: The stages of plan development and sustainability appraisal relative to the Sites and Policies document





## 1.4 Structure of this Report

This IIA Report is split into four volumes:

- Volume 1: provides introductory and background information to the assessment;
- Volume 2: contains the assessment of site options / candidate sites, and selection of preferred sites;
- Volume 3: contains the assessment of policies and overall plan, considering the preferred sites selected; and
- Volume 4: comprises Site Survey Summary Sheets for each of the candidate sites considered.

This element of the report (Volume 1) comprises five chapters:

- Chapter 1 Introduction sets out the context for the assessment its relationship with the Local Plan, the topics covered and the timeline of Plan and IIA development;
- Chapter 2 About the Sites and Policies Document provides background to the Sites and Policies document, including its purpose, its objectives and the vision for the Local Plan;
- Chapter 3 IIA Methodology describes the IIA process, including the integration of SA into IIA and the assessment approach, summarises the development and assessment of 'reasonable alternatives' and in-combination alternatives, and identifies limitations and uncertainties encountered during the assessment;
- Chapter 4 Legislative and Planning Context summarises the findings of a review of local, national and international legislation and policy in the form of key links and themes which have bearing on the Sites and Policies document or the IIA; and
- Chapter 5 Sustainability Baseline provides a description of how the environmental, social and economic baseline for Rotherham has been applied throughout the IIA and this IIA Report (all volumes), and includes a brief summary of the baseline for Rotherham.

Further information, including a summary of changes to the Sites and Policies document draft-by-draft, the stages of SA / IIA, a summary of IIA-related consultation responses and an SEA Regulations compliance checklist, is provided in the appendices.





## 2. About the Sites and Policies Document

## 2.1 Purpose of the Sites and Policies Document

The Rotherham Local Plan serves to guide the way in which built development occurs in the borough, in regard to its relationship with communities and the surrounding environment. The Core Strategy and supporting Sites and Policies document together form part of the Local Plan. The Core Strategy sets out the vision and objectives for the Local Plan and development in the borough. This includes identifying policies which are needed to achieve the vision and objectives as sustainably as possible.

The Sites and Policies document sets out further detail on the implementation of the Local Plan. It identifies development sites across the borough to meet the targets set out in the Core Strategy, mainly for new housing and employment development. It also includes detailed policies to guide decisions on planning applications and facilitate implementation of the development sites. Other key strategies and plans for development include the South Yorkshire / Sheffield City Region LTP3 (adopted in 2011) and the Barnsley, Rotherham and Doncaster Joint Waste Plan (adopted in 2012).

### 2.2 Objectives of the Sites and Policies Document

The objectives of the Sites and Policies document are consistent with the vision and objectives for the Local Plan, as set out in the Core Strategy.

#### **LOCAL PLAN VISION**

Rotherham will be prosperous with a vibrant, diverse, innovative and enterprising economy. It will fulfil its role as a key partner in the delivery of the Sheffield City Region recognising the close economic, commercial and housing markets links with Sheffield and our other neighbouring authorities.

Rotherham will provide a high quality of life and aspire to minimise inequalities through the creation of strong, cohesive and sustainable communities. Rotherham will be successful in mitigating and adapting to future changes in climate. It will have a sense of place with the best in architecture, sustainable design and public spaces. Natural and historic assets will be conserved and enhanced. Rotherham will promote biodiversity and a high quality environment where neighbourhoods are safe, clean, green and well maintained, with good quality homes and accessible local facilities, making best use of existing infrastructure, services and facilities. A network of green infrastructure will link Rotherham's urban areas with the wider countryside, providing access to green spaces and acting as habitat links for wildlife.

The largest proportion of growth will be focused in the Rotherham Urban Area including major new development at Bassingthorpe Farm which is key to delivering growth in the heart of Rotherham. Regeneration of Rotherham town centre will enable it to fulfil its role as the borough's primary retail, leisure and service centre. Considerable development will take place on the edge of the urban area at Waverley, with the development of a new community and consolidation of the Advanced Manufacturing Park. Significant development will also take place in Principal Settlements for Growth: in the north around Wath, Brampton and West Melton, on the fringe of Rotherham Urban Area at Wickersley, Bramley and Ravenfield Common, and in the south-east at Dinnington, Anston and Laughton Common. New development will also take place in the borough's principal settlements and local service centres. Throughout Rotherham development will aim to create self-contained communities which support a network of retail and service centres, where the need to travel is reduced and communities enjoy good access to green spaces and the wider open countryside.





#### **LOCAL PLAN OBJECTIVES**

Delivering development in sustainable locations

#### Objective 1: Scale of future growth

By the end of the plan period, sufficient new homes and employment opportunities and a choice of development sites will have been provided to meet objectively assessed development needs.

#### **Objective 2: Green Belt**

In implementing the plan's spatial strategy over the plan period, the wider aims of national Green Belt policy will have been safeguarded while a borough-wide review will have informed the release of Green Belt land in the most sustainable locations for growth to meet future needs.

#### **Objective 3: Sustainable locations**

By the end of the plan period, the majority of new development will have been located in or on the edge of sustainable urban locations, close to transport interchanges and within transport corridors. Wherever viable and sustainable, previously developed land will have been used first. Car dependency and the need to travel will have been reduced by the promotion of higher housing densities and mixed use developments in appropriate locations, travel planning and public transport improvements.

Creating mixed and attractive places to live

#### **Objective 4: Provision for housing**

By the end of the plan period, implementation of the plan's policies will have helped improve quality and amount of housing available in all areas of Rotherham. Development of new housing will have improved choice of type, tenure and affordability, including provision for gypsies and travellers. Any established need for affordable housing in specific rural communities will have been met.

Supporting a dynamic economy

#### Objective 5: Retail and service centres

By the end of the plan period, the plan's "town centre first" approach to development decisions will have improved the economic viability and vibrancy of Rotherham Town Centre as the borough's principal location for business, commerce, culture, leisure, town centre uses and civic activities. The plan will have supported the aim of providing a community stadium as close to Rotherham town centre as possible. The implementation of a retail and settlement hierarchy will have steered new development to appropriate centres to sustain and, where appropriate, extend retail, leisure, employment and community services. Smaller local centres will have been sustained to continue provision for local daily needs.

#### **Objective 6: Provision for employment**

By the end of the plan period, the borough's economy will be more modern, diverse and enterprising and will have moved closer to a low-carbon economy. Implementation of the plan's policies will have helped provide a wide range of accessible job opportunities in the borough. The regeneration and improvement of existing employment sites will have been complemented by the creation of local and rural employment opportunities.

Movement and accessibility

#### **Objective 7: Local transport connections**

By the end of the plan period, the proportion of trips made by walking and cycling will have increased. Public transport interchanges and bus services between local communities will have been improved. Implementation of the plan's policies will have helped to secure improved information technology networks to





enable increased "teleworking", along with the development of live/work housing and mixed use schemes in appropriate locations.

### Managing the natural and historic environment

#### Objective 8: Landscape, historic environment and settlement identity

Implementation of the plan's policies over the plan period will have helped promote the continuing management, protection and enhancement of the borough's distinctive historical features and landscape character. While allowing for growth of certain settlements to implement the plan's spatial strategy, wherever possible, the identity and setting of individual settlements will have been maintained and enhanced.

#### Objective 9: Greenspaces, sport and recreation

By the end of the plan period, the borough's network of green infrastructure will have been identified, conserved and enhanced. Implementation of the plan's policies will have protected and enhanced the borough's network of accessible sport and recreation facilities and helped improve the health of Rotherham's population.

#### Objective 10: Biodiversity / geodiversity

By the end of the plan period, the borough's significant biodiversity and geodiversity sites will have been identified, designated, conserved, managed and enhanced. Opportunities for expanding, linking and creating significant sites will have been identified and delivered. The geodiversity, habitats, and greenspace ecosystems of the wider environment will have been conserved, enhanced and managed by implementation of the plan's policies. The borough's best and most versatile agricultural land will have been protected, wherever possible, to promote local food production.

#### **Objective 11: Minerals**

By the end of the plan period, the borough's mineral reserves will have been identified and managed to provide for the needs of the construction industry and to meet Rotherham's contribution towards the infrastructure, buildings, energy and goods that the country needs. In tandem with this, the use of recycled and secondary sources, sustainable site waste management practice and the use of sustainable building materials will have been increased by implementation of the plan's policies. Sources of local building materials will have been safeguarded for conservation of the borough's built heritage.

#### **Objective 12: Managing the water environment**

By the end of the plan period, implementation of the plan's policies to regulate development will have conserved, managed and enhanced the borough's water environment and contributed to the wider integrated management of water catchments. The risks of pollution of rivers and water resources, depletion of water supplies, flooding and harm to biodiversity and leisure interests will have been minimised by implementation of the plan's policies.

#### Objective 13: Carbon reduction and renewable energy

By the end of the plan period, the borough's carbon footprint will have been reduced from current levels. Implementation of the Plan's policies will have secured an increased proportion of energy generation via renewable and low carbon means and will have promoted energy efficiency, energy conservation and the use of sustainable construction techniques.

### Creating safe and sustainable communities

#### **Objective 14: Design**

By the end of the plan period, new development built to sustainable design standards will have contributed to the creation of safe, accessible, and well managed places, buildings and public spaces. The design of new





development will have contributed to and enhanced the distinctive townscape and character of heritage features within communities.

#### Objective 15: Community well-being

By the end of the plan period, implementation of the plan's policies will have helped to reduce crime levels and minimise the potential results of terrorist activity by improving the design of new development. The potential risk to nearby populations from hazardous installations will have been minimised by the designation and enforcement of appropriate stand-off zones. Decisions on the location and type of development will have helped to reduce pollution levels in the borough's air, land and water and will have taken account of the borough's legacy of former coal mining activity.

#### **Objective 16: Waste management**

By the end of the plan period, a strategic waste management facility will have been provided to deal with the borough's forecast needs. Implementation of the plan's policies, or those of joint plans covering the borough, will have promoted a reduction in waste levels by utilising waste as a raw material for industry and energy production and by encouraging increased recycling rates.

#### Infrastructure

#### **Objective 17: Infrastructure delivery**

By the end of the Plan period, the necessary utility infrastructure to support new development will have been provided in appropriate locations. Local community services will have been provided or existing services enhanced in keeping with the scale of planned new development in each community.





#### **Integrated Impact Assessment Methodology** 3.

#### 3.1 Guidance on SA, HRA, HIA and EqIA

This report has been prepared in accordance with statutory requirements for SEA and HRA, and available guidance on SA, HIA and EgIA. Rotherham Metropolitan Borough Council's (RMBC) EgIA Toolkit, which interprets their responsibilities under the Equalities Act 2010, has also been taken into account in development of this report.

As described in Section 1.3, the IIA of the Local Plan has been conducted since 2006, and that of the Sites and Policies document since early 2013. During this time, guidance on the overarching process of SA has changed and evolved, although the fundamental steps and principles of good practice have remained consistent and largely been improved.

The principal source of guidance on SA is Local Government guidance provided by the Planning Advisory Services (PAS), namely its Good Practice Guide on Plan Making<sup>4</sup> (PAS, 2014).

Draft guidance on HRA of plans was issued by the Department for Communities and Local Government in 2006, and though it was never finalised, it still provides direction on conducting HRA screening and assessment stages.

Guidance on HIA and supporting principles comes from a variety of sources, including:

- the HIA Gateway (from Public Health England);
- Draft Guidance on Health in Strategic Environmental Assessment: Consultation Document (Department of Health, 2007);
- Policies and strategies to promote social equity in health (Dahlgren G. and Whitehead M., 1991);
- Local basket of inequalities indicators (Association of Public Health Observatories and the NHS Health Development Agency, 2003); and
- Health 21: An introduction to the Health for All Policy Framework for the WHO European Region. (WHO, 1999).

Guidance on EqIA tends to be tailored to organisations, however some general guidance and guidance specific to Rotherham include:

- Rotherham's Equality Analysis: A guide and methodology (2011);
- Equality impact assessment guidance: A step-by-step guide to integrating equality impact assessment into policymaking and review (Equality and Human Rights Commission, 2009); and
- Equality Impact Assessment: Summary, tool and guidance for policy makers (Department of Health, 2009).

#### 3.2 **Overall Approach**

The team responsible for undertaking this IIA is aware that a number of Local Plans have either been found unsound or have been subject to legal challenge post-adoption due to deficiencies in the SA process.

The team has constantly monitored and reviewed development Rotherham Local Plan IIA, particularly in the light of challenges and Inspectors' reports. The IIA for the Sites and Policies document has followed an approach based on the following principles, helping to ensure that the process is appropriate, robust and transparent:

<sup>&</sup>lt;sup>4</sup> Planning Advisory Service (PAS) 2014. Good Plan Making Guide. http://www.pas.gov.uk/web/pas1/local-planning/-/journal\_content/56/332612/6627529/ARTICLE





- The IIA has been completed by an independent team (external to RMBC). This has brought an outside perspective and enabled any weaknesses (either perceived or actual) to be challenged from the outset.
- Despite the significant resources required, an early decision was taken to undertake a site-by-site
  assessment. This means each potential site is tested and assessed on its respective merits and
  constraints.
- The IIA has applied a rating system to allow a form of comparative analysis to be carried out.
- Detailed schedules have been produced, allowing a site promoter or objector to follow the analysis undertaken for each individual site.
- Suitable alternatives have been identified and assessed.
- The IIA is part of a wider Site Selection Methodology and is not the final decision-making tool in terms of deciding which sites are allocated. Instead it serves as a decision-informing tool.

The PAS Guidance (2014) identifies that 'a common method used for Sustainability Appraisals is to define a framework for assessment based on number of sustainability objectives. Local Plan options can then be appraised in relation to these objectives and their likely impact on the baseline environmental, social and economic context.' These sustainability objectives can be used as the basis for the assessment of emerging plan options (PAS, 2014, p. 31).

The SA Framework is the set of SA Objectives which can be used as the back-drop for considering, assessing and comparing the sustainability effects of a given plan or strategy in the Local Plan. The SEA Regulations stipulate that assessment must be made using an evidence base, and thus not solely based on professional judgement or broad 'compatibility' with objectives. Therefore, the SA Objectives should help to guide and focus assessment, but not be used as a replacement for a suitable assessment methodology.

Rotherham's approach to this IIA applies the SA Framework (see Section 3.3) as a guiding tool, however the actual assessments made under each of the IIA topics are conducted against the evidence base (the baseline).

Guidance also states that SA should take a 'risk-based' approach, which means it must recognise that any impacts predicted are not guaranteed to arise and can be eliminated or adequately controlled at the project-level. SA seeks to ensure that the risks of impacts or effects are avoided, mitigated or managed appropriately, and that the opportunities for benefits are realised wherever possible.

This IIA, which incorporates SA, identifies risks that significant effects or impacts might occur and outlines potential control mechanisms that can be put in place to avoid, reduce or offset the potential impacts of those risks. The IIA can also be used as a platform for identifying opportunities for beneficial impacts and determining specific policies or proposals which may facilitate or enhance such benefits.

This is particularly relevant for the Sites and Policies document, which has developed alongside the IIA and has incorporated within its policies ways of mitigating risks of negative impacts and taking advantage of opportunities for benefits.

The IIA also includes an assessment of the potential significant residual effects that may arise as a result of any risks and opportunities that remain even with mitigation in place.

#### 3.3 SA Framework and Scoping of Issues for this IIA

In March 2013, the SA Framework (refer to Table 3.1 and Appendix 1-C) and detailed baseline were revisited. The structure of the SA Framework was improved in order to make the addressing of key topics clearer, as well as to reduce repetition and make the assessment process more practical and transparent overall. Although these have been relatively minor changes, they have helped strengthen the way in which recent assessment work has been reported, and will influence how new work will be reported in the future. In addition, new information sources for the detailed baseline were identified, enabling the baseline to be updated.





Throughout this scoping process, data collection focused on identifying:

- the current situation in Rotherham;
- · key issues external to Rotherham for which data is readily available;
- the trends within Rotherham; and
- · regional and national comparisons.

From analysing this information and through ongoing discussions with stakeholders, key sustainability issues for Rotherham were identified for consideration in the assessment.

The SA Framework agreed at the scoping stage is presented in Table 3.1 below. As part of the Scoping Report update (March 2013), these SA Topics and Objectives were amended to allow for more efficient and effective assessment of potential effects for the remaining documents of the Local Plan. As the SA has subsequently been incorporated into the IIA, this also represents the topics addressed by the IIA.

Table 3.1: SA Objectives for Rotherham

SA Topic	Ref.	SA Objectives
Population and Equality	1	Enable and enhance equality (including decent, affordable housing for all) and tackles prejudice and discrimination.
2. Health and Well-Being	2A	Improve the health of the people of Rotherham, reduce disparities in health and encourage healthy living for all.
	2B	Improve access to quality cultural, leisure and recreational activities available to everyone.
	2C	Enhance safety, and reduce crime and fear of crime for everyone.
	2D	Reduce the negative impact of noise on people and their surroundings.
Accessibility / Community Facilities	3A	Build community cohesion, involvement and encourage a pride in the community.
	3B	Enhance internal and external images and perceptions of Rotherham and make Rotherham a good place to live, work or visit.
4. Education / Skills	4A	Improve the level of education and skills for all, reducing disparities across Rotherham and strengthening its position regionally and nationally.
	4B	Encourage creativity, innovation and the effective use of sound science and appropriate technology.
	4C	Promote awareness of sustainable development and encourage sustainable lifestyles and business practices.
5. Economy and Employment	5A	Enhance the provision of quality local or easily accessible employment opportunities for all in stable or competitive growth sectors.
	5B	Enhance conditions that enable sustainable economic growth and investment.
	5C	Enhance the function and vibrancy of town or district centres.
	5D	Protect and improve infrastructure related to communications and the management of energy, solid waste and wastewater.
6. Transport and Carbon	6A	Improve sustainable transport and movement patterns.
Emissions	6B	Reduce greenhouse gas emissions and increase the use of renewable energy.





SA Topic	Ref.	SA Objectives
7. Biodiversity	7	Enhance Rotherham's habitats and biodiversity.
8. Air Quality	8	Reduce the negative impact of air pollution on people and the natural environment.
9. Water Resources	9	Reduce the risk of water contamination and assist in meeting Water Framework Directive objectives.
10. Soil and Geology	10A	Enhance geological diversity, reduce risks to soil pollution and protect soil quality.
	10B	Reduce the rate of water consumption.
11. Flood Risk	11	Reduce Rotherham's vulnerability to flooding.
12. Waste and Mineral	12A	Reduce the rate of mineral resource consumption.
Resources	12B	Reduce the amount of waste requiring disposal and reduce the use of non-reusable materials.
13. Landscape and	13A	Enhance the landscape and townscape quality of Rotherham.
Townscape	13B	Reduce light pollution and its effects on people and their surroundings.
14. Historic Environment	14	Enhance the historic assets of Rotherham.

### 3.4 Consultation on the IIA Scope

As stated in Section 1.3, the SA / IIA Scoping Report was most recently consulted upon in 2011 and 2013. The Scoping consultation responses are provided in Appendix 1-D, Section 1-D.1, including the Council's responses to stakeholder comments and how relevant comments were addressed. Consultation resulted in the minor amendment of SA/IIA Objectives, amended guide questions for assessment, the updating of baseline and plan/policy context, expanded or elaboration upon the scope of specific environmental matters, the reduction of scope to exclude extraneous environmental matters, and notes and suggestions for the future assessment stage.

Such amendments are reflected within this IIA Report, where applicable.

### 3.5 Identifying Alternatives

#### 3.5.1 Reasonable Alternatives

It is a requirement of SEA legislation that 'reasonable alternatives' to the preferred plan are considered and assessed. Guidance and experience from SEAs previously undertaken in the UK and internationally require that the alternatives are 'reasonable' in terms of being:

- able to meet the objective(s) of the plan; and
- realistic / able to be delivered.

#### 3.5.2 Policy Alternatives

As stated in Section 2.1, the purpose of the Sites and Policies document is to identify development sites across the borough to meet the targets and achieve the objectives set out in the Core Strategy, mainly for new housing and employment development. In fulfilling this purpose, there has been a great many sites available for potential allocation as employment or housing sites, and the Council has had to select those sites which make the best contribution towards economic development and housing provision in the borough, whilst causing the least environmental harm or with least potential for adverse social and economic impacts within a community.

Chapter 3 of Volume 2 of this IIA Report discusses the background of policy alternatives which is relevant to the Sites and Policies document. However, the IIA / SA of such alternatives was mainly conducted as part of





the development of the Core Strategy, which his now adopted. As such, it is relevant and important context that the Sites and Policies document is a subsidiary document to the adopted Core Strategy. (Refer to Chapter 3 of Volume 2 for more information.)

In terms of the polices element of the Sites and Policies document, one area of policy alternatives has been considered by the IIA – that for wind farm 'areas of search' as part of Policy SP60 – Sustainable Construction and Wind Energy. These alternatives are shown and assessed in Chapter 2 of Volume 3 of the IIA Report.

The remaining policies of the Sites and Policies document build upon those set out in the Core Strategy, which has been subject to alternatives assessment as part of its own SA. Over the course of the Sites and Policies document's development, no significantly different, alternative ways of building upon the Core Strategy policies have been identified. Therefore, there has been no requirement to assess alternative policies as part of this IIA.

#### 3.5.3 Site Alternatives

The full process of identifying spatial and site alternatives as part of Local Plan development is discussed in detail in Chapter 3 of Volume 2 of the IIA Report. This history of Sites and Policies document development is intrinsically linked to policy alternatives as discussed in the previous section, since very high-level spatial distribution of development is closely tied to certain policies (e.g. in the Core Strategy). Chapter 3 of Volume 2 discusses the following main areas of alternatives identified:

- The Local Plan Spatial Strategy how the preferred strategy was arrived at in light of alternatives;
- The Initial Identification of Sites how the Council came up with an initial 'long list' of potential sites in order to conform with the Spatial Strategy, and how this then developed over time; and
- The development of 'In Combination' Alternatives how the IIA identified where and why particular combinations of sites warranted consideration and assessment, and thus influenced decision-making.

In brief, Policy CS1 of the adopted Core Strategy provides the Spatial Strategy for the borough, setting out the approximate levels of planned development for settlement groupings over the plan period. A number of alternative approaches to the distribution of development in the borough were considered and discarded early on in Local Plan development, having considered their potential sustainability implications. Policy CS1 (as adopted) therefore reflects what the Council considers to be the most sustainable approach to development in the borough relative to those alternatives which were identified.

The identification of site alternatives began in 2008 as part of the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review. The SHLAA was updated in 2011 and again in 2012. The Employment Land Review was published in 2010.

A SHLAA is a process that identifies land with potential for future housing development, without making any determination as to whether or not such sites should be developed. The SHLAA update was overseen by a Working Group comprising representatives from a number of key organisations involved in housing delivery or provision of associated infrastructure, such as the Campaign to Protect Rural England (CPRE) and the Home Builders Federation.

The following key steps were undertaken as part of the SHLAA:

- Existing information on sites held by RMBC was reviewed, including sites suggested by respondents as part of consultation on the emerging Local Plan;
- Areas of search for potential housing land were defined;
- Excluded areas were established (e.g. designated nature conservation sites);
- A 'Call for Sites' was undertaken in 2008, which allowed house builders, developers, land owners and their representatives to make suggestions on where future housing growth could be accommodated;
- Further site suggestions were considered, including from SHLAA and Local Plan consultations, developer enquiries and planning applications; and





Assessment of suitability for housing development, availability and achievability was carried out.

Further information can be obtained within the SHLAA document, a link to which can be found in the references section (see RMBC and Sheffield City Council, 2012).

The Employment Land Review similarly identified land with potential for future industrial or commercial development, again without making any determination as to whether or not such sites should be developed.

Further information can be obtained within the Employment Land Review document, a link to which can be found in the references section (see RMBC, 2010).

Most of the sites considered in the IIA were identified through the SHLAA and Employment Land Review. The identification of additional alternative sites has formed an ongoing and iterative part of Local Plan development, consultation and engagement with stakeholders.

As stated above, SEA requires identification of 'reasonable alternatives' to the plan. Whilst the SHLAA and Employment Land Review included some inherent tests regarding feasibility of sites for development, a more comprehensive 'reasonableness' test was undertaken as part of site selection. This formed Stage 1 of the Site Selection Methodology: Automatic Site Exclusions – see Appendix 2-C of Volume 2. Section 3.3.3 in Volume 2 of the IIA Report summarises this process.

Following the assessment of sustainability constraints of individual sites, further 'reasonable alternatives' were identified in the form of 'in combination' alternatives. Further information on this step can be found in Section 3.4 of Volume 2.

### 3.6 The Site Selection Methodology

As stated in Section 2.1, the Sites and Policies document allocates sites for development; it does this in recognition of their positive attributes such as their relationship to the existing built settlement and to meeting the settlements role and targets established in the Spatial Strategy (detailed in policy CS1 of the Core Strategy). Whilst it is acknowledged that there will most likely be identified constraints associated with the allocation of some development sites, it is anticipated that these issues and constraints will be suitably mitigated within any future resolutions to grant planning permission.

A number of sustainability factors including known constraints identified as part of the on-going evidence base preparation, have been evaluated to establish each site's suitability to accommodate future development. This IIA Report summarises the sustainability appraisal, the site selection process and the results for each site at Stage 2 of the Sustainability Appraisal of sites.

