

## Text for Section 5 of the Form

The SA shows a flawed process for the following reasons:

- An inadequate SA Framework.
- The reasons for the selection and rejection of sites has not been outlined within the SA report contrary to the Regulations and Guidance.
- The key findings of the consultations and how they have been taken into consideration, particularly the Statutory Consultees, have not been included within the SA report or NTS.
- The SA of the sites is not linked to any evidence base. It is assumed further studies at the planning application will identify the effects.
- There are discrepancies in the scoring and assessment of sites. The absence of any evidence means that the results cannot be verified.
- The likely significant effects of implementing the plan and the reasonable alternatives have not been **identified, described or evaluated** in accordance with the Regulations (Environmental Assessment of Plans and Programmes Regulations 2004)
- The viability and deliverability of the proposals have not been assessed contrary to the NPPF.
- The failures in the SA process mean that the Plan cannot be found sound.

## Text for Representations

The SA shows a flawed process for the following reasons:

- The SA Framework is inadequate. Two of the sustainability objectives are not considered suitable by the County Council for use in the assessments. More appropriate objectives should have been identified. The objectives also do not address the viability or deliverability of the proposals.

“The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented.” **NPPG Paragraph: 018 Reference ID: 11-018-20140306**

- The SA has not complied with the guidance above. The reasons for the selection and rejection of the sites have not been outlined in the SA report or Non-Technical Summary (NTS). The reader cannot determine why decisions have been made. The Appendix II referred to as the place where the information can be found only provides the site assessment forms. No explanation of why sites have been selected or rejected is given. This omission means that the SA has failed to comply with both the Regulations (Environmental Assessment of Plans and Programmes Regulations, 2004) and the NPPG.
- The findings of the consultations have also not been explained within the SA report or NTS, particularly the responses from the Statutory Consultees. It is not clear how the responses have informed the Plan and it fails to show an integrated process.

- There are several discrepancies and omissions in the scoring and assessment of the sites. For example, on the Site Assessment Form (Appendix II), the initial assessment states that there is no harm to heritage