A detailed Site Selection Methodology was prepared to guide the decision-making process. The application of the site selection methodology from stage 2 (the Sustainability Appraisal of individual sites) has systematically assessed each site put forward for consideration and the "likely significant effects" arising and, at stage 3, (the prioritisation of sites) its potential suitability for allocation as a development site in the Local Plan. While the site selection methodology aimed to select the most suitable sites, other attributes (including the potential to avoid or mitigate effects identified) have also been taken into consideration, this has, in some circumstances, led to sites which performed well, not being allocated.

The Sites and Policies document identifies sufficient allocations to meet the requirements for each settlement grouping as set out in Policy CS1 of the Core Strategy. The Core Strategy has pre-determined the level of growth which is sustainable for each settlement based on the characteristics of that settlement. As such, decisions to allocate sites across the Borough must be taken on a 'settlement by settlement' basis as well as a 'site by site' basis.

The following is a summary of the three stages of the Site Selection Methodology:

• Stage 1 represents an initial sieving exercise. The objective has been to filter out at an early stage all those sites that have a significant overriding constraint(s) to development or are already developed. It has also enabled the "reasonable alternatives" to be defined in order to meet the requirements of the





SEA Regulations. Any constraints identified at this stage have been considered so significant that development is highly unlikely to be appropriate. The constraints relate to whether or not the site broadly conforms to the Rotherham Local Plan Core Strategy settlement hierarchy and a number of key environmental and heritage considerations. (See Volume 2 of this IIA Report.)

• Stage 2 represents the "SA" of individual sites. It has considered the remaining sites and looked at more detailed site-specific considerations and constraints. The aim of Stage 2 has been to assess all sites that are deemed suitable under Stage 1 against a number of detailed site-specific sustainability factors and potential constraints to development, and by doing this, to comply with SA / SEA requirements. These relate to a variety of social, economic and environmental issues which conform to the statutorily agreed IIA / SA Framework. A simple Red / Amber / Green assessment for each of the criteria has been used. (See Volume 2 of this IIA Report.)

**SA** is not a decision-making tool, but rather **SA** informs decision-making. While the IIA / SA Objectives must be taken into account, other planning considerations must also influence decisions. Red / Amber / Green SA overall 'scores', covering socio-economic considerations and environmental considerations, have been given to each site and considered in the Stage 3 site prioritisation assessment. New or further evidence on constraints and possible mitigation could alter the scoring / outcome in future plan-making.

• Stage 3 has aimed to prioritise all the sites that have progressed through from stage 1 and gone through the SA process. This has enabled sites to be compared against each other and prioritised those sites that are the most sustainable for development and best meet the priorities set out in the Core Strategy. This stage has looked at Green Belt / non-Green Belt, type of urban extension to settlements, deliverability and other known physical constraints, including the proposed HS2 route. The cumulative effects of development as identified under the IIA / SA have also be considered / rated here. (See Volume 2 of this IIA Report.)

A red, amber green rating of sustainability indicators has been undertaken as part of this site selection process, and enabled site-by-site comparison. At stage 3, the potential for mitigation to avoid a major adverse effect was taken into consideration. If there were any potential major adverse effects which could not be avoided, this had to be considered against the alternatives and the potential benefits offered by the site. For each site considered, a summary record has been prepared which clarifies the type of development that is acceptable on the site or the reason why a site has not been taken forward as a development site allocation (these are found in Volume 4 of this IIA Report). These site summary records are available to download as supporting evidence base information to this document. Generally there are no insurmountable issues to the allocation of the development sites but by its nature the Site Selection Methodology tends to highlight constraints and this can bring out the potential negatives more than the potential positives.

It should therefore be noted that even some sites which appear less sustainable have been allocated for development at the Stage 3 site prioritisation assessment. This is because they still represent the best alternative sites available to meet the development needs for each settlement grouping identified within the Core Strategy. Sites which have been identified as sustainable when measured against these criteria and based on current knowledge of constraints, could still be considered for allocation in the next review of the plan or if circumstances changed as a result emerging SHMA. For those sites taken out of the Green Belt, a further assessment has been undertaken in respect of the four Green Belt purposes. This information was used as part of the overall site assessment and in comparing potential Green Belt sites for development, but it did not override broader sustainability considerations.

The Council followed a transparent and robust methodology in undertaking site assessments as referenced in the Flow Chart at Figure 3-1. The Council has also undertaken desk-based and on-site surveys, and has supplemented its evidence base with further research work where relevant.





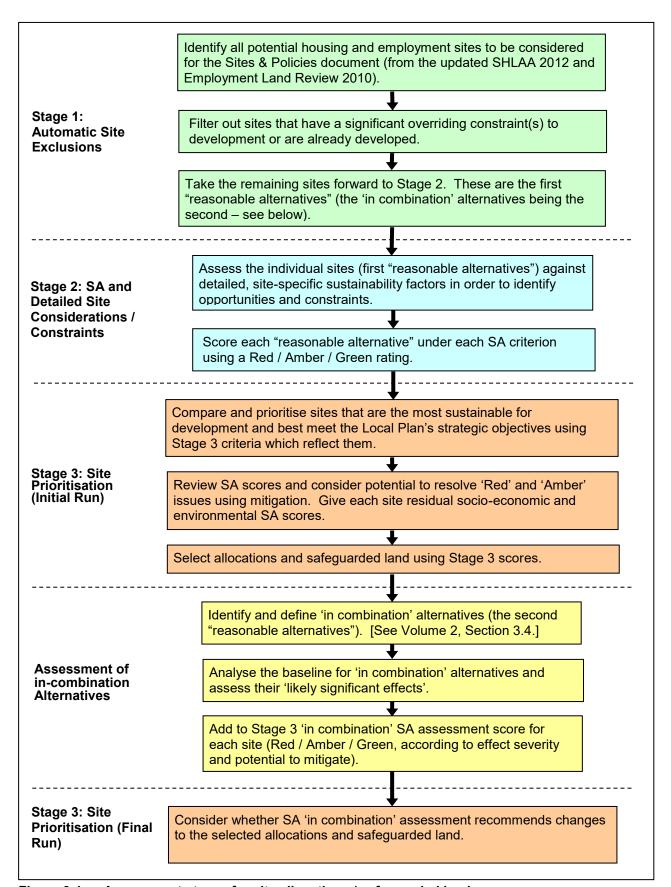


Figure 3-1: Assessment stages for site allocations / safeguarded land





The Council has carefully weighed all of the information available and reviewed any additional work undertaken to determine the final development site allocations:

- a review of the baseline information including the SA/IIA and detailed Green Belt Review;
- engagement with local landowners, agents and developers to ensure that those sites proposed to be allocated are deliverable; a SHLAA has been prepared (see Section 3.5). To be considered deliverable, sites should, at the point of adoption be:
  - Available the site is available now and free of ownership constraints;
  - Suitable the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities;
  - Achievable there is a reasonable prospect that housing will be delivered on the site within the time-frames identified;
- site visits and surveys have been undertaken on a number of occasions; and
- consultation on all Local Plan documents has been carried out over a number of years and this has enabled the Council to refine its approach and choose the most appropriate sites.

Following the Sustainability Appraisal, the Council has selected those development sites for allocation it considers are most appropriate to meeting the following factors:

- meet the future needs of existing communities as set out in the Core Strategy;
- take best advantage of existing services and facilities including educational, health, social and leisure facilities, good transport links and good accessibility by sustainable transport means including public transport, walking and cycling and good access to potential employment opportunities;
- allocate sites that relate well in locational terms to existing communities taking into account the impact
  of site allocations on the openness of the Green Belt, local landscape and topography;
- where appropriate enable the development of new sustainable communities;
- allocate employment sites that relate well to the national highway network and to local communities to take advantage of an accessible workforce; and
- provide employment opportunities for the benefit of the local economy.

Finally the Council has listened carefully to the concerns of local people and determined an appropriate policy response, where there is no over-riding physical, social or political constraint or objection to its allocation as a development site.

Further information on the Site Selection Methodology, including the methodology itself, can be found in Volume 2 of this IIA Report.

#### 3.7 Method of Assessment

#### 3.7.1 Assessment of Reasonable Site Alternatives

As discussed in Section 3.6, the SA has been integrated into the Site Selection Methodology (as Stage 2). The structure of the Site Selection Methodology was as follows:

- Stage 1: Initial Sieving allows the elimination of 'unreasonable' alternative sites;
- Stage 2: Conduct SA consider detailed, site-specific considerations and constraints; and
- **Stage 3:** Prioritise Remaining Sites apply a range of SA and non-SA considerations (e.g. policy considerations) in order to prioritise sites for allocation.

Figure 3-1 illustrates the different stages of the assessment leading to site allocations / safeguarded land.





In addition to the information provided in Figure 3-1, the assessment of in-combination alternatives was done by:

- analysing and identifying the baseline which could receive effects greater than the individual effects of sites;
- reviewing alternative sites within the same settlement (given that alternatives in different settlements will have been considered via the above steps, as well as the Core Strategy's Spatial Strategy); and
- identifying sites that do not have similar types / severity of effect but could meet the same capacity requirement.

The SA of allocations has been structured in accordance with the SA Framework (refer to Table 3.1 and Appendix 1-C). This is made up of SA Topics and Objectives covering environmental, social and economic issues. We have developed criteria relevant to site selection and physical features or constraints, and framed our criteria under the relevant SA Topics. Where relevant, we have merged the consideration of the different SA Topics where constraints or features overlap on different issues (for example, access to sustainable transport modes addresses several socio-economic topics). The criteria mainly focus on constraints and therefore risks of negative effects, which is a proportionate and SEA-compliant level of assessment detail at this stage.

A simple Red / Amber / Green assessment for most of these criteria has been used as follows:

**Red**: indicates a potentially significant constraint and/ or significant negative impact on the achievement of an SA Objective;

Amber: indicates some potential constraint and/ or negative impact on the achievement of an SA Objective; and

**Green**: indicates where there is no known constraint and/ or little negative impact on the achievement of an SA Objective.

The purpose of this scoring was not only to compare sites, but also to report on their "likely significant effects" in order to comply with the SEA Regulations. A site with a high number of 'red' assessments (i.e. many risks of major negative effects) is unlikely to have been taken forward to the next stage unless a shortage of more suitable sites resulted in insufficient allocations to reach the Core Strategy settlement target. The assessments may not capture all constraints, but any additional known constraints on particular sites have been included within the overall site assessment and taken into account in the decision on whether to progress the site to Stage 3 (the final stage of the Site Selection Methodology). Where applicable, additional refinement and further investigations have also been carried out at the prioritisation stage.

As part of an iterative assessment, the above steps were conducted as part of an assessment of the Draft Sites & Policies document in 2013, then for the 'final' draft in 2014, and as amended for the submission version of the Plan in 2015. Between 2013 and 2014, alternatives were reconsidered as appropriate, relative to subsequent changes resulting from development of the Core Strategy. For the 2014 and 2015 IIA Reports, the consideration of alternatives has taken account of consultation responses on the previous drafts of the Sites and Policies document and accompanying IIA.

#### 3.7.2 IIA of Policies set out in the Sites and Policies document

The IIA topics have been used to create 'topic paper' chapters within Volume 3 of this IIA Report, and each of the IIA Objectives has been listed and considered under each topic. Each topic chapter documents the assessment of the SA of the Sites and Policies document policies and applies the outcomes of these assessments to the identification of risks, opportunities and effects within Rotherham. This analysis takes into consideration the combination of Core Strategy policies, site allocations / safeguarded land and policies of the Sites and Policies document.

Table 3.2 below describes what each section of a topic chapter contains.





Table 3.2: Explanation of Topic chapter Content of Volume 3 of this IIA Report

Section within each Topic chapter, Volume 3 (where "N" stands for the Chapter, 4 – 16)	Explanation of What it Contains
N.1 Topic Definition and Approach	This section introduces the topic and relevant part of the SA/ IIA Framework (objectives and criteria).
N.2 Baseline for the Topic	This section outlines the baseline information that is relevant to the topic.
N.3 Relevant Issues (Risks and Opportunities) from Allocations Assessment	This section lists the environmental and socio-economic issues (as relevant to the topic) of the allocations and safeguarded sites which were identified through the IIA.
N.4 Policy Analysis: Risks and Opportunities	This section analyses the policies of the Sites and Policies document and any risks and opportunities they present, as well as existing and potential mitigating policies. It also considers the risks in light of the baseline identified in Section N.2.
N.5 Regional, National and Global Effects	This section discusses cross-boundary effects and provides appropriate analysis.
N.6 Summary of the Net Effects of the Sites and Policies Document	This section provides an assessment of the likely significant effects of the Sites and Policies document as a whole – including the combination of allocations and policies.

Each of the policies assessed have been 'screened' for their relevance within each IIA topic, and this has been presented in a series of tables. Policies have been screened according to:

- the potential for physical development to result from implementing the policies;
- the nature of the physical development proposals within them and how this can influence society (including the economy) and the environment;
- the mitigating nature of the policies in terms of leading to requirements for 'risk controls' such as better site selection, better design and layout, better integration with the surrounding environment and infrastructure, project-level assessment or developer contributions; and
- the enhancing nature of policies in terms of how they direct development to achieve greater benefits than would otherwise be achieved.

The first table in each chapter summarises which policies are relevant to the topic and why.

The baseline as updated from the 2013 Scoping Report has been inserted into each chapter for reference.

This is then followed by the assessment of risks of significant negative effects, and opportunities for significant beneficial effects. This section addresses the complex range of potential impacts required by the SEA Regulations, including direct, indirect, primary, secondary (and tertiary), short-term, long-term, permanent, temporary and cumulative. It begins with a discussion, and is summarised by a table of the significant risks and opportunities.

The table of significant risks and opportunities considers other policies of the Sites and Policies Document and Core Strategy which have already been developed to avoid or manage these risks, or to enhance the opportunities. This is perhaps the most important aspect of reporting as it demonstrates the key interlinkages amongst policies within each IIA topic, and is a clear demonstration of how issues have been addressed. It can also be used to demonstrate whether or not the issues (including the residual risks) need to be addressed further.

At the end of the assessment section, the key residual risks and opportunities are listed. These are those which still exist regardless of the Sites and Policies document policies, taking into consideration the constraints and opportunities identified during the assessment of proposed allocations and safeguarded





land. Some of the risks can be managed further (as per our recommendations), and others will remain risks due simply to the nature of proposals or of high-level planning. Such risks can only be further managed after the Sites and Policies document is adopted and often by other parties, such as developers. Finally, some of the opportunities can be enhanced, again as per our recommendations, which are summarised at the end of each chapter.

Both the HIA and EqIA follow the same format for assessment of potential impacts as outlined above in an attempt to streamline and integrate all three processes.

As part of an iterative assessment, the above steps were conducted as part of an assessment of the Draft Sites and Policies document in 2013, for the final draft in 2014, and again for this pre-submission version in 2015.

The 2015 Sites and Policies Document (pre-submission version) has been reviewed to assess the changes to earlier versions of the policies for their relevance within each topic. A summary of the changes between the policies in the Sites and Policies Document 2014 and the Sites and Policies Document (pre-submission version) 2015 is provided in Appendix 1-A, Section 1-A.2.

### 3.8 Biodiversity Assessment and HRA Screening methodology

The assessment of impacts on biodiversity was carried out in line with the methodology provided in the previous two sections. The Council's ecologist has produced, wherever feasible, an informed assessment of species potential on a site-by-site basis to inform the Stage 2 assessment. In addition, HRA Screening was conducted to ensure there is no potential for a likely significant impact on European nature conservation sites. This followed the methodology below.

Table 3.3 below shows the Natura 2000 sites considered for any indirect impact on relevant bird populations within Rotherham Borough.

Table 3.3: Sites and Policies document & Natura 2000 site conditions

Natura 2000 Sites	Relevant Condition Needed to Support Site Integrity
Peak District Moors (South Pennine Moors Phase 1) SPA Thorne and Hatfield Moors SPA	Protection of bird populations. Species with relevant sightings in Rotherham: Caprimulgus europaeus (nightjar) Circus cyaneus (hen harrier) Pluvialis apricaria subsp. apricaria (southern golden plover) Pluvialis apricaria subsp. altifrons (northern golden plover) Falco columbarius (merlin) Pluvialis apricaria (golden plover)

In 2013, information on bird sighting locations from Rotherham's Biological Records Centre was mapped alongside the proposed residential and employment allocations, and proposed safeguarded land. Sighting locations and the broad patterns of bird distribution and activity are unlikely to have changed significantly since that time. Records date as far back as 1844 and vary in level of detail, and therefore only those which are a relatively reliable representation of the current situation were used (recognising that the result is still indicative and subject to annual and seasonal variation). This has been achieved by:

- A. filtering out data older than the year 2000, concentrating on data from 2008 to 2013;
- B. filtering out data with a grid reference of less than 1 km accuracy (i.e. data with 10 km grid square references was not used);
- C. checking references to locations against the grid references; and
- D. filtering out data with no bird count information.





Figure 2-A.12 in Appendix 2-A, Volume 2 presents the mapped bird data as described above. While data from the year 2000 onwards was applied, proposed allocations and safeguarded land were checked against pre-2000 data to identify any additional areas of potential interest.

The HRA Screening assessment is reported in Appendix 1-E, and resulted in the conclusion that the Sites and Policies document is not likely to significantly affect European nature conservation sites.

### 3.9 Assessing the implications of the Infrastructure Delivery Study (2012)

The Infrastructure Delivery Study (2012) identified a number of infrastructure requirements by settlement area in Rotherham. These were assessed as part of the IIA of the Core Strategy, and they have been taken into consideration within this IIA. Due to revisions to and increases in the Local Plan housing target in 2014 (reflected in the Core Strategy), there is a risk that additional infrastructure may be required in order to deliver sustainable development objectives. This risk has also been considered, by applying the steps described below.

Firstly, the infrastructure requirements identified in 2012 were matched to the IIA topic chapters covered within Volume 3 of this report, in terms of the issues which they themselves manage. For example, education requirements in the Infrastructure Delivery Study (2012) were summarised within Chapter 6 of Volume 3, Education and Skills, and transportation requirements were summarised within Chapter 8, Transport and Carbon Emissions.

The infrastructure requirements were identified for the following settlement areas:

- Aston/ Aughton/ Swallownest;
- Bramley Wickersley;
- Brampton / West Melton / Wath-upon-Dearne;
- Catcliffe / Treeton / Orgreave;
- Dinnington / Anston / Laughton Common;
- Maltby / Hellaby;
- Outlying settlements;
- Rotherham Town Centre;
- Rotherham Urban Area;
- Swinton / Kilnhurst;
- Thurcroft; and
- Wales / Kiveton Park.

Each infrastructure requirement was then considered for potential secondary effects on all IIA topics and specifically for each Rotherham settlement area. Information on potential secondary effects was taken from the IIA Addendum of Proposed Changes (2012) and repeated within Volume 3 of this report.

The potential opportunities and risks of the infrastructure requirements were identified within the topic chapters of Volume 3, Sub-section N.4 (where "N" stands for the Chapter, 3 - 16).

#### 3.10 Limitations and Uncertainties

Limitations and uncertainties encountered during the course of the IIA are identified below, under headings pertaining to the particular aspect of the assessment to which they apply.





#### 3.10.1 Evidence Base / Baseline

Every effort has been made to provide an accurate baseline review for the borough. It has been effective at providing an understanding of current issues, and there is generally enough information available to enable an informed and detailed appraisal. However, the following challenges and limitations were encountered:

- As the scope of the information required is wide, data has not been available for a number of indicators.
  Although it is preferable that the selection of indicators has data available, it is important that data does
  not dictate what is measured. Therefore, alternative indicators have been sought or potential indicators
  have been left in even where no data is currently available, to allow collection in due course.
- Consistency between data sources.
- Availability of historic data.
- Availability of up-to-date information.
- Due to the format of data or small numbers involved, it has not always been possible to analyse information in a way which optimises its value e.g. by geographic area or by different communities or groups. Examples include environmental data that is often collected at national or regional level cannot be collated at a more localised level; additionally, and the relatively small population of Black and Minority Ethnic (BME) groups in Rotherham, which makes it difficult to analyse data by different groups (e.g. on housing tenure).
- Rotherham is interlinked socially, economically and physically to adjacent areas and is part of a wider Sheffield City Region. Whilst trans-boundary issues are important and need to be considered in the appraisal process, it was not always possible to represent such complex issues in the baseline data collation.
- As the baseline situation in Rotherham is constantly evolving, data can quickly become out-of-date. This is also a limitation of the information contained in this Report.

IIA / SEA is based on a number of standard assumptions, which begin with the assumption that the legally enforced standards for protection of the environment are absolute, and for all intents and purposes, fully successful. Assumptions also include a standard set of typical development controls required by planning policy, and which are assumed to be universally applied to planning applications of all types. Appendix 2-F of Volume 2 includes typical construction hazards, and the common measures which are assumed to be in place as mitigation for construction impacts. It also includes an assessment of the residual probability of impacts. Any probability which is 'low' has generally not been considered to pose a risk of a significant effect.

IIA / SEA must also make assumptions about how the policies of the Sites and Policies document are implemented. Whilst this IIA assumes that all policy will be implemented to its practicable fullest (both as stated and equally upon each planning application), it recognises likely areas where (from experience) there tend to be 'trade-offs' of accepting negative impacts for the sake of the benefits of development. This is reflected in each assessment, and in the residual risks and opportunities identified.

#### 3.10.2 Site Options and the Site Selection Methodology

Inherent limitations in the baseline data that could be collected has resulted in a range of assumptions being made in the course of the IIA of the Sites and Policies document. These include:

- recreational pressure can take various forms and thus can equally harm all designated or other identified habitats;
- although it covers only primary schools, post offices, grocers / convenience stores and doctor's surgeries, Index of Multiple Deprivation (IMD) geographical barriers data is representative of a wider range of services and facilities likely to be in proximity to sites; and
- the presence of environmental or socio-economic constraints and the buffers around them are indicative
  of potential adverse effects, with buffers chosen based on professional judgment and standards /
  thresholds where these applied.





In addition, when considering the temporal aspect of effects, the delivery period of certain sites which have not been allocated as part of the Sites and Policies Document, or which have already been allocated and are still considered viable, is unknown. As a result, it has been necessary to assume that these will be delivered at a rate of around 1 dwelling per 1-2 weeks, or between 30 - 50 per year.

In the Site Selection Methodology there was a need to focus on reliable spatial data for IIA Objectives in order to conduct a meaningful and effective assessment for the 545 sites. This means that constraints were the focus, and this brought out potential negatives more than potential positives. Individual sites could have other attributes or prospects which make them perform better than indicated. To an extent, this has been taken into account in Stage 3, however decision-making has not relied solely upon site scores, as indicated in Volume 2, Chapter 4 for each settlement area.

#### **Biodiversity / Nature Conservation**

Protected species are animals and plants which receive protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010. Protected species information supplied as part of the Stage 2 assessment of sites under the Site Selection Methodology has been only a very minor contribution to the process. The assessments of protected species only cover a minority of the 545 sites for potential consideration for future development, but all of the sites which have been identified for potential allocation as part of the Sites and Policies Document have been surveyed for protected species.

Where no rating for protected species is given, this is not an indication that there is nothing of interest on the site, but rather that the site has not been investigated further at this stage. This has not had a significant impact on the overall IIA or selection of sites, as protected species alone are not sufficient justification for non-selection (or selection, in the case of sites with no protected species). It is generally accepted that project-level mitigation can adequately account for the protection of such species. Therefore, its use has been limited to being viewed alongside wider ecological interest, such as nature conservation designations within or near to sites.

The assessment of sites for biodiversity impact has also included an assessment of potential impact of any development on Local Wildlife Sites (LWS) (and any mitigation that may be required), Local Nature Reserves, ancient woodland and Candidate Local Nature Reserves, Candidate Local Wildlife Sites (cLWS), as well as a protected species assessment.

Future survey of sites for protected species will be gauged by need, including as determined by the current proposed allocations and safeguarded land and the results of consultation on the draft Sites and Policies document.

#### Material Assets / Infrastructure (Under 'Economy and Employment')

Water and sewage infrastructure constraints information supplied as part of the Stage 2 assessment of sites under the Site Selection Methodology has also been incomplete. However, there is information for the majority of the 545 sites for potential consideration for future development, with only 115 sites not yet assessed under this criterion. Future information-gathering will be gauged by need, including as determined by current proposed allocations and safeguarded land and the results of consultation on the draft Sites and Policies document. Yorkshire Water and Severn Trent Water have been consulted during the development of the Sites and Policies Document and have had the opportunity to comment. This consultation lead to a recommendation for a 400 m "cordon sanitaire" from all Sewage Treatment Works.

#### **Transport and Emissions**

Land Use and Transport Integration (LUTI) model information has been used in order to determine a site's relative accessibility to public transport, and have been updated by the South Yorkshire Passenger Transport Executive (SYPTE) in 2015 to provide scores for most of the sites. The LUTI information is not available for only three of the 545 sites. However, this criterion is only one component of overall site accessibility to services, facilities and employment, and decision-making has been carried out by planners knowledgeable of the public transport services of the borough who have taken any such gaps into account. The SYPTE has





also commented on all drafts of the Sites and Policies Document and have had the opportunity to comment on every site.

Information on highways access issues was also not available for 33 of the sites. Proxy information from adjoining sites has been used where possible, but where not possible, no rating has been provided (22 sites). However, for these sites, planning permission has been granted on-site and problems relating to highways access have been overcome with the grant of the planning permission.

#### Soil & Geology

The Agricultural Land Classification (ALC) classifies agricultural land into six categories (Grade 1, 2, 3a, 3b, 4, and 5). Grades 1, 2 and 3a are considered the 'best and most versatile' soils in the country, and are a strategic national resource. The data available at a strategic level only illustrates five grades that can be used for general guidance. It does not separate Grades 3a and 3b, but rather has them as a combined Grade 3. Therefore, Grade 3 land cannot be assumed to be 'best and most versatile', and only Grade 2 (as there is no Grade 1 soil in Rotherham) has been considered as a potential constraint to development for the purposes of informing site selection only.

#### Flood Risk

Rotherham Metropolitan Borough Council (RMBC) have undertaken a Flood Risk Sequential Assessment to demonstrate that the sites allocated through the Local Plan in areas at flood risk are appropriate in the context of the sequential and exception tests which are required as part of the National Planning Policy Framework (NPPF). The Sites and Policies Document – Flood Risk Sequential Assessment sets out the local flood risk context before describing how flood risk has been taken into account in the selection of sites for allocation. It identifies those sites partly or wholly within areas at higher risk of flooding and which sites require more detailed sequential testing in line with the national planning policy.

The report concludes that the overall site selection process has adhered to the principles of directing development to areas with the lowest risk of flooding. As a result, with the exception of a small number of sites RMBC have been able to allocate the vast majority of development in Flood Zone 1. In order to meet the borough's development requirements in accordance with the broader principles of sustainable development, it has been necessary to identify some sites in areas at higher risk from flooding. Where sites are proposed for allocation for development on land in Flood Zones 2 and 3, it has been demonstrated that the sequential approach outlined in the NPPF has been applied as necessary. It has shown that development can, in principle, be delivered appropriately in relation to flood risk. It is recognised that more detailed Flood Risk Assessments will remain a requirement of the planning application process for proposals on these sites. Policy CS25 will ensure that uses with higher vulnerability are located on parts of the site with the lowest probability of flooding.

#### **Historic Environment**

A further limitation to the assessment has been the unknown nature of buried archaeology. This is because the whereabouts of buried archaeology is unknown until an area is excavated. Therefore, it is hard to determine whether a development has the potential to have an adverse impact on this asset. A staged programme of archaeological work, including a desk-based assessment; archaeological monitoring of any geotechnical test pits; trial trenching of areas of proposed groundworks; or a controlled topsoil strip with archaeological monitoring and recording, is usually required in order to determine the magnitude of impact of a proposed development on unknown archaeological remains. This would typically be agreed with Historic England and the relevant local planning authority Archaeological Advisor.

The NPPF contains topic-based advice on heritage matters (Chapter 12: Conserving and enhancing the historic environment). A core principle of the NPPF is that heritage assets should be preserved in a manner appropriate to their significance. Where development will result in impacts on the significance of undesignated heritage assets, a balanced judgement should be made with regards to the scale of any harm or loss, and the significance of the asset. Where development will result in whole or partial loss of a heritage asset, developers should record and advance understanding of the significance of the heritage assets in a





manner proportionate to their importance and the impact. This evidence should then be made publicly accessible through deposit with an appropriate repository.





# 4. Legislative and Planning Context

### 4.1 Requirement and Scope

The Sites and Policies document and the IIA itself have been influenced by many different plans and programmes. This is recognised by the SEA Regulations, which require a review of relevant plans and programmes to be completed in the preparation of documents such as those included in the Local Plan:

'An outline of the contents and main objectives of the plan and programme, and of its relationships with other relevant plans and programmes' and 'The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation'.

(HMSO, 2004, Schedule 2 - Parts 1 and 5)

The first stage of completing the IIA is therefore to review relevant international, national, regional and local, policy guidance, plans and strategies to:

- ensure the documents making up the Local Plan and the IIA are in line with the requirements of legislation and national policy;
- maximise synergies between the Rotherham Local Plan and the IIA and other relevant plans and policies, and identify inconsistencies or constraints to be dealt with;
- · identify sustainability objectives, and key targets and indicators that should be reflected in the IIA; and
- provide baseline data.

### 4.2 Summary of the Review

A list of key international, national, regional and local documents (available as of the end of February 2013) was reviewed. The full list and the review can be found in Appendix C1 and Appendix C2 (respectively) of the SA Scoping Report.

The key links and themes identified can be broadly summarised into the following areas and categories:

- to protect the social and natural environment, spatial planning should aim to reduce greenhouse gas emissions and to prepare for the impacts of climate change;
- the importance of openness and fairness in decision-making, and the part assessments such as SA, SEA, HIA and EqIA play in providing high-quality information to the public;
- protecting and enhancing the historic and natural environment;
- sustainable consumption and use of natural resources, including water, waste prevention and recycling;
- choosing sustainable locations for development, including good walking / cycling access to local services and facilities, good public transport access, and making the most efficient use of the existing road network;
- the instrumental nature of housing and 'best practice' in spatial planning for urban renewal and tackling social and economic decline;
- protecting and enhancing open spaces, walking and cycling networks, and recreational opportunities;
- improving access to services and facilities, including healthy food, health services and essential amenities; and
- achieving economic prosperity.

In addition, some of the more specific messages for the Local Plan are:

• the need for more affordable housing with a mix of tenures to meet the needs of the existing population;





- the importance of prioritising the long-term improvement and prosperity of Rotherham Town Centre;
- prioritising the development of brownfield land;
- achieving high energy-efficiency and water-efficiency in development, and being sensitive to the water resource availability of the catchments in the borough;
- the need to address anticipated growth in waste production, and to treat different types of waste within accessible, urban locations close to where waste is generated;
- the need for development to support Rotherham's visitor economy;
- an opportunity to integrate with the South Yorkshire Green Infrastructure Strategy, provide sport and recreation facilities and reclaim derelict land; and
- to integrate biodiversity into development planning, alongside encouraging the involvement of residents in conservation and management.





## 5. Sustainability Baseline

### 5.1 Where baseline can be found in the IIA Report

As indicated in Sections 1.2 and 1.3, a key part of the IIA is the research, definition and application of the environmental, social and socio-economic baseline (or 'sustainability baseline'), which allows the IIA process to identify potential significant effects. The baseline was initially defined for each IIA topic and objective (see Section 3.3 for the topics and objectives) at a borough-wide level, and this was consulted upon with key stakeholders during the scoping stage. As part of an iterative IIA process alongside plan development, the baseline has also been defined for specific issues which have been considered and addressed by the IIA.

Specific detailed baseline information has been collected for each of the IIA topics (see Table 5.1 below). This information has been used as the basis for the assessment.

Table 5.1: Elements of sustainability baseline found in this IIA Report

Geographic Level and Nature of Baseline	Application / Purpose of Baseline	Where Found in the IIA Report
Borough-wide baseline by IIA Topic	Assessment of Sites and Policies document as a whole, including all sites and policies in combination.	Volume 3, Chapters 3 – 16, Section N.2 where N = the chapter number.
Site-specific baseline – candidate sites for potential allocation	The constraints-based assessment of each site as part of Stage 2 of the Site Selection Methodology	Volume 2, Chapter 4, Section 4.X.2, where X = sections 2-12 for each settlement area.  Volume 2, Appendix 2-D, Section 2-D.2 – SA of Individual Sites
	The 'in combination' assessment of sites for relevant settlements, which are Rotherham Urban Area and Dinnington.	Volume 2, Appendix 2-C, Sections 2-C.1.2 and 2-C.2.2.
Site-specific baseline – relevant designations, habitats and species sighting data	HRA Screening baseline	Appendix 1-E

Provided here is a summary of the sustainability baseline information, covering some of the key environmental, health and socio-economic / equality issues for Rotherham's Site and Policies document.

#### 5.2 Environmental baseline summary for the borough

Rotherham has large areas of high-quality countryside and open space. The borough is over 70% rural, with 10% of the borough covered by trees. Much of rural Rotherham is designated as an Area of High Landscape Value and as Green Belt. Rotherham lies within two National Character Areas: South Magnesian Limestone and Nottinghamshire and Derbyshire and Yorkshire Coalfield. The core areas of Wentworth Parklands and the Sandbeck Parklands, as well as the Coalfield Tributary Valleys Thrybergh sub-area, are considered to be the most sensitive landscapes in the borough (Rotherham MBC, 2010d).

Rotherham Town Centre has attractive pedestrianised areas and a Centenary Market, however it has suffered from a decline in trade over recent years. Past surveys show that perceptions of Rotherham Town Centre are generally poor, with 50% of survey respondents agreeing with the need to revive the town centre. Rotherham Renaissance has started to transform the town centre with a 25-year vision to provide new leisure, office, residential and public space schemes benefiting economic, environmental and social aspects of the town.





Loamy soils are prevalent in Rotherham. In the north and central areas of the borough the dominant soil type is slowly permeable seasonally wet acid loamy and clayey soils with low fertility. Moving to the south and south-east, the soils are freely draining, lime-rich loamy soils. Scattered areas in the north and central areas are freely draining, slightly acid loamy soils with low fertility. In addition, small areas in the southeast and north of Rotherham have loamy and clayey floodplain soils with naturally high groundwater and moderate fertility. There are also some sections of restored soils mostly from quarry and opencast spoil. These have low to moderate fertility (Defra, 2004). The majority of agricultural land in Rotherham is of Grade 3 quality (good to moderate), with substantial Grade 2 (very good) soils in the east of the borough.

No international biological designations are present in Rotherham. The closest outside of the borough is the South Pennine Moors SAC and SPA, the most local part of it being the Peak District. This is located to the west of Sheffield, over 10 km away. The next nearest site is Hatfield Moor SAC and SPA over 15 km to the northeast. There are four biological SSSIs and seven Local Nature Reserves (LNRs) present in the borough. Biological SSSIs include Roche Abbey Woodlands, Anston Stones Wood, Maltby Low Common and Lindrick Golf Course. As of 2010, 72.1% of Rotherham's SSSIs are considered to be in a favourable condition, 20.8% unfavourable but recovering and 7.2% in an unfavourable condition. In 2013, there were 94 LWSs in Rotherham, plus one candidate site.

There are six AQMAs in Rotherham as defined in the Air Quality Monitoring Report 2009. This number has reduced from seven in 2007 due to the Brampton Bierlow AQMA being revoked. The six AQMAs include three along the M1 corridor, one along the A630 Fitzwilliam Road, one along the A6021 Wellgate and one area which encompasses the A629 Wortley Road. Each of these AQMAs is declared for exceedences of the annual average Nitrogen Dioxide (NO<sub>2</sub>) limit.

Large decreases in Carbon dioxide equivalents (CO2e)⁵ were experienced in Rotherham between 2005 and 2007. This was largely due to reductions in emissions in the industrial and commercial sectors. Monitoring data shows that the industrial and commercial sector in Rotherham still produces the most CO2e per capita, followed by domestic sources and then road transport. Levels of CO2e emissions per capita have fallen across all sectors from 2005 to 2008. In 2005, total emissions per capita were 8.2, falling to 6.8 per capita in 2008 (AEA, 2010). Renewable energy installations are continuing to increase, with a number of wind turbines and biomass plants being granted permission or with applications currently under consideration which should help to meet medium- and long-term targets (RMBC, 2012b).

Rotherham's Level 1 Strategic Flood Risk Assessment has indicated that a proportion of the borough is at risk of flooding, including the neighbourhoods surrounding the Town Centre. The sources of flooding include river flooding, localised runoff, sewer and ground flooding. Rotherham wetlands are currently being restored and this will result in a more natural inundation regime in the wetlands, creating ecological enhancement and reducing the flood risk for both Rotherham and Doncaster (Environment Agency, 2009).

Rotherham produces over 115,000 tonnes of household waste per year. In 2011/12, 29.5% of municipal waste was sent to landfill. Over the same period, 49.6% of waste was reused, recycled or composted, representing an increase from 2009/10 (RMBC, 2012b). The Rotherham Waste Strategy 2005 - 2020 sets out a target recycling rate of 45% by 2015. It further sets out that by 2020, biodegradable municipal waste disposal to landfill will be reduced to 35% of that produced in 2005 (Rotherham Metropolitan Borough Council, 2005). In Rotherham there are several recycling locations, including 54 'bring sites' across the borough, and four household waste recycling centres.

The South Yorkshire region has significant geological resources including limestone, sand and gravel, coal, clay, peat, gas, coal mine methane and oil. There are also solid geological deposits of Sherwood Sandstone and Limestone within Doncaster and Rotherham which from a major aquifer that is used to meet part of Doncaster's and Rotherham's water needs.

The quality of rivers in Rotherham has improved greatly since 1990, when only 44% of Rotherham's rivers were classed as fair or good. A large proportion of the rivers however are still only of moderate ecological

<sup>&</sup>lt;sup>5</sup> CO2e is the amount of greenhouse gases in total (including other types of greenhouse gas such as methane, nitrogen dioxide and sulphur hexafluoride) as converted to the equivalent amount of CO2 (in terms of global warming potential).

<sup>&</sup>lt;sup>6</sup> Geological resources provide the raw materials for buildings, industry, infrastructure, medicines, cosmetics, fuel and water.





potential and several fail for their chemical status (Environment Agency, 2011). The poor water quality in Rotherham is in part due to the legacy left behind from mining, which has led to contamination and rising mine waters (Environment Agency, 2009). Groundwater areas include the Don and Rother Millstone grit and Coal Measures covering much of Rotherham and Idle Torne – Magnesian Limestone found in the east of the borough. Both these groundwater areas are of good quantitative quality, but poor chemical quality.

Rotherham sits mainly within the Don and Rother and Idle and Torne catchments. The relevant management units within the Don and Rother catchment show that water is likely available for abstraction year-round. However, in the relevant management units of the Idle and Torne (generally east of the M18), water is not available, and is over-licensed east of Maltby, and near Dinnington, Anston and Kiveton.

There are 37 Scheduled Monuments, 523 Listed Buildings (16 of which are identified as Grade I, 38 are Grade II\* and 469 are Grade II) and 5 Registered Parks and Gardens within Rotherham (English Heritage, 2011). The five Registered Parks and Gardens are: Boston Park; Clifton Park, Rotherham; Moorgate Cemetery; Sandbeck Park and Roche Abbey; and Wentworth Woodhouse. There are 28 Conservation Areas, including two new designations at Ulley and Letwell. They are designated by RMBC as areas of special architectural or historic interest whose character or appearance should be preserved or enhanced. Conservation Areas include Rotherham Town Centre, Doncaster Road, Wentworth and Thorpe Hesley (Rotherham MBC, 2011b).

#### 5.3 Health baseline summary for the borough

Life expectancy at birth for males is identified by the Office for National Statistics as 76.6 and for females 80.7, both slightly lower than the national average (ONS, 2013). This is largely due to lifestyle, diet and history of occupational illnesses from mining and heavy industry; however this has improved in recent years, narrowing the gap to the national average.

The 2011 Census identifies 77.1% of the population as in good or very good health (roughly 3% below the national average), 15.3% as in fairly good health and 7.6% in not good health (ONS, 2013). The proportion of people within Rotherham considered having a limiting long-term illness or disability stands at 22% (2011 Census). This is greater than the national average (18.8%). One in eight people in Rotherham (31,000 in total) are carers, with 67% being women and 33% men.

Binge drinking and drug use in Rotherham is significantly higher than the national average. The proportion of adults binge drinking is 21.7%, 3.7% higher than the national average and the proportion of drug misuse is 13.1%, 3.3% higher than the national average.

There are numerous accessible greenspaces across Rotherham which support sport and informal outdoor recreation, including formal parks and gardens, natural greenspaces, outdoor sports facilities and amenity areas. Fifty-five parks and gardens were identified by the 2010 Greenspace Strategy, and include Rother Valley Country Park, Ulley Country Park, Thrybergh Country Park, Wath-upon-Dearne Community Park, Manvers Lake and surrounds, Newhill Park, Bradgate Park, Ferham Park and Victoria Park. Forty-six outdoor sports areas were also identified, including Rawmarsh Leisure Centre, Herringthorpe Playing Fields and Brampton Sports Centre (RMBC, 2010c).

#### 5.4 Socio-economic / equality baseline summary for the borough

Rotherham has a population of approximately 257,280 (ONS, 2013), which is expected to increase by 6% by 2018. In common with the rest of the UK, Rotherham has an aging population, with the number of people aged 60 and over being similar to the number of children under 16. The number of people over 65 is predicted to increase by over 33% by 2025.

In 2009, Rotherham's BME population was 8.1%, which is below the national average of 20.2%. The current non-white population is 6.1% of the total population, and population projections predict it will increase to 6.3% of the total population by 2030. The gender distribution in Rotherham is similar to the national profile, with 51% females and 49% males.





Rotherham is at the geographical centre of the Sheffield City Region. It has strong cross border connections with adjoining areas, particularly Sheffield to the west and Doncaster to the east. Much of the strategic road network that serves Rotherham is congested and several major schemes have been implemented to increase the capacity of the motorway network. The local road network in the centre of Rotherham also experiences delays and congestion, particularly in Rotherham town centre. It is thought that Rotherham's bus network will be able to accommodate future predicted growth; however, key routes are often adversely affected by congestion on the highway network, which impacts journey times and reliability. There is a need to maintain attractive bus journey times even as the levels of congestion on the highway network rise.

Across the borough as a whole, 30% of the population do not have access to a car, and some settlements and neighbourhoods have even lower levels of car ownership which means that the public transport network is important to facilitate access to services and employment opportunities.

Rotherham is following the national trend with an increasing number of one-person households, with a decreasing average household size (down from 2.37 currently to 2.20 by 2026). This will have implications for future housing requirements in the borough. A further source of pressure on housing requirements may come from increased migration into Rotherham to take advantage of any increases in local job opportunities, and/or to take advantage of relatively low house prices.

Attainment at school and the number of young adults remaining in education and training has improved in Rotherham over recent years. The numbers of young people going on to further and higher education increased by 3.7% between 2002 and 2007 (Rotherham BC, 2008b). In 2010, 6.6% of all 16-17 year olds in Rotherham were not in employment, education or training. This had dropped from just under 11% in 2006 (NHS Rotherham, 2011). There are 98 primary schools and 16 secondary schools. In a few locations there is surplus secondary capacity to accommodate growth, however some highly popular secondary schools are stretched at present, and any future demand increases will need to be carefully planned in advance of the requirement (RMBC, 2012a).

The number of residents with skills at national vocational qualification (NVQ) Level 2 or above is approximately 7% lower than the national average, however the percentage is improving year-on-year at the same rate as the nation (if not faster) (NHS Rotherham, 2011). There is a skills gap in Rotherham, particularly in terms of the existing skills of the population and those required by potential employers. There is also low graduate retention. Within the borough, 18% of the population are graduates and 18% have no qualifications, but the situation is improving.

The proportion of Rotherham's working population employed in manufacturing and construction is higher than the national average, and those employed in financial and business sectors in Rotherham is lower than the national average. According to the Local Economic Assessment for Rotherham (2010), manufacturing (production) and construction sectors account for almost 23% of businesses compared to 19.3% regionally and only 17.3% nationally. There is also an over-representation of businesses in the public sector industries – 10.6% in Rotherham compared to 9.3% regionally and 8.7% nationally. Rotherham has historically had a low business to population ratio and this has remained the case despite significant improvements over recent years.

The employment rate has improved significantly in Rotherham but is still around 3% below the national average. Some parts of the borough have a high unemployment rate and a high proportion of benefit claimants. This is particularly apparent in neighbourhoods close to Rotherham Town Centre. Unemployment showed a strong improvement up to 2005 but rose from 5.8% in 2008 to 9.1% by 2009 as the recession took effect.

As well as geographical disparities, there are also disparities between different groups in Rotherham. The female employment rate in Rotherham is closer to the national average than for men, but women are far more likely to be working part-time than men. The estimated employment rate for ethnic minorities in Rotherham, using June 2009 data, shows a gap of over 10% as compared to the 'white' employment rate (Rotherham Metropolitan Borough Council, 2010a).





# **Appendix 1-A** Changes to Sites and Policies document

### 1-A.1 Summary of changes to the plan between 2013 and 2014

The following table summarises the changes made to the Sites and Policies document between 2013 and 2014, and whether each change required additional assessment under the IIA, or otherwise necessitated changes to the IIA Report.

Policy No. (2014)	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2014?	
	Bassingthorpe Farm proposed as a Strategic Allocation in the adopted Core Strategy, removing these sites from consideration as alternatives in the Sites and Policies document	Yes – the assessments of these sites were unchanged, but the IIA was updated to reflect	
N/A	29 new sites identified (including expansion on previous sites)	the new preferred sites and therefore amended residual sustainability considerations (constraints and opportunities) for	
	22 sites removed from selection as a result of consultation comments and further assessment	consideration when implementing the Local Plan.	
	4 sites reduced in size within the previously identified boundary		
SP1	New Policy: General Principles	No	
SP2	Text changes as additions.	No	
SP3	No Change	No	
SP4	Rewording of paragraph	No	
SP5	Text added	The change affected any proposals which involve the loss of a building that currently makes a positive contribution to the surrounding landscape character.  Positively affects the IIA – additional mitigating policy.	
SP6	New Policy: New Agricultural or Forestry Buildings or Structures in the Green Belt	New policy which was considered within a revised assessment, though it largely clarified / reinforced existing policy for a specific type of development.	
SP7	First sentence reworded	No	
SP8	Rewording of sentence and addition of new text.	No	
SP9	Text added	No	
SP10	Text removed	Yes – the removal of phasing of developments. Required consideration.	
SP11	Text added	No	
SP12	Text changes	No	
SP13	Text removed	Consideration was given to the relaxing of controls on this type of land use change, positive and negative.	
SP14	Change to Use Class Numbers.	No	





Policy No. (2014)	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2014?
SP15	Change to Use Class Numbers.	No
SP16	Update to referenced Policy numbering Text changes.	No
SP17	No change	No
SP18	Text added	No
SP19	New Policy added: Former Maltby Colliery	New policy which may influence the assessment, though to an extent it seems to reinforce existing policy for a specific location.
SP20	New Policy – Todwick North	New policy to assess and new sites reflected in IIA of sites as part of site selection methodology.
SP21	No change	No
SP22	SP 19 Main Shopping Areas was merged with SP 18 Development Within Town, District and Local Centres Text added	No – the effects of these policies were not considered to have changed via the merger.
SP23	Change in text	No.
SP24	Text added	No.
SP25	Change in text	No
SP26	Policy revised: Out-of-Centre Retail Parks and Other Out of Centre Developments	No
SP27	Revision of the policy	No
SP28	No change	No
SP29	No change	No
SP30	No change	No
SP31	Text added, changes in bold	No
SP32	No change	No
SP33	Policy was rephrased	No
SP34	Policy was rephrased.	No.
SP35	Statutorily Protected Sites and Non Statutorily Protected Sites and Areas have been merged into a single policy.	No
SP36	Slight change to text	No
SP37	Change in text	No
SP38	Change in the requirement for providing additional green spaces	No.
SP39	No significant change	No.





Policy No. (2014)	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2014?
SP41	Rephrasing of principles Added text	No.
SP42	Text was rephrased	No
SP43	Text rephrased	No
SP44	New Policy – Understanding and Recording the Historic Environment	No
SP45	Rephrasing of principles Added text, change in bold The Council will seek to ensure the protection and appropriate enhancement of the Borough's historic parks and gardens.	No
SP46	Very slight rewording	No
SP47	Slight change in phrasing	No
SP48	Text added	No
SP49	Rephrasing of sections of the policy Removal of certain text	No
SP50	Text added	No.
SP51	New policy – Exploration and Appraisal of Onshore Oil and Gas	New policy which required assessment.
SP52	New policy – Onshore Oil and Gas Production Facilities and Ancillary Development	New policy which required assessment.
SP53	Rephrasing of policy Text added	No.
SP54	Rephrasing of policy Text added	No.
SP55	Rephrasing of sections of the policy. Addition of text	No.
SP56	Rephrasing o the criteria	No.
SP57	Rephrasing of policy	No.
SP58	Rephrasing of some sections of the policy	No
SP59	No change	No
SP60	Historic parks and gardens added to list of aspects which development cannot have an unacceptable effect on.	No
SP61	Text added.	No
SP62	Exceptions for permitting the redevelopment or change of use of public houses have been revised.	No
SP63	No change	No
SP64	Text removed	No





## 1-A.2 Summary of changes to the plan between 2014 and 2015

Policy No. (2015)	Policy No. (2014)	Policy Name	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2015?
			Addition of a new potential site for consideration	Yes – with the exception of
			Five changes in residential allocations (one site added, 4 removed)	the new site, the assessments of these sites are unchanged,
		N/A	Seven changes in employment allocations (four sites removed, three added which were formerly 'potential employment allocations')	but the IIA has been updated to reflect the new preferred sites and therefore amended residual sustainability considerations (constraints
			Two other sites removed from potential employment allocations and safeguarded residential land	and opportunities) for consideration when implementing the Local Plan.
			Four site boundary changes	
1	NEW		New policy setting out which sites are allocated for development to meet objectively assessed needs	No
2	1	Green Belt - General Principles	Title change Additional references in relation to minerals Clarified that a Green Belt will be applied within Rotherham	No
3	2	Rural Workers Dwellings in the Green Belt	Last sentence amended to clarify that it could apply to other buildings, not just farm buildings	No
4	3	Extensions to Buildings in the Green Belt	Amended to include the reference to over 33% increase in volume being disproportionate	No
5	4	Alternative Uses for Buildings within the Green Belt	Amended wording in relation to safeguarding and conserving the historic, architectural, natural history, or landscape value of heritage assets	No
6	5	Replacement Buildings in the Green Belt	Minor typo correction	N/A
7	6	New Agricultural or Forestry Buildings or Structures in the Green Belt	None	N/A
8	7	Infilling Development within the Green Belt	List Green Belt villages within policy	No
9	8	Previously Developed Sites within the Green Belt	None	N/A





Policy No. (2015)	Policy No. (2014)	Policy Name	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2015?
10	9	Proposals for Outdoor Sport, Outdoor Recreation and Cemeteries in the Green Belt.	Minor typo correction	N/A
11	10	Five-Year Housing Supply	Title change	N/A
12	11	Development in Housing Areas	Title change  Deleted reference to existing or undeveloped allocations, to clarify that the policy applies to all housing areas (ie housing development sites and areas 'washed over' as residential)	No
			Amended criteria a to be clear that it refers to ancillary and complementary uses  Deleted criteria d as proposals need to	
			satisfy all other relevant planning policies anyway	
13	12	Development on Residential Gardens	None	N/A
14	13	Gypsy and Traveller Sites	Reworded criterion a to improve clarity Amended criterion e to clarify that development in flood zone 3 will not be acceptable	No
15	14	Land Identified for Business Use	None	N/A
16	15	Land Identified for Industrial and Business Uses	Deleted reference to C1 hotels being an unacceptable use	No
17	16	Other Uses Within Business, and Industrial and Business Areas	Deleted reference to C1 hotels being an unacceptable use	No
18	17	Industrial and Business Development in Relation to Sensitive Areas of Land- use	Deleted reference to occupied housing in the policy text Replaced 'amenities' with 'amenity'	No
19	18	Waverley Advanced Manufacturing Park	Small amendment to criteria a. to refer to supporting the activities of the AMP Added site allocation reference number for clarity	No





Policy No. (2015)	Policy No. (2014)	Policy Name	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2015?
20	19	Former Maltby Colliery	Clarified B2 uses within criterion a Criteria b amended to refer specifically to waste and energy uses New criteria c added allowing use as an aggregate depot (linked to the site being a mineral safeguarding site) Added site allocation reference number for clarity	No
21	20	Todwick North	Added clarification that B8 uses will only be acceptable where they are ancillary to the main proposed use Added clarification that up to 25% of the site will be acceptable for B8 uses Added site allocation reference number for clarity	No
	21	Tourism and Visitor Developments	Policy deleted as it did not add anything to that which other policies already cover	Yes
22	22	Development Within Town, District and Local Centres	None	N/A
23	23	Primary shopping frontages	Target for A1 uses reduced from 70% to 65%  Criteria regarding concentrations of non-A1 use deleted  Policy wording and supporting text clarified to make clear that applicants will be required to demonstrate compliance with criteria through up to date survey data  Clarified that the final paragraph of policy refers to ground floor units	No
24	24	Secondary Shopping Frontages	Target for A1 uses raised from 25% to 30%  Policy wording and supporting text clarified to make clear that applicants will be required to demonstrate compliance with criteria through up to date survey data  Clarified that the final paragraph of policy refers to ground floor units	No





Policy No. (2015)	Policy No. (2014)	Policy Name	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2015?
25	25	Hot Food Takeaways	Amended criteria a to refer to the 10% threshold applying to town and district centres Inserted new criteria b to refer to a 25% threshold for local centres Deleted criteria c regarding non-A5 units between takeaways Clarified that criteria e and f apply to A5 uses and A3 restaurants with takeaway facilities Clarified how the 800, distance will be measured Clarified that outside of centres more than 2 adjacent A5 uses will not be permitted	No
26	26	Out-of-Centre Retail Parks and Other Out of Centre Developments	None	N/A
27	NEW	Rotherham town centre regeneration	Sets out uses which will be encouraged on particular sites within the town centre	Yes
28	NEW	Rotherham Town Centre Evening Economy	Supports the evening economy in Rotherham, and in particular sets out the areas in which late night uses will be encouraged	Yes
29	27	Sustainable transport for development	Criteria c amended to reflect the fact that development may provide mitigation measures which enable the highway network to cope	No
30	28	Development affecting designated "Highways Development Control Lines"	None	N/A
31	29	Development affecting Key Routes and the Strategic Road Network	None	N/A
32	30	Delivering Transport Schemes	None	N/A
33	31	Motorway Service Areas	Provided additional clarity regarding acceptable uses within motorway service areas	No
34	32	Canals	Remove references to 'wherever feasible' Included criteria to provide greater guidance regarding developments adjacent to canals	No





Policy No. (2015)	Policy No. (2014)	Policy Name	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2015?
35	33	Green Infrastructure and Landscape	Reworded to simplify and clarify what is required, and reduce overlap with Core Strategy policy Criteria a deleted and replaced with reference to considering the location and function of green space Criteria g amended to refer to 'suitable' mitigation, consistent with criteria f., and to refer to 'appropriate' rather than 'adequate' off site compensation Criteria j deleted and replaced with reference to creation and enhancement of green space Added reference to disused quarries in criteria k Minor typo correction to criteria n Added reference to native species in criteria q Added clarification that policy should be read in conjunction with Core Strategy Policy CS19	No
36	34	Conserving the natural environment	Last paragraph amended to refer to TPOs being declared with regard to amenity, rather than visual amenity	No
37	35	Sites Protected for Nature Conservation	None	N/A
38	36	Protected and Priority Species	First sentence reworded for clarity and to refer to demonstrating the need for development in that location, rather than an over-riding need.	No
39	37	Soil Resources	Amended 3 <sup>rd</sup> paragraph to refer to development proposed rather than permitted	No
40	38	New and Improvements to Existing Green Space	Criteria a reworded for clarity Criteria c moved to be new criteria b Criteria d part (i) amended to require maintenance for the lifetime of the development (previously maintenance was for 30 years)	Yes





Policy No. (2015)	Policy No. (2014)	Policy Name	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2015?
41	39	Protecting Green Space	Minor text changes for clarity  Deleted reference to sports pitches and play areas in first sentence as these are included in green space definition  Clarification that green space will only be lost in exceptional circumstances  Clarified what any assessment of green spaces should cover  Clarified that land performing an amenity / buffer function (as opposed to a recreational one) will be protected from development  Clarified that the policy also applies to	No
			new green space provided following plan adoption (and therefore not shown on policies map)	
42	40	Design and Location of Green Space, Sport and Recreation	Minor typo corrections	N/A
43	41	Listed Buildings	Minor amendment to clarify first sentence	No
44	42	Conservation Areas	Policy re-titled to 'Conservation Areas' New paragraph added around the requirements for notifying the LPA of works to non-TPO trees within conservation areas	No
45	43	Archaeology and Scheduled Ancient Monuments	Minor amendment to clarify first sentence Updated policy cross reference	No
46	44	Understanding and Recording the Historic Environment	Minor amendment to criterion b for clarity additional study reference number to add in to criteria a if we have it Also give consideration to whether we can add site mapping to mapper / community map to aid DM / developers Policy re-worded to improve clarity	No
47	45	Historic Parks, Gardens and Landscapes	None	N/A
48	46	Locally Listed Buildings	None	N/A
49	47	War Memorials	Policy amended to refer to proposals impacting upon war memorials or their setting	No





Policy No. (2015)	Policy No. (2014)	Policy Name	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2015?
50	48	Understanding and managing flood risk and drainage	Amendment to first paragraph to improve clarity Removed reference to Local Lead Flood Authority introducing SuDS approval body Paragraphs regarding maintenance strips and foul water disposal reworded to improve clarity Added reference to major developments complying with Defra and local sustainable drainage standards Added reference to floor levels in	No
			habitable buildings Added reference to development involving a loss of flood storage capacity being required to provide compensatory provision elsewhere	
51	49	Assessment of Mineral Extraction Proposals	Reference to landscape character and heritage assets added to critera c	No
52	50	Safeguarding Mineral Infrastructure	Additional reference to clarify 'in the vicinity of' – ie 250m Additional reference to safeguarding existing, planned or potential mineral infrastructure sites	No
53	51	Exploration and Appraisal of Hydrocarbons	Minor amends to title and policy wording to use correct terminology	No
54	52	Hydrocarbon Production Facilities and Ancillary Development	Minor amends to title and policy wording to use correct terminology	No
55	53	Pollution Control	Policy split in to two: this retained to cover pollution control and a new one on hazardous installations Second sentence of criteria b deleted as considered unnecessary Second paragraph and criteria e and f moved to new policy Final paragraph moved to form a new criteria e	No
56	NEW	Hazardous Installations	New policy resulting from splitting the existing Pollution Control and Hazardous Installations policy (see above)	No
57	54	Contaminated and Unstable Land	None	N/A





Policy No. (2015)	Policy No. (2014)	Policy Name	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2015?
58	55	Design Principles	Additional reference to considerations being, proportionate to the scale, nature, location and sensitivity of development Reference to building for life toolkit moved from SP56  Additional wording added to criteria h for clarity	No
59	56	Car Parking Layout	Policy title changed (from Housing Standards) Part 1 inc criteria a to d deleted. Criteria e to g moved to supporting text of SP58 (principles covered in SP58) Car parking layout section retained and amended to remove reference to just residential layouts	No
60	57	Sustainable Construction and Wind Energy	Sustainable Construction element now numbered part 1  First paragraph amended to refer to responding to climate change and the evidence required to support planning applications  Criteria a amended to require applicants to demonstrate use of recycled materials (subject to viability)  Deleted criteria b as duplicates waste plan policy  Deleted criteria c as duplicates soils policy amended criteria d to refer to allow noncompliance where it can be demonstrated not feasible or viable amended criteria e to require applicants to demonstrate use of renewable and low carbon technologies (subject to viability)  Added clarification that the policy should be read in conjunction with waste plan policy WCS7 and SP39  New part 2 relating to Wind Energy added – includes criteria relating to applications for wind turbines (refers to Area of Search which will be designated on the Policies Map)	Yes
61	58	Shop Front Design	Criteria g amended to delete reference to a specific door recess depth and refer to an appropriate depth	No
62	59	Advertisements	Second sentence amended to delete the words in brackets, which set out various types of advertisements (this wording moved to explanatory text)	No





Policy No. (2015)	Policy No. (2014)	Policy Name	Description of Change	Did it require changes to, or additional assessment under, the IIA in 2015?
63	60	Telecommunications	Additional paragraph added indicating support for expansion of telecomm networks and Minor amendments to improve clarity to criteria b	No
64	61	Safeguarding Community Facilities	Deleted references to 'wherever possible'	No
65	62	Loss of Public Houses	Corrected typos Combined criteria c and d into one Additional new criteria d which refers to a defined need for a public house Clarified that all criteria should be complied with	No
66	63	Access to Community Facilities	Amended to clarify that majority of homes is interpreted as minimum 80%; also clarified that reasonable walking distance is interpreted as 800m	No
67	64	Development Within Mixed Use Areas	Minor wording changes for clarity Additional reference to considering other uses on their merits Amended table to delete final column title 'sui generis' and replace with 'Other' Amended table to clarify that acceptable uses in MU14 are set out in Policy SP33 Amended table to include new MU20 (parkgate) and MU21 highfield commercial at Waverley, and to refer to policies which provide more detail on acceptable uses	No
68	NEW	Mixed Use Area 20: Land between Aldwarke Lane and Parkgate Shopping Park	New policy setting out acceptable uses at this site at Parkgate	No
69	NEW	Mixed Use Area 21: Highfield Commercial	New policy setting out acceptable uses at this site at Highfield Commercial, Waverley	No
70	NEW	Utilities Infrastructure	clarify policy around provision of utilities infrastructure	No

**JACOBS** 

Monitoring



## Appendix 1-B Stages of IIA

SA / SEA – Sustainability Appraisal / Strategic Environmental Assessment

HIA - Health Impact Assessment

EqIA - Equalities Impact Assessment

HRA - Habitats Regulations Assessment

Key Step for SA / **Key Step for HRA** Description SEA, HIA and EqIA We gather information in order to identify important Gathering environmental, social and socio-economic issues and **Evidence Scoping** decide on the scope of the assessment. This allows us to identify opportunities to help improve society and the environment, as well as features and conditions which are sensitive to change and could be negatively affected by the Sites and Policies document. Liaison with We agree this with the statutory bodies in liaison with key **Natural England** Consultation stakeholders. We obtain additional useful information from (as needed) them, where possible. We identify the likely significant effects of the different options Informing the considered for the Sites and Policies document so that the best **Assessment** options can be identified, though sometimes the theoretically best option(s) cannot be taken forward due to new discoveries В. about technical feasibility or other considerations. **Assessment** Screening of sometimes suggest alternative options and often develop **Preferred Options** mitigation measures to reduce negative effects and increase positive ones. We try to make the Sites and Policies document C. as sustainable as possible. Reporting **Consult Natural** Under the HRA, we work with Natural England to ensure that **England** no preferred option will negatively affect a European nature conservation site (SPA, SAC or Ramsar site). Appropriate Assessment may not be required, and the HRA **Appropriate** may end once Natural England is consulted on the Screening **Assessment** stage. **Consult Natural** D. We engage with the statutory bodies again, and with the Consultation **England** public and other key stakeholders in order to both inform them of the work done and the results, and also obtain any comments or further information. We take these comments E. into account when the Sites and Policies document is **Final Changes to** Appraise signific't finalised. Once adopted, we write a public document on the Strategy changes how the assessment and consultation influenced the Sites and Policies document. Post-Adoption / Integrity of SPAs, We monitor the effects of the Sites and Policies document. **SEA Statement SACs and Ramsar** We use this information in order to confirm that mitigation measures are working, and to better inform future Sites and Sites maintained

Policies documents and other LDDs.





# Appendix 1-C Full IIA (SA) Framework / Objectives

SA Topic	Ref No.	SA Objective	Guiding Questions	Broad Sustainability Indicators (not necessarily for Local Plan monitoring)
1. Population and Equality	1	Enables and enhances equality (including decent, affordable housing for all) and tackles prejudice and discrimination.	Will it avoid negative impacts on different groups of people because of their race, gender, disability, religion, sexuality or age? Will it promote equality directly or indirectly optimising positive impacts? Will it enable the involvement of all affected parties including hard to reach groups, and ensure consultation takes place to identify the positive or negative impacts on different groups? Will it provide services and facilities that are appropriate to the needs of different groups or communities? Will it be enable access for all? Will it provide monitoring to ensure all community groups are able to participate and benefit proportionally and fairly?	Number of racial incidents per 100,000 population (RMBC) Percentage of top 5% earners in RMBC that are women (RMBC) Percentage of top 5% earners in RMBC from BME communities (RMBC) Percentage of top paid 5% of RMBC staff who have a disability (RMBC)
2. Health and Well-Being	2A	Improve the health of the people of Rotherham, reduce disparities in health and encourage healthy living for all.	Will it help ensure there is adequate provision of easily accessible services appropriate to local needs? Will it help address causes of ill health? e.g. poverty, social exclusion, poor housing and work conditions, underparticipation in health services by specific groups or communities. Will it reduce inequalities in health and help target Neighbourhood Renewal Strategy areas? Will it encourage healthy lifestyles and prevent ill health? e.g. increasing access to green infrastructure, reducing car use, providing new facilities for and maintaining or enhancing access to physical sports, greenspace, recreation and cultural facilities, quality food retailers and a good work/life balance. Will it minimise risks associated with air and noise pollution or road accidents? Suitability of the local road network for cycling. Proximity to other main settlements – 5km is considered a reasonable distance for cycling.	Super Output Areas in Rotherham which are within 10% most deprived SOAs nationally for health (ONS Index of Multiple Deprivation) Number of under 18 conceptions (Rotherham PCT) Life expectancy (DH) Mortality by type (e.g. cancer, coronary heart disease etc) – (1) Community Strategy target reduce the mortality rate from coronary heart disease and stroke per 100,000 pop under 75. (2) Reduce mortality rate from malignant cancer per 100,000 pop under 75. (DH) Adult smoking rate (Community Strategy) (Rotherham PCT) Adult obesity (Rotherham PCT) Number of adults participating in regular exercise (3x30 minute sessions per week) (Rotherham PCT) Number of people eating fresh fruit, fresh or frozen vegetables or salad every day





SA Topic	Ref No.	SA Objective	Guiding Questions	Broad Sustainability Indicators (not necessarily for Local Plan monitoring)
				(Rotherham PCT)
	2B	Improve access to quality cultural, leisure and recreational activities available to everyone.	Will it maintain or increase the type or quality of facilities in areas where there is need? Will it enable non-car based access? Will it utilise the potential of Rotherham's greenspace and natural areas, enabling everyone to have easy access to quality areas? Will it improve and extend the public rights of way and green infrastructure corridors network by providing recreation for walkers, cyclists and riders? Will it promote Rotherham's facilities to local people and tourists encouraging participation by all? Proximity to natural greenspace. Proximity to cultural and leisure facilities. Proximity to recreational facilities. Ability to support new facilities.	Number of visits to or usage of museums per 1,000 population (RMBC) Number of day visitors to Rotherham (RMBC) Percentage of residents within English Nature's recommended distance from nearest greenspace (RMBC) Lengths of new Public Rights of Way Swimming pools and other visits per 1,000 population (RMBC) Area of recreational space - from Greenspace Audit: type/number/area (RMBC)
	2C	Enhance safety, and reduce crime and fear of crime for everyone.	Will it enhance safety, security and reduce crime or fear of crime (including hate crime) through design or other measures?  Will it help improve quality of life and address the causes of crime or anti social behaviour?  Will it encourage respect for people and property?	Number of people killed or seriously injured on Rotherham's roads (RMBC) Domestic burglaries per 1,000 households. (South Yorkshire Police) Violent crimes per 1,000 population (South Yorkshire Police) Vehicle crimes per 1,000 population (South Yorkshire Police) Number of racial incidents per 100,000 population (South Yorkshire Police) Fear of crime (RMBC – survey)
	2D	Reduce the negative impact of noise on people and their surroundings	Will it reduce levels of noise on sensitive receptors?	
3. Accessibility / Community Facilities	3A	Build community cohesion, involvement and encourage a pride in the community.	Will it provide opportunities for communities and local groups to participate in decisions and local democracy and increase their ability to influence particularly at a local level?  Will it help build a sustainable voluntary and community sector which works jointly with statutory agencies to meet the needs of diverse communities?	





SA Topic	Ref No.	SA Objective	Guiding Questions	Broad Sustainability Indicators (not necessarily for Local Plan monitoring)
			Will it build better relations and encourage respect across communities and interests e.g. through communication or joint actions?  Will it enable people to celebrate social, cultural and community assets and encourage community pride?  Will it increase community capacity and confidence?  Will it avoid creating tensions or resentment between different communities?	
	3B	Enhance internal and external images and perceptions of Rotherham and make Rotherham a good place to live, work or visit.	Will it increase the aspirations of local people? Will it promote Rotherham as a good place which is inclusive and welcoming for all encourage people to live, work or visit Rotherham? Will it increase the levels of satisfaction at living in, working in or visiting Rotherham?	Percentage of residents who are satisfied with their area as a place to live. (RMBC – survey) Number of day visitors to Rotherham (RMBC) Number of new business start ups
4. Education / Skills	4A	Improve the level of education and skills for all, reducing disparities across Rotherham and strengthening its position regionally and nationally.	Will it invest in the next generation? Will it improve educational attainment and qualifications particularly in low performing neighbourhoods and other groups under represented in educational achievement? Will it increase accessibility and participation of vocational and non vocational education and training for all but particularly for groups of people with low levels of achievement? Will it provide or facilitate appropriate training to address the identified skills gap? Will it help increase confidence, self esteem, and aspirations to learn? Proximity to existing education facilities, primary, secondary, further and higher. Ability to support new facilities.	Number / percentage of pupils achieving 5+GCSEs at grades A* to C (DfES – RMBC) Number of 16-19 year olds in education, training or employment (Connexions SY) Number / percentage of working age adults achieving NVQ Level 2 or above (ONS Labour Force Survey) Number / percentage of working age adults achieving NVQ Level 3 or above (ONS Labour Force Survey) Percentage of working age people receiving job related training in the last 13 weeks (ONS Labour Force Survey) Number of visits to libraries (RMBC)
	48	Encourage creativity, innovation and the effective use of sound science and appropriate technology.	Will it support local and sub regional clusters? e.g. AMP (Advanced Manufacturing Park, Waverley) Will it encourage partnership working across sectors and organisations? Will it create places that encourage innovation? Will it enhance or enable the use of ICT, innovative or sustainable technologies? Is the location considered suitable/attractive for such uses? Skills profile of the local population?	Businesses with links to higher education / further education colleges Access to and usage of internet points in the Borough (RMBC) Percentage of businesses with IT / broadband access





	Ref			Broad Sustainability Indicators (not	
SA Topic	No.	SA Objective	Guiding Questions	necessarily for Local Plan monitoring)	
			Near direct access to strategic highway network? Attractive environment?		
	4C	Promote awareness of sustainable development and encourage sustainable lifestyles and business practices.	Will it increase knowledge and understanding of sustainable development? Will it encourage or enable people to live and work more sustainably? Will it ensure inward investment projects are sustainable? Will it promote sustainable design and construction? e.g. materials, clean technologies (such as Sustainable Drainage Systems - SuDS), whole life, fit for purpose, etc.	Number of new developments with green travel plans (RMBC) Number of new developments incorporating sustainable design features: use natural heat, energy, light and water efficiency. Number of new developments constructed in line with revised Part L of the building regulations (Conservation of fuel and power in dwellings – raises the performance of central heating boilers) (RMBC)	
5. Economy and Employment	5A	Enhance the provision of quality local or easily accessible employment opportunities for all in stable or competitive growth sectors.	Will it maintain or increase current employment rates in growth or stable sectors?  Will it increase the diversity of job opportunities?  Will it enable easy access to employment opportunities including by public transport?  Will it help reduce disparities in the labour market actively promoting real opportunities for people and neighbourhoods most in need and encourage representation of groups in non traditional industries?  Will it provide necessary support or services which enable people to go back to work? E.g. care support, crèche and training.  Will it encourage fair and decent work conditions and increase average salaries?  Could this location be suitable for and attractive to employment related uses?  Is this location accessible by public transport to other settlements that provide employment?	Total Employment (Office for National Statistics (ONS) Labour Force Survey). Average Gross Weekly Salary (ONS Annual Survey of Hours & Earnings). Employment Rate: By Gender (ONS Labour Force Survey). Employment Rate: By BME (ONS Labour Force Survey) Economic Inactivity (ONS Labour Force Survey) Number of new jobs created from inward investment (RMBC) Vacancy rate for commercial and industrial property (RMBC)	
	5B	Enhance conditions that enable sustainable economic growth and investment.	Will it support growth business sectors, Small and Medium Enterprises (SMEs) and the development of an enterprising culture, encouraging indigenous investment? Will it encourage diversity and reduce dependence on single or vulnerable economic activities? Will it help build, attract and retain a skilled workforce that meets existing and future needs? E.g. by developing the capacity of local people, tackling barriers to employment, and creating a place where people want to live or work.	Number of new business start-ups New businesses surviving 3 years plus (Small Business Service) Increase annually the net stock of VAT registered businesses (ONS NOMIS) Inward Investment Inquiries (RMBC) Amount / Area of allocated employment land immediately avaliable for development (RMBC)	





				Where Everyone Matters
SA Topic	Ref No.	SA Objective	Guiding Questions	Broad Sustainability Indicators (not necessarily for Local Plan monitoring)
			Will it build on existing successful clusters, initiatives,	Amount of employment land that is
			infrastructure and local assets?	constrained (RMBC)
			Will it help create confidence in Rotherham to encourage	Number of employment generating
			investors and employers to make a long term commitment?	developments granted permission that
				delivers significant environmental benefits
				e.g. habitat creation.
				Progression of Advanced Manufacturing
				Park, Waverley – Number of new
				companies located (RMBC)
	5C	Enhance the	Will it support or develop services and facilities appropriate to	Vacancy rate of Rotherham Town Centre
		function and	the community, function, character and scale of the centre and	premises (RMBC - survey)
		vibrancy of town or	existing facilities?	Vacancy rate of town centre premises
		district centres.	Will it help create an appropriate range of independent,	(across borough) (RMBC - survey)
			competitive and national retailers?	Foot flow in primary shopping streets of
			Will it help reduce the number of vacant properties?	Rotherham Town Centre (RMBC - survey)
			Will it support or create high-quality public realm and	Satisfaction with Rotherham Town Centre
			community/amenity space encouraging positive community	(RMBC - survey)
			interaction?	
			Will it encourage clean, safe neighbourhoods with minimal	
			pollution?	
			Will it create places where people of all backgrounds and	
			circumstances want to live, work or spend leisure time? Will it encourage a sense of place, ownership and pride?	
	5D	Protect and	will it encourage a sense of place, ownership and price?	
	30	improve		
		infrastructure		
		related to		
		communications		
		and the		
		management of		
		energy, solid waste		
		and wastewater		
6. Transport and	6A	Improve	Will it maintain or provide facilities, services and employment	Modal split, e.g. total journeys, by trip
Carbon		sustainable	in locations that reduce the need to travel or are accessible by	purpose (LTP data)
Emission		transport and	sustainable transport modes?	Mode of travel to school (RMBC)
		movement	Will it increase quality and affordable sustainable integrated	Mode of travel to work (2001 Census)
		patterns.	transport options particularly in areas of need and that are	Profile of where Rotherham's residents work
			accessible for the disabled? E.g. public or community	(2001 census)
			transport, car share, car clubs etc.	Number of people who live outside





SA Topic	Ref No.	SA Objective	Guiding Questions	Broad Sustainability Indicators (not necessarily for Local Plan monitoring)
			Will it make it more attractive for pedestrians and cycling? Will it secure the implementation of green travel plans? Will it encourage local supply chains? Proximity to facilities and services Ability to support facilities and services Proximity to public transport facilities	Rotherham, who come to Rotherham to work (2001 Census)
	6B	Reduce greenhouse gas emissions and increase the use of renewable energy.	Will it encourage the use of clean technologies? Will it reduce emissions by greenhouse gases and ozone depleters?	Greenhouse gas emissions by % of population CO² emissions by end user e.g. industry, domestic, transport.
7. Biodiversity	7	Enhance Rotherham's habitats and biodiversity.	Will it protect and enhance habitats and geological sites of national, regional, or local importance? e.g. woodland, waterbodies and river corridors, regionally Important Geological Sites (RIGS), meadows and brownfield sites of ecological value.  Will it protect and enhance national, regional or locally important terrestrial or aquatic species?  Will it maintain and enhance wildlife corridors and minimise fragmentation of ecological areas and greenspaces (including Green Infrastructure, Ecological Networks and Landscape Scale Conservation)?  Will it manage sites in a way that protects and enhances their nature conservation value?  Will it create new appropriate habitats, particularly in Biodiversity Opportunity Areas?  Proximity to Local Wildlife Sites (e.g. cats have a roaming range of up to1KM and could therefore create issues relating to predation).  There could be issues relating to recreational pressure, e.g. dog walkers but this will depend on the nature of the designation.  Presence and distribution of hedgerows and woodland within the development area. Note that at this stage we can't take their quality into account as this would require detailed survey work.  Scope for severance of habitat networks.	Land covered by environment stewardship schemes (RMBC) Change in areas and populations of biodiversity importance, including: i) change in priority habitats and species. ii) change in areas designated for their intrinsic environment value including sites of international, national, regional, subregional or local significance Percentage of the borough covered by woodland (South Yorkshire Forest Partnership) Number of locally designated wildlife sites. Number of SSSIs in the borough (English Nature) Number of LNRs in the borough (RMBC)
8. Air Quality	8	Reduce the negative impact of	Will it help achieve the objectives of Air Quality Management Plans?	Annual levels of particles and ozone. (RMBC)





SA Topic	Ref No.	SA Objective	Guiding Questions	Broad Sustainability Indicators (not necessarily for Local Plan monitoring)
		air pollution on people and the natural environment	Will it avoid proximity to existing sources of air pollution, e.g. industrial activity? Will it lead to the creation or improvement of green infrastructure and greenspace where it can benefit air quality?	Number / % Population living within Air Quality Management Areas. (RMBC)
9. Water resources	9A	Reduce the risk of water contamination and assist in meeting Water Framework Directive objectives.	Will it tackle key issues in Rotherham such as improving water quality and help meet Water Framework Directive objectives? Will it implement measures to improve water bodies that are already failing WFD standards?	River quality (Environment Agency) Condition of surface water and ground water bodies.
	9B	Reduce consumption pressure on constrained water resources.	Will it increase the efficient use of water by all?	Quantitative status of surface and groundwater resources.
10. Soil and Geology	10	Enhance geological diversity, reduce risks to soil pollution and protect soil quality.	Will it reduce levels of contaminated land in Rotherham?	
11. Flood Risk	11	Reduce Rotherham's vulnerability to flooding.	Will it prevent inappropriate development in the flood plain and include flood protection systems?  Through design (e.g. use of Sustainable Drainage Systems (SuDS) / efficient use of water) or other measures will it withstand the potential implications of climate change? E.g. changes in temperature, rainfall, drainage patterns, soil erosion, wind and storms; minimise risks or damage to the environment, property, communities and the economy; make provision for species dispersal.  Through design (e.g. use of SuDS), will it prevent an increase in flood risk to others (e.g. achieving greenfield run-off rates or better)?	Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds (RMBC) Number of properties within 1:100 year flood plain (RMBC) Number of properties at risk of flooding. Number of new developments incorporating sustainable drainage schemes. Number of flood incidents and proportion of population affected (RMBC)
12. Waste and Mineral Resources	12A	Reduce the rate of mineral resource consumption. (Fossil fuels are considered under	Will it minimise the consumption of non renewable resources? Will it increase the efficient use of energy, land, soil, minerals, aggregates and other raw materials by all? E.g. through integrated planning and sustainable transport, sustainable design and construction, local supply chains or awareness	Renewable electricity generated as percentage of total electricity (Dti) Renewable energy capacity installed by type (Dti) Percentage of homes built on previously





Ref OA Objection				Where Everyone Matter		
SA Topic	No.	SA Objective	Guiding Questions	necessarily for Local Plan monitoring)		
		Objective 6F.)	raising. During the appraisal each of these resources should be considered separately.  Will it encourage the re-use/enhancement of existing buildings and minimise the need for new build?  Will it optimise the use of renewable energy?  Agricultural Grade of land affected.	developed land (RMBC)		
	12B	Reduce the amount of waste requiring disposal and reduce the use of non-reusable materials.	Will it minimise the use of non re-usable materials? Will it minimise waste from households, businesses, industry or construction, including hazardous waste? Will it promote re-use, recovery, and recycling of waste? Will it provide accessible facilities for recycling waste? Will it deal with waste locally and/or through the Best Practical Environmental Option?	Domestic material consumption per household (RMBC) Total tonnage of household waste arising which is sent to recycling (RMBC) Tonnage of household waste arising which is sent for composting or treatment by anaerobic digestion (RMBC) Tonnage of household waste arising used to recover heat, power and other energy sources (RMBC) Number of recycling sites in Rotherham (RMBC)		
13. Landscape and Townscape	13A	Enhance the landscape and townscape quality of Rotherham.	Will it improve the quality or character of the settlement, area or building? Will it prevent development which is inappropriate in scale or character of its setting or to its function? Will it encourage cleanliness and/or improve the general appearance of neighbourhoods? Will it increase local distinctiveness? (Note potential contribution of natural environment). Will it improve landscape quality? Will it ensure urban fringe and rural landscapes are protected and enhanced and degraded landscapes are improved for the benefits of all residents and visitors and significant loss of landscape character and quality is minimised? Potential for impacts on historic landscape including field patterns etc. How exposed is the site in topographical terms, how visible will it be? Is it likely to give rise to light pollution? Are any of the footpaths on the strategic network? Potential for impacts on key areas of landscape character and	Number of listed buildings in Rotherham (English Heritage) Number/ Percentage of listed buildings in Rotherham "at risk" (English Heritage) %/Number of conservation areas with an up to date character appraisal (RMBC) Percentage of borough covered by Areas of High Landscape Value (RMBC) % of Greenfield land used for development. % of urban fringe land that is degraded or not managed that is brought back into productive or recreational use. Achieve Green Flag Award for Sustainable Management of Parks (RMBC)		
	13B	Reduce light	their setting.  Will it avoid light pollution on sensitive receptors?			





SA Topic	Ref No.	SA Objective	Guiding Questions	Broad Sustainability Indicators (not necessarily for Local Plan monitoring)
		pollution and its affects on people and their surroundings.		
14. Historic Environment	14	Enhance the historic assets of Rotherham.	Will it conserve (including maintain and enhance) those elements which contribute to the significance of the designated heritage assets in Rotherham, including their settings?  Will it conserve (including maintain and enhance) the significance of non-designated heritage assets, including their settings?	Number of designated heritage assets of each type (Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Conservation Areas) Number and percentage of designated heritage assets 'at risk' Percentage of Conservation Areas with an up to date character appraisal (RMBC)





# Appendix 1-D Consultation Responses on the IIA

#### 1-D.1 Scoping Report Consultation 2011 and 2013

#### **Consultation Questions to Guide Responses**

The following italicised text was included in the pre-consultation draft Scoping Report.

Comments on any aspect of this General Scoping Report are welcomed but the following questions are given to prompt consideration:

- Q. Do you feel we have the most up-to-date baseline evidence? (Chapter 4)
- Q. Do you feel there are any legislation, plans or strategies not included in the context review which are either legally binding, will have sustainability impacts in Rotherham worth considering, or will directly affect how the LDF is implemented? (Appendix C)
- Q. Do you agree that the identified key sustainability issues for Rotherham Borough are correct? (Chapter 4)
- Q. The SA Framework was agreed during statutory consultation in 2006. Whilst the content remains the same, we have re-formatted and re-structured it slightly to enable a clearer assessment. Do you agree with how it has been re-structured? (Chapter 5 and Appendix B)

The Council responses presented below have not been amended since 2011. Any reference to the LDF, DPD or SPD should therefore now be assumed to apply to the Local Plan and its local development documents.

Consultee	Comment	Council's Response
English Heritage	In terms of the historic environment, we consider that the Report has identified the majority of plans and programmes which are of relevance to the development of the Local Development Framework, that it has established an appropriate Baseline against which to assess the Plan's proposals and that it has put forward a broadly suitable set of Objectives and Indicators. Overall, therefore, we believe that it provides the basis for the development of an appropriate framework for assessing the significant effects which the Local Development Framework might have upon the historic environment.	Comment welcomed.
	Paragraph 4.16: This Section provides a good general overview of the heritage assets of Rotherham. It should be noted, however, that the latest "Heritage Counts" records 524 Listed Buildings in the Borough (16 Grade I; 38 Grade II*; 470 Grade II). In terms of the state of these assets, it might be worth recording that, at 43%, Rotherham had the third highest percentage of Scheduled Monuments at Risk in the Region.	Baseline updated.





Consultee	Comment	Council's Response
English Heritage (continued)	Table 5.1 SA Objective 13 Appendix B SA Objective 13 To more properly reflect the terminology of PPS5, it would be preferable if this Objective were amended to read:- "Conserve the heritage assets of Rotherham" [PPS5 defines "Conservation" as the process of maintaining and managing change to a heritage asset in a way that sustains and where appropriate enhances its significance].	Comment appreciated, however we disagree and have not changed the SA Objective for the following reasons. It is worth noting firstly that Rotherham's SA Objectives are not required to exactly mimic PPGs or PPSs, though they should be, and are, consistent in interpretation. It is not good practice to include neutral statements in SA Objectives (e.g. "to maintain"), largely because it confuses stakeholders in terms of what achieving a positive score really means (i.e. 'maintaining' is not positive – it is neutral). We feel the general public would not equate "conserve" with achieving enhancement, which is our aim. In summary, we feel the recommended change is too technical (even though the PPS5 definition is acknowledged), and would harm the process and transparency.
	Table 5.2: Since there are no World Heritage Sites in this part of the Region, it is not clear why they are mentioned in this Table. National policy guidance in PPS5 identifies Grade I and II* Historic Parks and Gardens as falling within the group of heritage assets "of the highest significance" where loss or substantial harm should be "wholly exceptional". Therefore, these should be identified as being of "Very High Importance / Sensitivity". PPS5 makes it clear that undesignated archaeological remains of national importance are to be considered as being of equal weight to a Scheduled Monument. Therefore, it might be worth amending the examples under "Very High Importance / Sensitivity" to read:- " Scheduled Monuments and other nationally important archaeological sites" Given that the significance of much buried archaeology is unknown, it is not possible to categorize how sensitive it might be (it could, potentially, be of very high importance). Consequently, it might be better to omit this from the Table.	Comment accepted and agreed. All changes have been made or recognised.  We have not specifically added the text "and other nationally important archaeological sites" simply to save on space, however it is recognised. The table only provides examples, and it is not intended to be comprehensive.





Consultee	Comment	Council's Response
	Table 5.3 The assessment should contain a category covering those cases where the impact upon the SA Objective is uncertain or where its effect will depend upon how the particular Policy is implemented.	We have addressed this differently. We believe that where there is uncertainty (e.g. data is lacking, depends upon implementation), a 'best informed guess' impact score using the precautionary principle should be given, and uncertainty scores used to document uncertainty. Monitoring should be used to check effects after DPD adoption. Question marks tend not to contribute well to the assessment or to DPD development.
		We have added a Table 5-4 to elaborate on this approach.
English Heritage (continued)	to two worded along the following lines:- "Will it conserve those elements which contribute to the significance of the heritage assets in	Comment accepted and agreed, and the change made.
	Rotherham, including their settings? Will it conserve the significance of locally-important heritage assets?	
	Appendix B SA Objective 13, Broad Sustainability Indicators: The Indicators that address the areas which are not provided by RMBC could be simplified as follows:-  · Number of designated heritage assets of each type (Listed Buildings, Scheduled Monuments, Historic Parks and Gardens, Conservation Areas)  · Number and percentage of designated heritage assets at Risk The data for these would come from the annual English Heritage "Heritage Counts" and "Heritage at Risk Register" respectively.	
	Appendix C, Section D1, Objectives and Priorities for the Environment Appendix C, Section D2, Objectives and Priorities for the Environment As Rotherham does not have a World Heritage Site or a coastline, the following can be deleted from this list:-  · UNESCO World Heritage Convention  · Protection of Wrecks Act	Comment accepted and agreed, and the change made, although we clarify that the rationale is that the LDF is unlikely to significantly affect any of these features either within <i>or outside of</i> the borough. This should be re-checked at future assessment stages.
	Appendix C, Section D1, National Policy Guidance & Appendix C, Section D2, National Policy Guidance PPG15 and PPG16 have been superseded by PPS5 and can be deleted.	Comment accepted and agreed, and the change made.





Consultee	Comment	Council's Response
	English Heritage strongly advises that the conservation staff of the local authority and of the South Yorkshire Archaeological Service are closely involved throughout the preparation of the SA of the plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.	Comment welcomed and taken on board. The level of input needed will of course vary with the nature and detail of each Local Plan document.
The Environment Agency	4.8 Biodiversity	Comment accepted, and documents incorporated into the context review.
	We support SA objective 5 in Table 5.1: SA Objectives for Rotherham: 'Enhance Rotherham's habitats and biodiversity'.	Comment welcomed.
	Section 4.9 on Biodiversity refers to SSSIs and LNRs but omits any reference to Local Wildlife Sites. We consider it would be useful to summarise the number and extent (and condition if possible) of Local Wildlife Sites in the district so this information can be considered by the SA.	Comment accepted and some data added. The data is used in an interactive GIS format, and therefore detail on extent should not be needed. Condition data is not available.
	Table 4.2: Summary of Key Sustainability Issues in Rotherham, Topic: Waterways: We are pleased that this report has recognised the recreational and ecological value of waterways and has identified the potential to enhance and protect these assets.	Comment welcomed.
		Comment accepted and agreed, and the addition made.
		Comment welcomed.
	We support SA objective 6B in Table 5.1: 'Reduce the risk of soil pollution'. This ties in with the section on the water environment and may help to meet objective 6C, discussed below.	
	4.9.3 Water Environment We are pleased that water quality has been considered according to the Water Framework Directive (WFD) classification system and that failing water bodies within Rotherham have been identified.	Comment welcomed.





Consultee	Comment	Council's Response
The Environment Agency (continued)	4.9.3 Water Environment The water environment section should also consider water availability from both surface water and groundwater sources. This not only gives an additional indication into the ecological health of rivers or groundwater aquifers but is important to consider when looking at any new water dependent development, including industrial development.	Comment appreciated, however no change made. This has been considered under 'Natural Resources' as per the SA Framework agreed in 2006. This would not normally be considered twice in order to avoid double-counting and repetitiveness.
	We would support an expanded SA objective 6C in Table 5.1: 'Reduce the risk of water contamination and assist in meeting Water Framework Directive objectives'. Improvement measures and remediation work will be necessary to improve water bodies already failing to meet WFD standards, as well as	Comment accepted, however the change has been made within the Decision-Guiding Questions (Appendix B), rather than the SA Objective. This was felt to be more appropriate for this kind of detail.
	4.19 Table 4.2: Summary of Key Sustainability Issues in Rotherham Climate Change: This section focuses only on how climate change may impact flood risk. Impacts of climate change will also result in a reduction in annual river flows during summer months, thereby reducing water availability and potentially water quality. Consideration of these impacts should also be taken into account and promotion of high standards of water efficiency and other sustainable water management systems should be a key sustainability target for Rotherham. We are very pleased therefore to see SA objective 8B in Table 5.1: 'Reduce the rate of water consumption'	Comment accepted and agreed, and the addition made.
		Comment welcomed.
		Comment accepted and taken into consideration. (No change required.)
		Comment accepted and agreed, and the addition made.





Consultee	Comment	Council's Response
The Environment Agency (continued)	4.11 Natural Resources Water resources are managed by the Environment Agency through abstraction licensing. This licensing system stipulates the quantity of water which can abstracted from watercourses and groundwater and ensures that water is managed and used effectively to meet the needs of people and the natural environment. Yorkshire Water manage potable supply and have produced Water Resource	Comment accepted and agreed, and the changes made.
(continued)	Management Plans to help with demand management over the next 25 years.  As we have already commented in detail on the joint Barnsley, Doncaster and Rotherham Waste DPD, other than to say we support SA objective 8C 'Reduce the amount of waste requiring disposal	Comment accepted.
	and reduce the risk of non-reusable materials', we have no specific comments on waste issues.  Background Documents  The following documents not listed in the submitted document should also be considered as part of the SA:	Comment accepted and agreed, and the additions made. This has also been applied to the baseline.
	Water Resources Strategy Our Water Resources Strategy sets out how we consider water resources should be managed to 2050 and identifies areas where action is required. This includes where LA's have been identified as the lead organisation. We would like to see reference made to this document and appropriate measures and actions identified and taken forward into subsequent planning documents. Please see our website at the address given below:  http://www.environment-agency.gov.uk/research/library/publications/40731.aspx	
	Catchment Flood Management Plan - CFMP The CFMP relevant to the Rotherham area can be found on our website under the following link: http://www.environment-agency.gov.uk/research/planning/114022.aspx	
	Catchment Abstraction Management Strategies - CAMS The CAMS relevant to the Rotherham area can be found on our website under the following link: http://www.environment-agency.gov.uk/business/topics/water/119945.aspx	
Natural England	Baseline evidence Natural England considers that an appropriate range of up-to-date baseline data has been used. We welcome the consideration of habitat and species action plans in the local Biodiversity Action Plan, and both geological and biological SSSIs. We would advise that local wildlife sites are also mentioned under Section 4.9.	Comment welcomed. Addition made.
	We are pleased to note that areas of National Landscape Character Areas and accessible green space have been included. It would be helpful to also refer to the green infrastructure corridors that have been identified in Rotherham as a result of Natural England's Green Infrastructure Mapping Project. These include the River Don and River Rother corridors, which are of regional importance, as well as several corridors which are of district importance.	Comment welcomed. Addition made.





Consultee	Comment	Council's Response
Natural England (continued)	Legislation, plans and strategies Two additional documents which it may be worth considering are the Yorkshire & Humber Biodiversity Strategy, and the Climate Change Plan for Yorkshire & the Humber.	Comment accepted, and the Biodiversity Strategy has been added to the context review. It is felt that the Climate Change Plan is being implemented at the more local level by strategies which are covered by the context review. We wish to take up any gaps identified through future liaison with Natural England.
	Key sustainability issues  We would advise that the need to protect and improve access to green space, and the important role that this will play in improving people's health, is included in table 4.2. We welcome recognition of the need to encourage levels of walking and cycling. The reference to landscape and biodiversity protection and enhancement in the key issues is also welcomed. We also welcome reference to Rotherham's role in reducing greenhouse gas emissions and promoting renewable energy.	Comment accepted and agreed, and the additions made.  Other comments appreciated.
	SA Framework We welcome the inclusion of 'improve access to recreational facilities' in the objective 4 on health & wellbeing. We would advise that specific reference is made to green space under this objective. We are pleased to note that the link between access to green space and improved health has been recognised in the guiding questions in table C1.1.	Comment welcomed.
	SA Framework Objective 5 to improve Rotherham's habitats and biodiversity is welcomed and we are pleased that changes in priority habitats and species, and number of locally designated wildlife sites, is included among the sustainability indicators. We also please to note that the need to enhance wildlife corridors and reduce fragmentation has been recognised in the guiding questions for this objective. It would also be useful to include reference to Biodiversity Opportunity Areas. These are areas which have been identified by the Yorkshire & Humber Biodiversity Forum where conservation action is likely to have the greatest benefit for biodiversity.	Comment welcomed, and addition made.
The Highways Agency	The Highways Agency has no comment to offer on the updated Sustainability Appraisal Scope.	N/A
South Yorkshire Passenger Transport	As the organisation responsible for the coordination and management of the South Yorkshire public transport network, SYPTE has comprehensive data on public transport provision to support the LDF evidence base. We are happy to share this data as appropriate to feed into the SA. We would welcome further discussion with RMBC to determine the most appropriate evidence.	Comment greatly appreciated. Future stages of the SA are expected to take further advantage of this working relationship.
Executive	Section 4.7 Economy and Employment SYPTE recognise the Rotherham to Sheffield corridor as being an area of employment growth and a key commuting corridor. Attractive public transport services are required to support this employment, providing the labour market with access to jobs and services and providing a stimulus for further economic growth.	Comment welcomed and accepted, and no action is needed.





Consultee	Comment	Council's Response
	Section 4.8 Transport and Carbon Emissions This section highlights statistics related to the travel to work section of the 2001 census. Although the figures are from a reliable source, more recent evidence is available to which it would be prudent to refer. Modal split is reported through the Local Transport Plan (LTP) monitoring group on an annual basis and is calculated through the cordon counts on specific points on the network. Although this won't give an idea of travel to work, it will provide an up to date estimate the current modal split.	Comment welcomed and accepted, however there has simply not been the time to research this data further. It is felt it can be readily accommodated in future updates, or researched as needed.
	Section 4.8 Transport and Carbon Emissions The section reports that Rotherham has 3 train stations, there are in fact 4 stations; Rotherham Central, Swinton, Kiveton Park and Kiveton Bridge.	The text was reviewed and found to be correct, and no change has been made. The comment is also correct.
South Yorkshire Passenger	·	Comment accepted and agreed, and the change made.
Transport Executive (continued)	Section 4.8 Transport and Carbon Emissions The reference to the third LTP is unclear and inconsistent. The current wording says "(South Yorkshire Local Transport Strategy no. 3, LTP3)". We suggest this is replaced with (Local Transport Plan 3). LTP3 is made up of a number of separate documents. The overarching document is the SCR Transport Strategy. Where content from the SCR Transport Strategy is referred to it should be referenced as such.	Comment accepted and agreed, and the change made.
	Section 4.8 Transport and Carbon Emissions The statement regarding the slower rail speeds and capacity issues on commuting trains has been over simplified. The document suggests that capacity issues on the Hope Valley Line are purely a result of conflict between express, local and freight rail needs. Although, the SCR Transport Strategy recognises the link between sharing rail lines between different rail users and timing issues, this does not contribute solely to capacity issues being experienced.	Comment accepted and agreed, and changes made to separate the issues.
	Section 4.8 Transport and Carbon Emissions The Tram/Train pilot scheme has been given further study resources with the Department for Transport backing further scoping works to be carried out to strengthen the business case for the scheme. The current description of the scheme needs to be more detailed. The pilot will run from Parkgate Retail Centre via Rotherham Central to Meadowhall along the existing rail freight line. When the route reaches Meadowhall, it will connect to Meadowhall South Tram station and continue to Sheffield along the Supertram route (termination point yet to be decided).	Comment accepted and agreed, and additions made.





Consultee	Comment	Council's Response
South Yorkshire Passenger Transport Executive	Section 4.8 Transport and Carbon Emissions Although we recognise that bus use is declining in Rotherham, there a number of planned schemes and initiatives set out in SCR Transport Strategy and its supporting Public Transport Action Plan which seek to tackle the decline. This includes the Bus Key Routes programme, which aims to support attractive, competitive bus services between and into major centres through priority measures and improved facilities. The Key Routes in Rotherham are as follows:  Rotherham - Chapeltown	Comment accepted and agreed, and additions made.
(continued)	Rotherham - Chapetrown Rotherham - Dearne (North) Rotherham - Dearne (South) Rotherham - Maltby Rotherham - Meadowhall (A6109) Rotherham - Meadowhall (A6178) Rotherham - Swallownest/Aston Rotherham Central-Thrybergh	
	It also includes Bus Rapid Transit (BRT) schemes. SYPTE is currently developing the business case for a northern BRT via Meadowhall and Magna and a southern BRT via Waverley New Community and Brinsworth.	
	Section 4.10 Air Quality SYPTE recognise the important role that changing travel behaviour can have on reducing the impact	Comment welcomed. Also, additions have been made to document these actions and commitments.
	Section 4.15 Landscape andTownscape As part of the Rotherham Renaissance project, Rotherham Central is being redeveloped to improve the street scene and the passenger experience of travelling to and from Rotherham. The new station includes a travel information centre, platform canopies, DDA compliant lifts and CCTV. The station is also been designed to include modern architecture that will add to the townscape of Rotherham.	This scheme is already included, and it is felt that such detail is not needed at this stage / for this report, though it may prove useful in the future.
	Section 4.5 Accessibility/Community Facilities As part of the LUTI project and the LDF site allocation appraisal, SYPTE use the DfT accession software to measure accessibility levels to community facilities. This information could be used to measure the accessibility impact of the location of new housing developments or the relocation of key services.	Comment welcomed and noted.





Consultee	Comment	Council's Response
South Yorkshire Passenger Transport Executive (continued)	to a defined public transport threshold (a bus stop with 6 or more buses per hour). This would give an idea of the level of access to public transport services and therefore it will provide a further level of detail to understand why certain modes of transport are being used.  The mode of travel to work is taken from the census and so is only updated once every 10 years. As this indicator effectively is recording modal split, the use of the LTP modal split indicator might more appropriate and is updated on an annual basis.  Table C1, 14. Accessibility; could use some Accession outputs as the base indicator. This could include "the percentage of the population within a set journey time of a community facility". This figure s achievable using SYPTE existing resources but will be restricted to access by public transport and	Comments welcomed, however 'LTP modal split' and 'travel to work' are two quite different indicators. Travel to work is a valuable indicator in support of spatial planning, telling the Council about origin and destination, as well as mode of transport. With the exception of mode of travel, these suggestions are considered too detailed at this level, and such indicators should be researched in more detail for their appropriateness during SA / IIA assessment stages.
	would not consider car accessibility.  Appendix C  Details relating to the SCR Transport Strategy, is inconsistent with the content of the approved document. The text in the 'objectives and requirements relevant to the LDF' should be changed to reflect the wording of the Strategy;	Comment accepted and agreed, and the change made.
	"The South Yorkshire Integrated Transport Authority has prepared a Local Transport Plan for 2011 to 2026 (LTP). This plan sets out 4 overarching strategic goals that will shape transport in the Sheffield City Region and Rotherham during the 15 year lifespan of the plan:  • support the economic growth of SCR  • enhance social inclusion and health  • reduce the emissions from vehicles  • transport increasingly safe and secure"	
Further Inter	nal Consultation within RMBC	1
Emergency Planning	We have no comment to make on the document from an emergency planning prospective.	The next update to the SA Scoping Report (particularly the context review) should check the status of the Reservoir
Officer, Asset Management	Work continues to progress on Warning and Informing people who live in the high risk flood areas of Rotherham with the production of a Community Booklet.	Inundation Plans for inclusion, if available.
J	Work has commenced on the production of Reservoir Inundation Plans for bodies of water exceeding 25000m3 in the borough which includes some of the wetlands.	





Consultee	Comment	Council's Response
Landscape	- 4.12 refers to public realm improvements to High Street though funding was withdrawn by Yorkshire Forward last year. Currently schemes for Minster Yard are nearing completion, Minster Gardens is underway and there is an aspiration for a scheme at the top of Church Street. Planned improvements at Weirside / Market Street have also been halted.	Comment accepted and agreed, and the changes made.
Streetpride	<ul> <li>4.15 Landscape seems an unduly abbreviated summary from the LCA compared with other sections.</li> <li>Overall 'landscape' does not come across strongly in the document and limited emphasis could be taken to suggest a lower priority.</li> </ul>	Comment broadly accepted and additional content added, although the intent in SA is generally always to give equal priority to all issues (i.e. there is no 'weighting', and it will be up to the plan-makers to decide if any more or less weight is given to one issue over another). Given that the LCA is a large document, we have not attempted to repeat its analysis here. However, we have added a summary of the broad baseline.
	- Table 5.1. Landscape is included under 'Rotherham Proud' but has wider significance under Achieving (e.g. 1B and 1C), Learning and Alive and Safe. This follows through to Table C1.1 in Appendix B and I'm sure other aspects could (should?) be emphasised.	Comment accepted and agreed, however no changes made. Alignment with the Community Strategy themes is to demonstrate consistency, and it simply isn't possible or useful to repeat SA topic assessments under each theme. Significant associations in other topic areas should be recognised during assessment.
	<ul> <li>Appendix C List of Plans etc. There is nothing listed for landscape. For example no mention of Landscape Character Assessment for LDF, Public Realm Strategy, Westgate Design Code, Green Spaces Strategy, Play Strategy, South Yorks Green Infrastructure Strategy, South Yorkshire Design Guide.</li> </ul>	Comment accepted. Certain of these strategies / plans have been added, however some are not available and others are only guides, which are not essential and thus not really appropriate to this exercise.
Waste Management	The document looks adequate.	Comment welcomed.
	The revised documents should be used for the Corporate Plan and Community Strategy rather than the old versions in this report.	Comment accepted and agreed, and the change made.





The table below presents the consultation responses received pursuant to the 2013 update to the SA Scoping Report, and the Council's response, including how they have been addressed within this report, where appropriate.

Consultee	Comment	Council's Response
Note on further	Northern BRT scheme is "probable" rather than "possible".	Changes incorporated and improvements made.
RMBC	Updated text relative to the Council's commitment to equality principles (Section 2.3.3).	illade.
internal	opation toxt rolative to the country of many principles (couldn't 2.0.0).	
review	Figures for participation in sport queried – either inaccurate or must be clarified.	
English	In terms of the historic environment, we consider that the Report has identified the majority of plans	Comment welcomed.
Heritage	and programmes which are of relevance to the development of the Rotherham Local Plan, that it has	
Ŭ	established an appropriate Baseline against which to assess the Plan's proposals and that it has put	
	forward a suitable set of Objectives and Indicators.	
	Section 4.16, first Paragraph	Comment accepted and agreed, and the
	Whilst there is a statutory power to compile a Register of Historic Parks and Gardens, there are no	change made.
	statutory controls over development in these areas. Therefore, it would be preferable to amend this	
	Paragraph along the following lines:-	
	"Rotherham has a rich and varied historic environment.	
	This includes 523 Listed Buildings, 37 Scheduled Monuments, 5 Registered Historic Parks and	
	Gardens and	
	26 Conservation Areas. In addition, there are numerous other non-designated heritage assets which	
	contribute to the distinct identity of the Borough. Some of these may be of national importance	
	(English Heritage 2012)."	
	Section 4.16, third Paragraph	Comment accepted and agreed, and the
	The latest figures for Listed Buildings in Rotherham (2012)	change made.
	are as follows:-	
	Grade I – 16	
	Grade II* - 39	
	Grade II - 468	
	Table 4.4, Built Environment and Heritage	Comment accepted and agreed, and the
	One of the key sustainability issues is reconciling the assessed development needs of Rotherham with	change made.
	the protection of its heritage assets. This should be recognised within this Table. It is suggested an	
	additional sentence is added as follows:-	
	"There is a need to reconcile the assessed development	
	needs of the Borough with the protection and enhancement of it heritage assets".	
	Table 4.4, Landscape	Comment accepted and agreed, and the
	One of the key sustainability issues is reconciling the assessed development needs of Rotherham with	change made.





Consultee	Comment	Council's Response
	the protection of its landscape character. This should be recognised within this Table. It is suggested an additional sentence is added as follows:- "There is a need to reconcile the assessed development needs of the Borough with the protection of its landscape character and the setting of its settlements".	
	Table 5.1, SA Topic 14 (historic environment) Under the NPPF, Local Plans are supposed to not only enhance but also conserve the historic environment. Moreover, there is also a statutory duty under the relevant legislation to "protect" most heritage assets. "Protection" is not the same as "enhancement".  The Objective could be changed to "protect and enhance" which would reflect the requirements under the Acts although it would be preferable to use the term "conserve and enhance" since this not only better-reflects current national policy guidance but is a more inclusive term.	Comment rejected. We feel it is confusing to introduce neutral operatives into objectives. It is better practice to have one single positive operative word in each objective, rather than many. Furthermore, aiming for enhancement should be seen to inherently require protection and conservation of what exists.
	It is suggested, therefore, that this Objective is amended to read:- "Conserve and enhance the heritage assets of Rotherham"	"To conserve" is a neutral objective, and introducing it may later confuse people so as to demand a positive score for maintaining the baseline. This would be bad practice, and give a false sense of achievement. We do not wish to tempt such poor practice, and aim for net improvements.
	Table 5.3  Despite your arguments on page 98, it is still considered that the assessment should contain a category covering those cases where the impact upon the SA Objective is uncertain or where its effect will depend upon how the particular Policy is implemented.  The proposed approach, which essentially appears to be to pick a significance and then attribute a	We understand the unique concerns regarding uncertainty in an historic environment context. However, we feel these can be dealt with by using and recording assumptions appropriately.
	degree of certainty to it appears a little random and one could envisage a lot of circumstances in an Allocations DPD where most site assessments end up with a low degree of certainty.	As such, we have not amended the scoring system, including for consistency with other topics. We would seek to
	We would take issue with your assumption that "question marks tend not to contribute well to the assessment". In those Sustainability Appraisals where a question mark has been used, it has enabled mitigation to be put forward to help ensure that the eventual outcome of the proposal is positive.	ensure potential negative effects are reflected where there is uncertainty. Similar approaches to uncertainty have been used successfully on a number of SEAs and related assessments.
		We look forward to testing this approach at the assessment stage, and can amend





Consultee	Comment	Council's Response
		specific assessments accordingly, as this method is a guideline, rather than 'set in stone'. Discouraging use of "?" therefore does not prevent it in future SA work if it proves essential to transparency and clarity.
	Appendix B1.1 SA Objective 13, Broad Sustainability Indicators	We have reviewed the indicators and removed the one on Scheduled
	It is not clear why the first four Indicators (which relate to Listed Buildings, Scheduled Monuments and Conservation	Monuments, as it is not very relevant in hindsight. However, we feel the others
	Areas) are included against this SA Objective, especially as they are already adequately covered under SA Objective 14.	remain relevant to townscape, as built heritage is a very important component of this. Therefore, they are included for relevance without regard for the number of times they appear.
	Appendix B1.1 SA Objective 14, Guiding Questions	Comment accepted and agreed, and the change made.
	At present there is little difference between the two Guiding Questions. It would be preferable to amend them along the following lines:- "Will it conserve those elements which contribute to the significance of the designated heritage assets in Rotherham, including their settings?	
	Will it conserve the significance of non-designated heritage assets including their settings?"	
	Appendix C, Section C1, Cultural Heritage  The third item under this Heading is such a minor amendment to the principal Act that it can be deleted.	Comment accepted and agreed, and the changes made.
	The fourth item is now so old that it can be deleted.	
	Appendix C, Section C1, Cultural Heritage	Comment accepted and agreed, and the changes made.
	The following should be included in the Table: -Under landscape:-	
	· European Landscape Convention (Florence Convention)	
	Under Cultural Heritage:-  · The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention)  · The European Convention on the Protection of Archaeological Heritage (Valetta Convention)	





Consultee	Comment	Council's Response
Natural England	Natural England welcomes the detail provided in the report, and we are satisfied that the methodology and baseline information used to inform the scoping report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance.	Comment welcomed.
	The baseline natural environment indicators appear relevant and although agree with the sustainability objectives detailed in table 5.1 we do however suggest more detail is included in the description of the environmental sustainability objective identified in relation to the natural environment, to not only enhance but to protect, enhance and maintain Rotherham"s habitats and biodiversity.	Comment rejected. We feel it is confusing to introduce neutral operatives into objectives. It is better practice to have one single positive operative word in each objective, rather than many. Furthermore, aiming for enhancement should be seen to inherently require protection and maintenance of what exists.
		"To protect" and "to maintain" are neutral objectives, and introducing them may later confuse people so as to demand a positive score for maintaining the baseline. This would be bad practice, and give a false sense of achievement. We do not wish to tempt such poor practice, and aim for net improvements.
	The potential negative impacts of increased access on sensitive habitats, including designated sites, should be recognised. The pressures of increased access associated with development should be recognised and mitigation recommendations identified.	Comment accepted, but no changes suggested or made. This will be captured during future SA work.
	We welcome the references to green infrastructure (GI) in the report and the inclusion of the GI corridor map. However Natural England considers that the environmental SA Objectives, and some of the social and economic objectives could be improved by further emphasising the importance of GI and its multifunctional benefits, which would assist in the delivery of a range of SA topic areas, e.g. biodiversity, landscape, health and wellbeing and climate change. This would assist in ensuring that GI is an integral, cross-cutting theme.	Comment accepted and changes made where appropriate. Most of these issues had already been incorporated into the SA Framework – in particular, the Guiding Questions of Appendix B.
	We welcome recognition of the requirements of the NPPF, including the need to protect and enhance biodiversity, including designated sites, landscape and open space, water quality, air quality and to address climate change. The NPPF also includes requirements to protect and enhance public access and best and most versatile soils. The scope of the SA should be relevant to the issues addressed in the local plan which itself should reflect the requirements of the NPPF.	Comment accepted, but no changes made. This is already included in the review of the NPPF, and incorporated into the SA Framework.
	Protected species could specifically be included in the SA and Natural England has produced standing advice that you will find helpful, it is available on our website Natural England Standing Advice to help the local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, the local planning authority may need to undertake further	Comment welcomed and accepted, but no changes made. This issue is already included in the SA Framework, and will be addressed during future SA work.





Consultee	Comment	Council's Response
	consultation with Natural England.	
	We welcome the inclusion of a specific objective for soils and geology within the environmental sustainability objectives. Soils form the thin layer of our geodiversity, linking the underlying geology with the land surface and atmosphere. Therefore it is important to make the link between geodiversity, biodiversity and soil resources. Further guidance on soils, including links to important publications such as "Safeguarding our soils: A strategy for England" (Defra, 2009) can be found on Natural England website. Important soil resources should be protected (e.g. best and most versatile (BMV) agricultural land) and appropriate management and handling of soils during the development process is essential. "Safeguarding our soils" provides a clear vision in relation to development and soils – we should 'prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve our understanding of the threats to soil and best practice in responding to them."	Comment welcomed and accepted. Effects on soils will be addressed during future SA work.
	<ul> <li>Suggested indicators provided for future SA stages. These include:         <ul> <li>Number of planning applications with conditions to ensure works to manage/enhance the condition of SSSI/SAC/SPA/Ramsar features of interest</li> <li>Area of SSSIs in adverse condition as a result of development</li> <li>Protected species – Quantified data might include numbers of applications where protected species are considered, numbers with conditions imposed to ensure working practices and works to protect/ enhance protected species, and numbers of planning applications which result in need for protected species licence in order to be carried out</li> <li>BAP habitat - created/ managed as result of granting planning permission (monitored via planning obligations) and which meet Biodiversity Action Plan targets</li> <li>ANGSt as an indicator to monitor the quality of green space and is accessibility</li> <li>assessing changes in landscape character for National</li> <li>Character Areas (as measured by Countryside Quality Counts data)</li> </ul> </li> </ul>	The suggested, more detailed indicators will be considered as part of future SA work, and relative to the potential significant effects of the Local Plan. The feasibility of implementing monitoring and obtaining useful data must also be considered.
	Natural England welcomes the thorough list of international, national and local review of policies, plans and programmes. It appears to cover all relevant documents. It will be crucial to update this list during the next stage of the SA process to ensure emerging policies, plans and programmes are added to the baseline.	Comment welcomed. Further updates will be considered as necessary to ensure suitably robust SA.
Treeton Parish Council	Concerned about potential proposals in the area. The major concern is school capacity within the village.	Such concerns are taken into consideration during future consultation stages on the Local Plan documents and the SA assessment stage.
Dinnington St. John's Town Council	Concerns related to school capacity, particularly in relation to future intake.	Such concerns are taken into consideration during future consultation stages on the Local Plan documents and the SA assessment stage.





# 1-D.2 Consultation on the IIA Report 2013

The consultation responses on the IIA of the draft Sites and Policies document have been collated and are provided in the table below alongside the RMBC response.

Consultee	Comment	Council's Response
Charles David Foulstone	Housing - RMBC's stated policy is to provide cheap affordable housing for 1st time buyers. However, unless there is control over what is built by the developers, there can be no safeguard of this policy. e.g. area LDF0219 is earmarked for 243 homes, but without control this could be achieved luxury housing on most of the site and a block of flats in the corner.	Comment appreciated.  The Council will work with partners to deliver affordable housing and a mix of houses to meet local needs through use of its own land and other initiatives. Detailed policy and implementation guidance shall be laid out in the Affordable Housing Supplementary Planning Document.
	Commercial - can the type of development be controlled. Light industry development would provide jobs. Storage and warehousing is minimal.	At this stage the quantification of potential employment through commercial development is not required. However, we will consider how more information on job creation can be provided in future publications.
Mr Jonathan Taylor	The comment about the helping to establish "a strong Green Belt boundary" is laughable. Green Belt land is Green Belt for a reason (to preserve natural habitats and eco-systems for wildlife) and boundary anomalies are irrelevant.	Comment appreciated, however no change made. A number of policies of the Sites and Policies document promote new development within Rotherham. The provision of new housing, employment, transport and other infrastructure will undoubtedly affect the landscape through land use change and impacts on landscape character.
		Several policies aim to mitigate these risks, including Policy SP1 which states that new development proposals must ensure that they minimise the impact on the openness of the Green Belt. Policy SP37 aims to protect the landscape from new development and requires that all new development proposals will safeguard and enhance the quality, character, distinctiveness and amenity value of the borough's landscapes. These include designated Areas of High Landscape Value, National Character Areas and Local Landscape Character Areas.
		The Core Strategy has highlighted the shortage of suitable development sites available to meet the



Consultee	Comment	Council's Response
		identified need and therefore some sites will be required to be allocated that are within the current Green Belt boundary. However the number of sites to be taken out of the Green Belt are to be kept to a minimum.
response was received from a number of individuals:  Mr and Mrs John and	My observations are as follows:  1. Under chapter 4 (pages 9 to 15 inclusive) of the IIA Sites and Policies document (non Technical Summary) it is stated that R4 and R5 - in combination alternatives• should exclude LDF0237 from any development due to it being in an area of High Landscape Value. Also, Page 41 Appendix E (Results of Stage 2 of the Sustainability Appraisal) and page 74 of Appendix F (Results of Stage 3 of the Sustainability Appraisal) show a red warning for both greenspace availability and greenfield usage generally. Therefore this site should remain in the Greenbelt for these reasons (and also for those associated observations as set out in Question 1 above, number 1).	Comment appreciated, however no change made. Unlike other sites which had 3 or more 'Red' scores, site 237 had good prospects of being delivered and good potential for both mitigating negative effects and opportunities for net enhancements. In addition, it benefits from better highway access than most sites and proximity to Rotherham Urban Area with existing services. For these reasons it has been allocated Residential.
Mrs Ann	<ol> <li>From the same Appendices as in 1 above, a red warning is also shown against water/sewerage and protected species. Therefore site LDF0237 should also remain in the Greenbelt for these reasons (and also for those associated observations as set out in Question 1 above, numbered 4 and 2).</li> <li>Also from the same Appendices as in 1 above, an amber warning is shown against highways access, relative public transport availability and mineral safeguarding area. Therefore for these reasons as well, LDF 0237 should remain in the Greenbelt (and also for those associated observations as set out in Question 1 above, numbered 3, 6 and 7).</li> </ol>	
Mr Craig Russell	4. Under chapter 2 - methodology, I support topic numbers 2B, 2D, 3B, 6B, 7, 8 and 13 as they relate to LDF0237 remaining in the Green Belt.	Comment noted.
Mr Philip	5. As far as chapters 5 - 18 (incl) are concerned, the following are supported:- a) Chapter 6 - Health and Wellbeing, poor access to greenspace, which limits recreation and loss of essential Greenfield land and other greenspace that may be used for informal recreation.	Comment noted.
Jeanette	b) Chapter 7 - Accessibility and Recreation, enhance perception of Rotherham as a place to live and visit. c) Chapter 10 - Transport and Carbon Emissions, in para 10.1, A631 listed as a road of significant congestion and severe delay.	
Richardson	d) Chapter 11 - Biodiversity, development on Greenfield land, and proximity to Local Wildlife Sites (Wickersley Gorse and Listerdale Woods) via Green Infrastructure Corridors. e) Chapter 15 - Flood Risk, Whiston and further downstream to River Rother? f) Chapter 17 - Landscape and Townscape, para 17.2 loss of Greenfield land in areas of High	





Consultee	Comment	Council's Response
	Landscape Value, and potential effects on visual amenity to and from these areas.	
Mr Ian Smith English Heritage	As you will be aware, in terms of the historic environment, we consider that the General Scoping Report had identified the majority of plans and programmes which are of relevance to the development of the Rotherham Local Plan, that it established an appropriate Baseline against which to assess the Plan's proposals and that it put forward a suitable set of Objectives and Indicators. Overall, therefore, we believed that it provided the basis for the development of an appropriate framework for assessing the significant effects which the Local Plan might have upon the historic environment. In terms of the historic environment, we would broadly concur with the assessment of the likely effects which the plan would be likely to have upon the heritage assets of the plan area. Where harm has been identified, we would support the mitigation measures which have been proposed.	
	There are, however, a number of areas where it is considered that some amendment is needed. These are as follows: - Table 3-1, SA Topic 14 (Historic Environment) Under the NPPF, development proposals should "conserve"• those elements which contribute towards the significance of heritage assets. As the Glossary to the NPPF makes clear, "conservation"• includes managing change to a heritage assets in a way which not only enhances but also "sustains its significance"•. Moreover, there is also a statutory duty under the relevant legislation to "protect"• most heritage assets. "Protection"• is not the same as "enhancement"•. It would be preferable to use the term "conserve and enhance"• since this not only better-reflects current national policy guidance but is a more inclusive term. It is suggested, therefore, that this Objective is amended to read:- "Conserve and enhance the heritage assets of Rotherham"•.	Comment accepted and agreed.  The SA Objective in Table 3-1 will be amended to read "Conserve and enhance the historic assets of Rotherham".
	Paragraph 19.3 Aston/Aughton/Swallownest -"should also mention:- Impact upon Conservation Area (Site 413) Outlying Settlements - should mention:- Impact upon Conservation Area.(Site LDF0515 and Site LDF0551) Swinton/Kilnhurst -" should mention:- Impact upon Conservation Area.(Site LDF0376) Thurcroft "should mention:- Close proximity to Conservation Area (Site LDF0773), Close proximity to Listed Buildings (Site LDF0773 and LDF0437). Paragraph 19.10	Site 413 has already been allocated for residential use.  Paragraph 19.3 addresses issues in relation to the historic environment.  These sections have been updated and further work undertaken to consider these issues in greater detail.
	Paragraph 19.10 considers that the DPD, as a whole will have an adverse impact upon the historic environment of Rotherham, but the degree of certainty with this conclusion is "low". In order to ensure that the likelihood of harm is minimised, this section should be suggesting a number of mitigation measures:-  (1) Conservation Area Appraisals - This would help to improve the confidence that the DPD	Comment appreciated, however the Sites and Policies document includes a range of mitigation measures in relation to developments involving listed buildings and affecting Conservation Areas. In addition to Rotherham's Conservation Area
	would deliver a more positive outcome for the historic environment by two means:-  a. Several of the areas which have been put forward as possible allocations lie within, or would impact upon the setting of, one of Rotherham's Conservation Areas. An upto-date	Design Guidelines or other good practice guidance published by the Council, a programme of Conservation Area appraisals, management





Consultee	Comment	Council's Response
	Conservation Area Appraisal for each of the settlements where sites are being proposed for development would assist the Council in determining whether or not the allocation of these sites would be likely to harm elements which contribute to the character or setting of these areas. It would also help to determine what mitigation might be adopted and the most appropriate form of development for each particular site.	plans and enhancement schemes to manage change and guide development in Conservation Areas will be undertaken.
	b. Elsewhere, the production of up-to-date Conservation Area Appraisals which clearly identify the elements which contribute to the significance of those areas would help to ensure that future development proposals are delivered in a manner which safeguards their character.	
	(2) Bassingthorpe Farm Development - The development of this area could, potentially, result in harm to several designated heritage assets in its vicinity. This impact of the development of this site upon the heritage assets in the area is currently being evaluated as part of the Bassingthorpe Farm Heritage Impact Assessment. That Study will examine whether or not it is appropriate to allocate these sites and, if it is, what mitigation measures might be needed to reduce any harm upon those elements which contribute to the significance of the heritage assets in this part of Rotherham. In order to ensure that the Bassingthorpe Farm development is delivered in a sustainable manner in terms of its impact upon the historic environment, it is essential that the mitigation measures which the Bassingthorpe Farm Heritage Impact Assessment puts forward are securely and effectively tied into the Plan itself and into any subsequent Masterplan and development briefs.	Core Strategy.
		Comment accepted and agreed. Changes have been made or recognised. The text for this Policy has been amended to read: Historic Parks, Gardens and Landscapes
		The Council will seek to ensure the protection and appropriate enhancement of the Borough's historic parks and gardens. Development proposals should:
		a. safeguard those features which form an integral part of the special character or appearance of the Park or Garden;
		b. ensure that development does not detract from the enjoyment, layout, design, character, appearance or setting of the Park or Garden, key views out from the Park, or prejudice its future restoration. Where development is likely to affect a Historic Park and Garden or its setting, applications should include a Heritage Impact





Consultee	Comment	Council's Response
		Assessment setting out the likely impact which the development would have upon its significance and the means by which any harm might be mitigated.
	Paragraph 20.1, first Paragraph on page 257, line 10 If the effects upon buried archaeology cannot be predicted, it is impossible to ascertain what effect "high quality management of this issue" (whatever that might mean) will have. Certainly, it would not be appropriate to assume that the effects could be reduced to "slight". Therefore, it is better to leave the impact as uncertain and, as part of the recommendations, to ensure that the plan has in place a robust Policy for developments likely to impact upon archaeological remains.	Comment appreciated, however, the paragraph goes on to explain that high-quality management of buried archaeology and the various methods of preservation available (including preservation by record) can potentially limit the effects to slight adverse.
	English Heritage strongly advises that the conservation staff of the local authority and your archaeological advisors at South Yorkshire Archaeological Service are closely involved throughout the preparation of the SA of the plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.	Comment appreciated. Rotherham Metropolitan Borough Council has engaged with English Heritage in the preparation of the SA and in carrying out additional archaeological surveys.
	Finally, we should like to stress that this opinion is based on the information provided by you with your e-mail dated 17 May, 2013. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.	Comment noted.
Principal Archaeologist South Yorkshire Archaeology Service	I support the concerns raised by English Heritage about the assessment of buried archaeological potential in relation to the site allocation assessment process. As they say, re. the first paragraph on page 257, line 10 - if the effects upon buried archaeology cannot be predicted, it is impossible to ascertain what effect "high quality management of this issue" will have. They are right to say, therefore, that it is not appropriate to assume that the effects could be reduced to "slight"•. We advised on the need for an archaeological assessment of sites being considered for allocation but the scoping review then carried out by Wessex Archaeology is now out of date as additional sites are now being proposed for allocation. It is vital that all sites being considered for allocation are archaeologically assessed, to ensure that the impact of development on this aspect of the historic environment is given equal weight to other environmental considerations. I look forward to discussing the completion of an additional scoping review with you. The resuts will then need to be considered in an updated Sustainability Assessemnt and Integrated Impact Assessment.	Comment appreciated.  Metropolitan Borough Council has carried out additional archaeological surveys to inform site allocations.
	Integrated Impact Assessment (Including Sustainability Appraisal and Habitats Regulations Assessment) Natural England considers the Sustainability Appraisal methodology compliant	



Consultee	Comment	Council's Response
Lead Advisor	with the SEA Directive, and Environmental Assessment of Plans and Programme Regulations 2004.	
England	The Integrated Impact Assessment does not include the Habitats Regulation Assessment. In order to ensure allocations and policies do not adversely affect the integrity of an internationally protected nature conservation site, an HRA should accompany the next iteration of the Sites and Policies Development Plan. Natural England can advise Rotherham Council further on this assessment.	Comment appreciated.
RSPB (Yorkshire & Humber	Strategic Housing Land Availability Assessment, paragraphs 12.31 and 12.32 The RSPB supports the approach used here to safeguard wildlife and habitats of conservation value and environmentally sensitive features from adverse impacts from housing development. This appears to be pragmatic and proactive approach which should help to ensure that such development is sustainable. Employment Land Review Paragraphs 12.53 C. Key environmental and heritage considerations The RSPB supports the approach outlined here as a useful filter and step in the assessment process which should help ensure that development of land for employment sites does not result in damage to wildlife and habitats of high conservation value.	
Planning Officer SYPTE	SYPTE welcome the inclusion of the LUTI analysis outcomes as part of the site selection criteria. SYPTE realises the link between economic growth and the derived demand for the transportation of people, goods and services. It is therefore vitally important that the location of future employment sites is sympathetic to the transportation needs of the intended workforce, to ensure that economic prosperity can be achieved sustainably. The inclusion of the LUTI outcomes will reflect this. The site selection process also ensures the importance for new job opportunities to be provided for local people. SYPTE welcomes this statement as this will greatly reduce the need to travel long distances, therefore ensuring that public transport, walking and cycling become competitive travel options. However, if this is not properly managed, there is a chance of increased localised congestion if car travel is preferred. This policy is supported by our SCR Transport Strategy in terms of locating development in the most sustainable locations. This principle is also supported by the joint working between RMBC and SYPTE on the LUTI project.	Comment appreciated.
	One further consideration is the link between industrial uses and air quality, particularly in terms of emissions from vehicles. It is unclear how each element of the IIA is weighted. SYPTE would like the plan to state how/if the scoring process has any weighting. It would be unrealistic to assume the same level of consideration between something like impact on High Speed Rail (nationally significant infrastructure) and soil as without any weighting being applied.	Comment broadly accepted, although the intent is to give equal priority to all issues (i.e. there is no 'weighting', and it will be up to the plan-makers to decide if any more or less weight is given to one issue over another).





# 1-D.3 Consultation on the IIA Report 2014

The consultation responses on the IIA of the final Sites and Policies document have been collated and are provided in the table below alongside the RMBC response.

Consultee	Comment	Council's Response
English Heritage	As you will be aware, in terms of the historic environment, we broadly concurred with the assessment of the likely effects which the plan would be likely to have upon the heritage assets of the plan area and, where harm was identified, we supported the mitigation measures which were proposed. We are pleased to note that the majority of the changes which we suggested should be made to that document have been incorporated into this latest iteration of the Assessment. In terms of this latest consultation document, we would, again, broadly agree with the assessment of the likely significant effects which the Plan would be likely to have upon the heritage assets of Rotherham. Where harm is likely to occur, we would support the mitigation measures which have been proposed.	Comment welcomed – no change to the IIA.
	There is, however, a number of areas where it is considered that some further thought should be given. This is as follows:- Page 297 Section 19 (Historic environment) Paragraph 19.10 The development of several of the sites identified as housing allocations in the Plan's	The further recommendations by English Heritage have been incorporated in the IIA.
	Appendices could, potentially, result in harm to elements which contribute to the significance of Rotherham's designated heritage assets. (It also possible that a number of them would also affect other elements which contribute towards the Borough's landscapes or natural environment). Because of the sensitive nature of some of these locations, it is not sufficient to rely on the general, non-site-specific Policies of this Plan as the basis for ensuring that the development of these areas is delivered in a way which will safeguard the area's natural and historic environment. In order to assist those preparing detailed schemes for these allocations and to increase the likelihood that the sites are developed in a sustainable manner, an additional column should be added to each of the Tables in the Plan's Appendices setting out the key considerations that need to be taken into consideration in the development of each of these areas. This could also address other issues such as highways and drainage as appropriate. In order to ensure that these development principles are effectively tied into the Local Plan, the relevant Local Plan Policy (Policy SP11) should be amended to include a requirement for any development proposals to	In considering this representation the Council has, for appropriate sites, included development principles to guide future planning applications and has clearly referenced these principles in Policy SP1. The site development principles are not included as appendices to the Plan but as an integral part of it. The Council has also undertaken further evidence base work to consider the historic environment and these assessments will be available on the Consultation Portal.
	have regard to the development principles set out in the relevant Appendix. Such an approach would help to provide certainty to both potential developers and local communities about precisely what will, and will not, be permitted on these sites and would raise the degree of confidence about the impact which the development of these sites would	





	When				
Consultee	Comment	Council's Response			
_	have upon the historic environment. It is suggested, therefore, that the recommendations are amended as follows:- (a) Add an additional column to each of the Schedule of Sites within the Appendices (entitled "copevelopment Principles") which sets out the detailed considerations which would need to be taken into account in the development of all the proposed allocations. (b) Add the following to the end of the first Paragraph of Policy SP11:- "Proposals for the development of the allocated sites will be required to accord with the development principles set out in the Schedule of Sites in Appendix 1 to 11" Finally, we should like to stress that this opinion is based on the information provided by you with your e-mail dated 13 October, 2014. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.  The Integrated Impact Assessment is inconsistent in the application of the methodology which has informed the allocation of sites (see representation to site 0040 for further detail). As a result the credibility and robustness of the evidence base is not justified when considered against the reasonable alternatives and based on proportionate evidence.	The Council has read your representation with interest and does not accept your assertion. The Council considers that its Integrated Impact Assessment is credible and robust and recognises that your response is motivated by the Council's assessment of site LDF0040 The Pitches at Wickersley. This site is a privately owned Sports Ground that during the period of Plan preparation planning permission was granted (RB2012/1608) to a local sports team Whiston Wildcats JF Team, to create hardstanding for further car parking on the site to enable league team games to be played. In these circumstances it would be remiss of the Council to allocate such a site for development when there is clearly a demand for recreational sporting facilities on site.			
Helen & Gary Greer- Waring	Site 730 should not have been put forward as a site because it does not meet the standards set out for the integrated impact assessment. Along with site 830, the sites will have a significant adverse impact on biodiversity and ecology in the area. As was made clear in the 2013 consultation process, Todwick is a small village and does not have the infrastructure to support anything more than infill development. The development of 4 homes on the site of the old people's home is the type and level of sustainable development the village can absorb. The planning constraints around that particular development are at odds with the	The comment is understood, and the stakeholders' concerns for environmental matters appreciated. However, it is important to maintain that the Integrated Impact Assessment is a process that only informs decisions on the basis of established methods and principles in determining the potential extent of any impacts. It is also proactive in identifying mitigation for any potential			



Consultee	Comment	Council's Response
	now proposed development of 107 homes 30 metres away. The inconsistency of approach here is disturbing.	adverse impacts of decisions. It may not conclude on the basis of evidence that sites are non-viable, but rather that their constraints and potential detriments must be recognised and dealt with accordingly, either via site selection / non-selection, or via mitigation measures.
		In the case of Site 730, there has been a concern / constraint identified via the IIA with regard to protected species. However, such constraints to development are very common certainly on a national scale, and often are easily overcome or managed to within acceptable levels of impact via quite standard mitigation and good practice. At a strategic level, the evidence available to the IIA does not point to any particular infrastructure constraints for this site. RMBC has independently from the IIA developed a general understanding of this site, and currently considers that there is a highways access issue which can be overcome – as such, there are no infrastructure constraints which threaten the viability of a future planning application, or which would prevent the site's development.
		Any detailed and site-specific constraints which pose a potential problem would be identified by relevant officers dealing with any future planning application, and then dealt with appropriately.
Harron Homes	The rationale for the site selection of sites at Bramley/Wickersley seems reasonable. The results of the Stage 2 Sustainability Appraisal of Site 360 has been noted. The "red' scoring against Protected Species and Mapped Water Bodies has also been noted, along with the previous comments made by the Sheffield and Rotherham Wildlife Trust to the previous consultation in relation to impact on Local Wildlife Site 42. Harron Homes, in preparing a planning application, will consider the potential impact of LWS42 and will prepare a full Ecological Appraisal of the site with mitigating measures, where required.	Comment welcomed – no change to the IIA.
Trustees of GMT Foljambe	It is not accepted that the site appraisal in document II A part 2 has weighted the highway and transportation issues properly given the accessibility to the Bawtry Road which is a public transport corridor. It is considered that the negatives that relate to this site have been	The Site LDF0129 is proposed as Safeguarded Land in the emerging Sites and Policies Document. All preferred site allocations have





Consultee	Comment	Council's Response
	over estimated in the SA of the individual sites and that the site is unconstrained with respect to highways and relationship to quality landscape areas and that these matters should be re assessed to allow the site to come forward within the plan period.	some positive and some negative scores in the SA Stage 2, this does not prevent the site from being selected as a preferred development site or as Safeguarded Land. Section 4 of the Final draft Sites and Policies Document clearly outlines the approach taken to identifying the Council's preferred allocations. As noted in paragraph 4.5 of the Final draft Sites and Policies Document 2014, the SA is not a decision-making tool, but rather SA informs decision-making. Further Paragraph 4.6 clarifies that there are no insurmountable issues to the allocation of development sites but by its nature site selection methodology tends to highlight constraints and this can bring out potential negatives more than potential positives. In response to some of the queries raised during the consultation, the Council has reconsidered Stage 2 of the SA for the 2015 Publication Sites and Policies Document, and has refreshed the Integrated Impact Assessment that will accompany the Publication Sites and Policies Document 2015 during its consultation. The Council considers that its approach to SA is credible and robust and that it has justified its selection of the preferred allocations to meet the Objectively Assessed Housing Need. The Council does not accept that further site allocations need to be identified to meet the requirements of the Core Strategy. No change to the IIA.
Managing Director Ernest V Waddington Ltd	Site 802 was rejected as stage 1 of the document as being outside the settlement boundary, however the inclusion of 020 as safeguarded land alters the situation with regard to the land and it should be re appraised as an extension to that site.	Comment appreciated, but the Council does not agree with your assertion that a re-assessment of LDF0802 should be undertaken as LDF0020 is preferred as Safeguarded Land. LDF0802 is remote from nearby communities, it would promote ribbon development along West Bawtry Road; and at least half of the site is within flood zone 2 whilst the southern boundary is adjacent to Flood Zone 3. It is within an Air Quality Management Area. No change to the IIA.





Consultee	Comment	Council's Response
Mr Jeremy White	Site 701 has been eliminated in part I of the SA on the basis that it is outside a settlement and remote. However the site is closer to main facilities than the preferred site which is also outside a settlement and which has 9 amber scorings in the SA, which clearly denote that there are significant difficulties with this location. There is no comparative in the SA between sites that are put forward for gypsy/traveller purposes, which would enable a proper comparison.	The Sustainability Appraisal has established a clear methodology and paragraph 12.54 in Section 12 'Methodology: Identification of Sites', in the Sites and Policies document 2014, refers. This site (LDF0701) has been excluded from further consideration at stage 1 because of its remoteness from nearby settlements. Your suggested comparison of LDF0701 with the SA Stage 2 of the preferred Gypsy and Traveller allocation (LDF0462) is not helpful as only the preferred allocation site has been scored at Stage 2. The Council does not accept that its preferred Gypsy and Traveller allocation has significant difficulties and has further considered this site outside of the SA process to understand in greater detail any issues and concerns relating to the future use of the site for the Gypsy and Traveller community.
Mr Rae Borrell	Site 803 is marked down in this document for several reason relating to geographical barriers, distance to leisure facilities, protected species and access to recycling facilities. Some of these factors have been wrongly calculated .The site scores are superior to 533 the allocated site, and the site should be re considered as the preferred allocation on the basis of the SA results.	The IIA provides a detailed appraisal of each site and highlights the constraints affecting sites and the areas where further work is required. All preferred site allocations have some positive and some negative scores in the SA Stage 2, this does not prevent the site from being selected as a preferred development site or as Safeguarded Land. Section 4 of the Final Draft Sites and Policies Document clearly outlines the approach taken to identifying the Council's preferred allocations. As noted in paragraph 4.5 of the Final Draft Sites and Policies Document 2014, the SA is not a decision-making tool, but rather SA informs decision-making. Further Paragraph 4.6 clarifies that there are no insurmountable issues to the allocation of development sites but by its nature site selection methodology tends to highlight constraints and this can bring out potential negatives more than potential positives. In response to some of the queries raised during the consultation, the Council has reconsidered Stage 2 of the SA for the 2015 Publication Sites and



0	0	Where Everyone Matters
Consultee	Comment	Council's Response
		Policies Document, and has refreshed the Integrated Impact Assessment that will accompany the Publication Sites and Policies Document 2015 during its consultation. The Council considers that its approach to SA is credible and robust and that it has justified its selection of the preferred allocations. No change to the IIA.
Listerdale Estates	Document IIA indicates that site 801 Spring garden quarry was discarded because it was unavailable, this is not true the land is available and was promoted as such. It is not agreed that the SA properly deals with site 0114 Brecks Crescent, it is deleted solely on the basis of being an LWS. The designation through the development plan as an LWS is not confirmed; that is part of this process and has been objected to above. The site should be re assessed on that basis.	LDF0801 has not been taken forward for SA assessment at Stage 2 as the site is low-quality / high-value Urban Greenspace and the Council propose to retain this site as Green Space in the emerging Local Plan. The draft Local Plan incorrectly states that site LDF0114 has been included in Local Wildlife Site LWS063 Listerdale Wood and this will be corrected. The sites are adjacent and share a boundary but do not overlap. LDF0114 appears to have semi-natural characteristics and ecological assessment has been undertaken to inform its allocation. The Ecological Assessment is available to download from the Consultation Portal. The Council is not minded to allocate this site for future development.
Sheffield	Misallocation of site LDF0371 using site selection methodology / IIA scores. See attached.	Site 0371 has been assessed using the same
Diocesan		methodology and evidence-base as all other sites.
Board of Finance and		It has been put forward as safeguarded residential land. This has been the consistent preference of
Trustees of		the Council since 2013, given all factors taken into
the Warde-		consideration.
Aldam 1954		
Settlement		
Mr Mark Bucknill	See attached statement.	The comments in this representation relate to the promotion of site LDF0729, land to the south of Sheffield Road, Todwick. Consideration is given in your representation to the SA stage 2 assessment of this site and its results compared to the Council's preferred allocation of LDF0730. In response to some of the queries raised during the





Consultee	Comment	Council's Response
		consultation, the Council has reconsidered Stage 2 of the SA for the 2015 Publication Sites and
		Policies Document, and has refreshed the
		Integrated Impact Assessment that will
		accompany the Publication Sites and Policies
		Document 2015 during its consultation. The
		Council considers that its approach to SA is
		credible and robust and that it has justified its
		selection of the preferred allocations. A Detailed
		Green Belt Review has been prepared to
		accompany the next consultation on Publication
		Sites and Policies Document and will identify
		those development site allocations and
		safeguarded land proposed to be removed from
		the Green Belt. It will examine the
		appropriateness of new Green Belt boundaries for
		the preferred development site allocations and safeguarded land.

# **JACOBS**



# Appendix 1-E HRA Screening

# 1-E.1 HRA Screening



**Environment & Development Services** 

Rawmarsh Road | Bailey House | Rotherham | S60 1TD Telephone: 01709 823831 Fax: 01709 823865

Natural England Consultation Service Hornbeam House, Electra Way, Crewe Business Park, Crewe, Cheshire, CW1 6GJ.

September 2015

Dear Sir, Madam

# Habitats Regulations Assessment Screening Determination for the Pre-Submission Draft Rotherham Local Plan Sites and Policies Document

We have consulted with you previously (June 2013 and October 2014) on the screening determination as to whether Appropriate Assessment is required as part of the Rotherham Local Plan Sites and Policies document. Following amendments to the Sites and Policies document in response to statutory consultation, the information presented under cover of this letter is submitted to Natural England for a screening determination as to whether Appropriate Assessment is required as part of the final Sites and Policies document submission.

The main amendments to the (as dated) September 2014 screening determination involve the removal and addition of some allocations from the assessment. The policies relevant to the HRA Screening have not changed significantly since the September 2014 screening determination.

Rotherham's Sites and Policies document is one of several local development documents which will make up the Local Plan. The Sites and Policies document sets out Rotherham's proposed residential and employment allocations and proposed safeguarded land over the next 15 years. It also sets out a number of detailed development management policies which will supplement the strategic policies, guide the determination of individual planning applications and facilitate implementation of site allocations.

Evidence of the need, or otherwise, for Habitats Regulations Assessment (HRA, also sometimes referred to as 'Appropriate Assessment') is a requirement when submitting a local development document under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This must, as a minimum, include the 'screening' stage of HRA.









# **European Nature Conservations Sites**

The table below sets out the reasons for designation for the Natura 2000 sites (Special Protection Areas – SPAs – and Special Areas of Conservation - SACs) of potential relevance to the Local Plan, including Sites and Policies document. This includes all sites within 20 km of Rotherham Borough, as previously requested by Natural England. (Note: no Ramsar sites have been identified as being relevant.) During the screening exercise, it has not been considered necessary to expand this search area. Information for each site has been obtained from the Joint Nature Conservation Committee website.

Table 1: Natura 2000 Sites in HRA Study Area (20 km from RMBC boundary)

Туре	Name	Site Centre Location	Site Area (ha)	Direction from Rotherham Boundary	Shortest Distance from Rotherham	Qualifying Features
SPA	Thorne and Hatfield Moors	53 38 16N 00 53 53 W	2.449.00	Е	19.5 km	Annex 1 birds Article 4.1 Caprimulgus europaeus
SPA	Peak District Moors (South Pennine Moors Phase 1)	54 39 24 N 02 14 49 W	147.246.40	NW/SW/W	12.5 km	Annex 1 birds Article 4.1 Circus Cyaneus Falco columbarius - Falco peregrinus Pluvialis apricaria (North- Western Europe – breeding)
SAC	South Pennine Moors	53 27 37 N 01 46 59 W	64,983.00	NW/SW/W	12.5 km	Annex 1 habitats 4010: Northern Atlantic wet heaths with Erica tetralix 4030: European dry heaths of the best areas in the UK. 7130: Blanket bogs 7140: Transition mires and quaking bogs presence. 91A0: Old sessile oak woods with Ilex and Blechnum in the British Isles
SAC	Denby Grange Colliery Ponds	53 38 01 N 01 35 26 W	18.53	NW	18.6 km	Annex 2 species 1166: Great crested newt Triturus cristatus
SAC	Hatfield Moor	53 32 37 N 00 56 38 W	1.363.50	Е	19.5 km	Annex I habitat 7120: Degraded raised bogs still capable of natural regeneration
SAC	Birklands and Bilhaugh	53 12 17 N 01 04 31 W	271.80	S/SW	13.5 km	Annex I habitat 9190: Old acidophilus oak woods with Quercus robur on sandy plains





## **Objectives of the Sites and Policies Document**

The Rotherham Local Plan serves to guide the way in which built development occurs in the borough, with regard to its relationship with communities and the surrounding environment. As part of the Local Plan, the Sites and Policies document aims to achieve the Vision and Strategic Objectives which are set out in the Core Strategy. These are set out below.

The objectives of the Sites and Policies document are consistent with the vision and objectives for the Local Plan, as set out in the Core Strategy.

# **LOCAL PLAN VISION**

Rotherham will be prosperous with a vibrant, diverse, innovative and enterprising economy. It will fulfil its role as a key partner in the delivery of the Sheffield City Region recognising the close economic, commercial and housing markets links with Sheffield and our other neighbouring authorities.

Rotherham will provide a high quality of life and aspire to minimise inequalities through the creation of strong, cohesive and sustainable communities. Rotherham will be successful in mitigating and adapting to future changes in climate. It will have a sense of place with the best in architecture, sustainable design and public spaces. Natural and historic assets will be conserved and enhanced. Rotherham will promote biodiversity and a high quality environment where neighbourhoods are safe, clean, green and well maintained, with good quality homes and accessible local facilities, making best use of existing infrastructure, services and facilities. A network of green infrastructure will link Rotherham's urban areas with the wider countryside, providing access to green spaces and acting as habitat links for wildlife.

The largest proportion of growth will be focused in the Rotherham Urban Area including major new development at Bassingthorpe Farm which is key to delivering growth in the heart of Rotherham. Regeneration of Rotherham town centre will enable it to fulfil its role as the borough's primary retail, leisure and service centre. Considerable development will take place on the edge of the urban area at Waverley, with the development of a new community and consolidation of the Advanced Manufacturing Park. Significant development will also take place in Principal Settlements for Growth: in the north around Wath, Brampton and West Melton, on the fringe of Rotherham Urban Area at Wickersley, Bramley and Ravenfield Common, and in the south-east at Dinnington, Anston and Laughton Common. New development will also take place in the borough's principal settlements and local service centres. Throughout Rotherham development will aim to create self-contained communities which support a network of retail and service centres, where the need to travel is reduced and communities enjoy good access to green spaces and the wider open countryside.

# **LOCAL PLAN OBJECTIVES**

Delivering development in sustainable locations

Objective 1: Scale of future growth

By the end of the plan period, sufficient new homes and employment opportunities and a choice of development sites will have been provided to meet objectively assessed development needs.

Objective 2: Green Belt

In implementing the plan's spatial strategy over the plan period, the wider aims of national Green Belt policy will have been safeguarded while a borough-wide review will have informed the release of Green Belt land in the most sustainable locations for growth to meet future needs.

Objective 3: Sustainable locations

By the end of the plan period, the majority of new development will have been located in or on the edge of sustainable urban locations, close to transport interchanges and within transport corridors. Wherever viable and sustainable, previously developed land will have been used first. Car dependency and the need to travel will





have been reduced by the promotion of higher housing densities and mixed use developments in appropriate locations, travel planning and public transport improvements.

### Creating mixed and attractive places to live

#### Objective 4: Provision for housing

By the end of the plan period, implementation of the plan's policies will have helped improve quality and amount of housing available in all areas of Rotherham. Development of new housing will have improved choice of type, tenure and affordability, including provision for gypsies and travellers. Any established need for affordable housing in specific rural communities will have been met.

### Supporting a dynamic economy

# Objective 5: Retail and service centres

By the end of the plan period, the plan's "town centre first" approach to development decisions will have improved the economic viability and vibrancy of Rotherham Town Centre as the borough's principal location for business, commerce, culture, leisure, town centre uses and civic activities. The plan will have supported the aim of providing a community stadium as close to Rotherham town centre as possible. The implementation of a retail and settlement hierarchy will have steered new development to appropriate centres to sustain and, where appropriate, extend retail, leisure, employment and community services. Smaller local centres will have been sustained to continue provision for local daily needs.

### Objective 6: Provision for employment

By the end of the plan period, the borough's economy will be more modern, diverse and enterprising and will have moved closer to a low-carbon economy. Implementation of the plan's policies will have helped provide a wide range of accessible job opportunities in the borough. The regeneration and improvement of existing employment sites will have been complemented by the creation of local and rural employment opportunities.

# Movement and accessibility

# Objective 7: Local transport connections

By the end of the plan period, the proportion of trips made by walking and cycling will have increased. Public transport interchanges and bus services between local communities will have been improved. Implementation of the plan's policies will have helped to secure improved information technology networks to enable increased "teleworking", along with the development of live/work housing and mixed use schemes in appropriate locations.

## Managing the natural and historic environment

# Objective 8: Landscape, historic environment and settlement identity

Implementation of the plan's policies over the plan period will have helped promote the continuing management, protection and enhancement of the borough's distinctive historical features and landscape character. While allowing for growth of certain settlements to implement the plan's spatial strategy, wherever possible, the identity and setting of individual settlements will have been maintained and enhanced.

#### Objective 9: Greenspaces, sport and recreation

By the end of the plan period, the borough's network of green infrastructure will have been identified, conserved and enhanced. Implementation of the plan's policies will have protected and enhanced the borough's network of accessible sport and recreation facilities and helped improve the health of Rotherham's population.

### Objective 10: Biodiversity / geodiversity

By the end of the plan period, the borough's significant biodiversity and geodiversity sites will have been identified, designated, conserved, managed and enhanced. Opportunities for expanding, linking and creating significant sites will have been identified and delivered. The geodiversity, habitats, and greenspace eco-systems





of the wider environment will have been conserved, enhanced and managed by implementation of the plan's policies. The borough's best and most versatile agricultural land will have been protected, wherever possible, to promote local food production.

Objective 11: Minerals

By the end of the plan period, the borough's mineral reserves will have been identified and managed to provide for the needs of the construction industry and to meet Rotherham's contribution towards the infrastructure, buildings, energy and goods that the country needs. In tandem with this, the use of recycled and secondary sources, sustainable site waste management practice and the use of sustainable building materials will have been increased by implementation of the plan's policies. Sources of local building materials will have been safeguarded for conservation of the borough's built heritage.

Objective 12: Managing the water environment

By the end of the plan period, implementation of the plan's policies to regulate development will have conserved, managed and enhanced the borough's water environment and contributed to the wider integrated management of water catchments. The risks of pollution of rivers and water resources, depletion of water supplies, flooding and harm to biodiversity and leisure interests will have been minimised by implementation of the plan's policies.

Objective 13: Carbon reduction and renewable energy

By the end of the plan period, the borough's carbon footprint will have been reduced from current levels. Implementation of the Plan's policies will have secured an increased proportion of energy generation via renewable and low carbon means and will have promoted energy efficiency, energy conservation and the use of sustainable construction techniques.

Creating safe and sustainable communities

Objective 14: Design

By the end of the plan period, new development built to sustainable design standards will have contributed to the creation of safe, accessible, and well managed places, buildings and public spaces. The design of new development will have contributed to and enhanced the distinctive townscape and character of heritage features within communities.

Objective 15: Community well-being

By the end of the plan period, implementation of the plan's policies will have helped to reduce crime levels and minimise the potential results of terrorist activity by improving the design of new development. The potential risk to nearby populations from hazardous installations will have been minimised by the designation and enforcement of appropriate stand-off zones. Decisions on the location and type of development will have helped to reduce pollution levels in the borough's air, land and water and will have taken account of the borough's legacy of former coal mining activity.

Objective 16: Waste management

By the end of the plan period, a strategic waste management facility will have been provided to deal with the borough's forecast needs. Implementation of the plan's policies, or those of joint plans covering the borough, will have promoted a reduction in waste levels by utilising waste as a raw material for industry and energy production and by encouraging increased recycling rates.

<u>Infrastructure</u>

Objective 17: Infrastructure delivery

By the end of the Plan period, the necessary utility infrastructure to support new development will have been provided in appropriate locations. Local community services will have been provided or existing services enhanced in keeping with the scale of planned new development in each community.





## **Screening Assessment**

Given the distances involved between Rotherham and Natura 2000 sites, the only significant issues relevant to HRA Screening are regarding potential cumulative and secondary impacts. Therefore, we have not conducted a policy-by-policy screening exercise, but rather considered the Local Plan as a whole (all policies acting together, including the Core Strategy).

The HRA Screening of the Core Strategy identified three key aspects of the Local Plan which could potentially lead to effects on Natura 2000 Sites. This assessment is equally relevant to the Sites and Policies document. These aspects have been reviewed and translated for the Sites and Policies document, and are:

- 1. <u>Proposed Site Allocations / Safeguarded Land</u>: the development of sites can lead to land take / habitat loss, and thus impacts on bird species populations which are functionally linked to the European sites' designated bird populations. Birds in Rotherham may be either over-wintering from European sites, or have population cross-over / inter-breeding with populations within the European sites;
- 2. Policies SP1, SP11, SP12, SP13 and SP14 (combined with Core Strategy Policies CS1, CS2 and CS6): growth of housing regionally combined with overall regional population growth can lead to different types of recreational pressure, including dog-walking (which can cause various types of impacts, including bird mortality and nest destruction), off-road cycling and vehicles (which can damage habitats), and other issues;
- 3. Policies SP1, SP11, SP12, SP13, SP14, SP15, SP16 and SP17 (combined with Core Strategy Policies CS1, CS2, CS6 and CS9): growth of housing and employment land uses leading to increased water abstraction or increased runoff and thereby increased downstream flood risk.

Regarding Issue 1 above, it was considered that the potential for indirect effects on Denby Grange Colliery Ponds SAC via any potential impact on great crested newt (*Triturus cristatus*) populations within the borough was negligible and thus insignificant, given the distances involved. In addition, both legislative and policy protections at the project level are considered adequate to avoid a significant effect on great crested newt populations within the borough.

Issues 1, 2 and 3 above have been considered to be adequately mitigated by the policies in both the Sites and Policies document and the Core Strategy. The analysis for the Sites and Policies document which supports this conclusion is set out below.

## Issue 1: Landtake / Habitat Loss and Impacts on Bird Populations

Table 2 below shows the Natura 2000 sites potentially affected by any indirect impact on relevant bird populations within Rotherham Borough.

Table 2: Sites and Policies document HRA issue No.1 & Natura 2000 site conditions

Natura 2000 Sites	Relevant Condition Needed to Support Site Integrity
Peak District Moors (South Pennine Moors Phase 1) SPA Thorne and Hatfield Moors SPA	Protection of bird populations. Species with relevant sightings in Rotherham: Caprimulgus europaeus (nightjar) Circus cyaneus (hen harrier) Falco columbarius (merlin) Pluvialis apricaria (golden plover)

Information on bird sighting locations from Rotherham's Biological Records Centre has been mapped alongside the proposed residential and employment allocations, and proposed safeguarded land. Records date as far back as 1844 and vary in level of detail, and therefore only those which are a relatively reliable representation of the current situation can be used (recognising that the result is still indicative, and subject to annual and seasonal variation). This has been achieved by:

1. Filtering out data older than the past 13 years, while concentrating on data from the past 5 years;





- 2. Filtering out data with a grid reference of less than 1 km accuracy (i.e. data with 10 km grid square references was not used);
- 3. Checking references to locations against the grid references; and
- 4. Filtering out data with no bird count information.

Figure 2-A.12 in Volume 2 presents the mapped data as described above.

While data from the year 2000 onwards was applied, proposed allocations and safeguarded land were checked against pre-2000 data to identify any additional areas of potential interest.

Figure 2-A.12 in Volume 2 highlights proposed allocations and safeguarded land which overlap with significant bird sightings. This information has been used in order to 'audit' the site-by-site assessment which has been carried out as part of the Sustainability Appraisal / Integrated Impact Assessment for HRA considerations. This audit is part of the HRA Screening analysis.

As a result of this analysis, the following species have been found to have no significant links with proposals under the Sites and Policies document (other than the potential for habitat enhancement) due to the insignificant presence of the species in or near allocations:

- Caprimulgus europaeus (nightjar);
- Circus cyaneus (hen harrier);
- Falco peregrinus (peregrine); and
- Falco columbarius (merlin).

The analysis shows that there are a number of records of wintering golden plover in or near allocations. The loss of wintering / migrating sites for golden plover could conceivably cause adverse effects on the Peak District Moors SPA (where they are an Annex 1 feature as a breeding population) if there was a functional link between the SPA breeding population and the wintering population in Rotherham. However, as these birds records are some distance from the SPA and separated by extensive urban areas, it is considered that there is no functional link between the allocations used by wintering/migrating golden plovers and the SPA.

### Issue 2: Regional Recreational Pressure

Table 3 below shows the Natura 2000 sites potentially affected by any indirect impact on habitats via recreational pressure generated by growth of housing in Rotherham Borough.

Table 3: Sites and Policies document HRA issue No.2 & Natura 2000 site conditions

Natura 2000 Sites	Relevant Condition Needed to Support Site Integrity
Thorne and Hatfield Moors SPA Peak District Moors (South Pennine Moors Phase 1) SPA South Pennine Moors SAC	Maintenance of habitats, minimal and well managed recreational pressure
Denby Grange Colliery Ponds SAC Hatfield Moor SAC	
Birklands and Bilhaugh SAC	

The potential for significant adverse effects to the integrity or nature conservation objectives of the Natura 2000 sites above from Policies SP1, SP11, SP12, SP13 and SP14 (combined with Core Strategy Policies CS1, CS2 and CS6) is considered to be offset by a number of other Local Plan policies.

The recreational demand generated will be directed towards provision of green infrastructure and green space within the borough. Towards this aim, the Council requires:





- SP35: Green Infrastructure and Landscape
  - "The Council will require proposals for all new development to support the protection, enhancement, creation and management of multi-functional green infrastructure assets and networks including landscape, proportionate to the scale and impact of the development and to meeting needs of future occupants and users."
- SP40: New and Improvements to Existing Green Space
  - "Development schemes of 36 dwellings or more should normally provide 55 square metres of Green Space per dwelling on site where necessary to ensure that all new homes are... Within 280 metres of a Green Space; ideally within 840 metres of a Neighbourhood Green Space (as defined in the Rotherham Green Space Strategy 2010); and within 400 metres of an equipped play area."
  - "In all cases where new Green Space does not have to be provided on site, then developer contributions will be sought to enhance existing Green Space based on an assessment of need within the local area at the time of any planning application."; and
  - "either (i) provision for maintenance by a landscape management company or similar, to standards agreed with the Local Authority for the lifetime of the development, or (ii) a financial contribution by way of a commuted sum equivalent to the cost of maintaining new Green Space or enhancements to existing Green Space for a period of thirty years."

There are also links with Policy SP36 and with policies of both the Core Strategy and Sites and Policies document which aim to create an accessible borough by walking, cycling and public transport.

The policies should therefore provide adequate recreational space for the new developments and should not lead to any significant increase in disturbance to any European sites directly. As the Rotherham populations of designated species (e.g. wintering golden plover) are not functionally linked with the SPA populations, any localised increase in disturbance to sites within Rotherham should not adversely affect the SPAs indirectly.

Given these considerations, the Sites and Policies document (and Local Plan as a whole) is not likely to lead to a significant effect on the nature conservation objectives of the identified Natura 2000 sites.

## **Issue 3: Water Environment Pathways**

Table 4 below shows the Natura 2000 sites potentially affected by any indirect impact on habitats or wildlife via water environment impacts generated by growth of housing and employment development in Rotherham Borough.

Table 4: Sites and Policies document HRA issue No.3 & Natura 2000 site conditions

Natura 2000 Sites	Relevant Condition Needed to Support Site Integrity
Thorne and Hatfield Moors SPA Hatfield Moor SAC	Sites require sustainable water resource management

The likelihood of significant effects on the nature conservation objectives of the Natura 2000 sites above from Policies SP1, SP11, SP12, SP13, SP14, SP15 and SP16 (combined with Core Strategy Policies CS1, CS2, CS6 and CS9) is considered to be offset by a number of other Local Plan policies.





The mitigating policies of the Core Strategy will apply equally to the Sites and Policies document. This includes Policy CS24, which says:

The Council will adopt a pro-active approach to managing the water environment which seeks to ensure that new development is not subject to unacceptable levels of flood risk, does not result in increased flood risk elsewhere and, where possible, achieves reductions in flood risk overall.

The Council will seek to ensure that any proposal:

... Improves water efficiency through incorporating appropriate water conservation techniques including rainwater harvesting and grey-water recycling...

The extent and impact of flooding will be reduced by:

- Requiring that all developments significantly limit surface water run off
- Requiring the use of Sustainable Urban Drainage Systems or sustainable drainage techniques on all sites where practical and feasible

Abstraction may not be essential for projects to be developed. Also, there is water available for abstraction in the Lower Rother and Middle Don CAMS areas which would be subject to appropriate licensing. The Yorkshire Water and Severn Trent Water Resource Management Plans (WRMPs) account for such important attributes as climate change, population growth, increases in housing and the demand from industry. In the Yorkshire Water region, all three water resource zones show a surplus throughout the 25-year planning horizon. The East Midlands water resource zone of the Severn Trent WRMP is forecasted to have a water supply deficit without intervention, and new schemes and further leakage reduction is planned in order to meet this long-term deficit.

As a result, no significant effect on Natura 2000 sites is expected.

For the above reasons, we consider that there are no likely significant effects on Natura 2000 sites and therefore an Appropriate Assessment is not required of the Sites and Policies document before adoption.

If you wish to discuss this matter further, please contact me on direct dial, 01709 823831 in the first instance.

Yours sincerely

Helen Sleigh

Senior Planning Officer, Forward Planning Environment and Development Services

# 1-E.2 HRA Screening Determination

The consultation response from Natural England is shown overleaf.

Date: 06 November 2015

Our ref: 166746

Your ref: Click here to enter text.

Planning.policy@rotherham.gov.uk

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### BY EMAIL ONLY

Dear Sir/Madam

Planning consultation: Rotherham Sites and Policies Publication DPD and associated Integrated

Impact Assessment **Location:** Rotherham

Thank you for your consultation on the above dated 25 September 2015 which was received by Natural England on 25 September 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England recognises that comments at this stage of the plan making process should be based on the Tests of Soundness as set out in paragraph 182 of the National Planning Policy Framework (NPPF). Having reviewed the policies and allocations within the DPD Natural England considers it broadly compliant with national policies that seek to conserve and enhance the natural environment. We have set out below a number of amendments which will enable your authority to ensure that the plan meets the tests of soundness. These are set out below:

# Comments on the Sites and Polices DPD by paragraph and Policy

- 2.2 Natural England supports the 'conservation and enhancement for wildlife, geology and landscape, it provides for the protection and expansion of our green infrastructure and it will ensure that development incorporates best practice for green design...' As a part of this we would expect the plan to also protect and enhance public rights of way and access in line with paragraphs 75 and 114 of the National Planning Policy Framework (NPPF).
- 2.3 The hierarchy is the avoid, mitigate, compensate hierarchy and we support this as an approach in the with the NPPF.
- 3 Policies Map. The Draft Policies Map depicts Scheduled Monuments and SSSIs under the same heading of "Statutorily Protected Sites". Natural England supports the Plan identifying these assets, given that the considerations that need to be taken into account when determining planning applications affecting these assets are different and that the Plan contains separate Policies for them. We recommend that SSSIs are separated and clearly distinguished from Scheduled Monuments on the Policies Map.



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Policy SP5 Explanation. Natural England notes that the policy makes reference to 'All proposals affecting a heritage asset will require careful assessment as to the impact and appropriateness of such changes to ensure that the historic, architectural, **natural history**, or landscape value of the building...'. We recommend that the supporting text includes reference to Natural England's published <u>Standing Advice</u> on protected species. The Standing Advice includes a habitat decision tree which provides advice on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

Policy SP7. It would be useful to cross reference policy SP39 Soil Resources in the explanatory test in order that consideration is given to the impact on Best and Most Versatile Agricultural Land.

Policy SP35. Natural England supports the inclusion of this policy and it would be helpful for the supporting text to direct developers towards the relevant local and national Biodiversity Action Plans as important sources of information to consider.

4.153. This paragraph should also refer to the public rights of way and other access provision as these are also key elements of the Borough's green infrastructure.

Policy SP36. Natural England supports this policy and recommends it should be re-titled 'Conserving and **Enhancing** the Natural Environment'.

'Planning permission will not be granted for development that is likely to, directly or indirectly, result in the loss or deterioration of sites, habitat or features that are considered to be irreplaceable due to their age, status, connectivity, rarity or continued presence.' This criterion on the policy is in line with paragraph 118 of NPPF, but needs to reflect it further by recognising that to be the case 'unless the need for, and benefits of, the development in that location clearly outweigh the loss.'

We would further recommend that policy explicitly seeks to ensure all planning proposals contribute towards the delivery of the Government's Biodiversity 2020 strategy as noted in our response on the Final Draft Sites and Policies DPD dated 13 November 2014.

Policy SP37. Natural England supports inclusion of this policy. We recommend the following amendments to the policy:

'Development or changes of use on land within or outside a statutorily protected site (either individually or in combination with other developments) which would adversely affect the **notified features**, fabric or setting of the statutorily protected site will not be permitted.' This gives greater clarity in terms of assessing potential impacts and is line with paragraph 118 of NPPF.

4.174 This paragraph needs to be aligned with the paragraph 118 of the NPPF to make it clear what might constitute an exceptional circumstance. It should also reflect paragraph 119 of NPPF and the presumption in favour of sustainable development not applying where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.

Policy SP38. Natural England recommends this policy be reworded:

'Planning permission for development likely to have a direct or indirect adverse impact on the following will only be granted if they can demonstrate the need for the development in that location, **no alternative** and that mitigation and/or compensation measures can be put in place that enable the status of the species to be maintained or enhanced:'.



The supporting text also needs to explain that developments adversely affecting European or nationally protected species will also require a licence from Natural England and these must be applied for after planning permission is granted.

4.186. Natural England welcomes the reference to 'for new, or enhancing existing provision, consideration should also be given to other forms of green space or green infrastructure which include more diverse character areas such as woodlands, wildlife conservation areas...' which is in line with paragraph 118 of NPPF's requirement to encourage incorporation of biodiversity in and around developments.

Policy SP41. Natural England welcomes inclusion of this policy.

Policy SP42. This policy should also recommend opportunities to incorporate biodiversity in and around developments which is in line with paragraph 118 of NPPF's requirement to encourage incorporation of biodiversity in and around developments. Biodiversity can be an integral part of the design of greenspaces.

Policy SP51. Natural England supports the intention that applications for minerals developments will be assessed against the potential impact they might have upon the Borough's landscape character and its heritage assets, biodiversity and geodiversity resources, ecological networks or features of importance for wildlife. This consideration is essential if the distinctive character of Rotherham is to be maintained. We also support the criteria relating to the impact on the best and most versatile agricultural land.

Policy SP53. Natural England recommends that this policy is re-worded to reflect the avoid, mitigate hierarchy:

'c. infrastructure and associated facilities are sited in the least sensitive location from which the target resources can be accessed, so as to **avoid** the environmental and ecological impact of development wherever possible;

d. any adverse impacts can be mitigated to an acceptable level, with safeguards to protect environmental and amenity interests put in place as necessary; '

Policy SP54. Natural England recommends that this policy is re-worded to reflect the avoid, mitigate hierarchy:

'c. infrastructure and facilities are justified in terms of their number and extent, sited in the least sensitive location from which the target resources can be accessed, and designed and operated to **avoid or** minimise environmental and amenity impacts'.

Policy SP58. Natural England supports this Policy which sets out a robust framework for the promotion of high-quality design and the reinforcement of local distinctiveness and is line with paragraph 118 of NPPF for encouraging '...biodiversity to create visually attractive high quality development'. This will help to ensure new development contributes towards the creation of a high-quality environment.

Policy SP63. Natural England supports this policy, especially criterion b.

5.7 to 5.9. Natural England welcomes the use of ecological information to inform the identification of allocations.

Section 5. Natural England notes that a number of allocations are in sensitive locations, such as within or adjacent to Local Wildlife Sites. Paragraph 110 of NPPF states that *'Plans should allocate land with least environmental or amenity value, where consistent with other policies in this* 



Framework'. We support the need for further assessment of ecological, landscape and impacts on green infrastructure to be undertaken as set out in the site development guidelines. The Council will need to ensure in all such cases that appropriate avoidance, mitigation or, as a last resort, compensation measures are put in place.

- H4. Natural England welcomes the site guidelines given the proximity of the SSSI.
- H83. Natural England welcomes the site guidelines given the proximity of the SSSI and recommend the incorporation of the additional text below:
- 'There needs to be ecological assessment to inform development potential or consideration of boundary amendment.

The site is also adjacent to Anston Stones Wood Local Wildlife Site and Site of Special Scientific Interest and construction of any roads, tracks, walls, fences, hardstanding, ditches or other earthworks, or laying of pipelines and cables above or below ground within SSSI (Anston Stones Wood) site boundary must be undertaken in consultation with Natural England. Recreational disturbance can be an issue for the site - appropriate provision of on / off site open space must be sufficient to offset potential disturbance issues and ensure that development does not facilitate access by recreational vehicles. **These would need to be secured as part of any future development proposal.** Natural England should be consulted on planning application.

E23 and H70.' The site is also close to a Site of Special Scientific Interest (SSSI). Construction of any roads, tracks, walls, fences, hardstanding, ditches or other earthworks, or laying of pipelines and cables above or below ground within site boundary must be undertaken in consultation with Natural England. Recreational disturbance can be an issue for the site. Any potential hydrological or air pollution impacts on the SSSI (Maltby Low Common) will require investigation and, where appropriate, mitigation before planning permission will be granted. Opportunities should be considered to extend the range of calcareous, neutral and acid grassland features through integrating natural green space into developments.' Again it is important that impacts on the SSSI are avoided, or where that is not possible appropriate mitigation measures are secured.

# **Comments on the Integrated Impact Assessment (IIA)**

Natural England considers the IIA and its incorporated Strategic Environmental Assessment (SEA) compliant with the legal requirements on the SEA Directive and national Regulations.

Natural England concurs with the findings of the HRA screening assessment. We are satisfied that there will be no likely significant effects on European sites of importance for nature conservation as measures are in place through the plan to ensure impacts will not occur. An Appropriate Assessment is not required of the Sites and Policies document before adoption.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter <u>only</u> please contact Richard Hall on richard.hall@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully









# **Appendix 1-F SEA Regulations Compliance Checklist**

SEA R	egulations Requirement	Where Found in IIA Report		
Regulation				
12-(2) The report shall identify, describe and evaluate the likely significant effects on the environ				
	(a) implementing the plan or programme; and	Volume 2, Chapter 4 Volume 3, Chapters 3 through 16		
	(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.	Volume 2, Chapter 4 Volume 3, Chapter 2		
12-(3)	The report shall include such of the information referred to in Schedule 2 to t may reasonably be required	hese Regulations as		
Informa	ation referred to in Schedule 2, as required through Regulation 12-(3)			
1.	An outline of the contents and main objectives of the plan or programme and of its relationship with other relevant plans and programmes.	Volume 1, Chapter 2		
2.	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Volume 1, Chapter 5		
		Volume 3, Chapters 3 – 16, Section N.2 where N = the chapter number.		
3.	The environmental characteristics of areas likely to be significantly affected.	Volume 2, Chapter 4, Section 4.X.2, where X = sections 2-12 for each settlement area.		
4.	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to	Volume 2, Appendix 2-D, Section 2-D.2 – SA of Individual Sites		
	Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.	Volume 2, Appendix 2-C, Sections 2-C.1.2 and 2-C.2.2.		
		Volume 2, Appendix 2-F		
5.	The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Volume 1, Chapter 4		
6.	The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—	Volume 2, Chapter 4 Volume 3, Chapters 3 through 16		





SEA Regulations Requirement			Where Found in IIA Report
	<ul><li>(a) biodiversity;</li><li>(b) population;</li><li>(c) human health;</li><li>(d) fauna;</li><li>(e) flora;</li><li>(f) soil;</li><li>(g) water;</li><li>(h) air;</li></ul>	<ul> <li>(i) climatic factors;</li> <li>(j) material assets;</li> <li>(k) cultural heritage, including architectural and archaeological heritage;</li> <li>(l) landscape; and</li> <li>(m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).</li> </ul>	
7.	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.		Volume 2, Chapter 4 Volume 3, Chapters 3 through 16
8.	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.		Volume 2, Chapter 4 Volume 3, Chapter 2
9.	A description of the measures envisaged concerning monitoring in accordance with regulation $17[^7]$ .		Volume 3, Chapter 17
10.	A non-technical summary of the information provided under paragraphs 1 to 9.		Separate Document

<sup>&</sup>lt;sup>7</sup> "The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action" (Regulation 17-(1)).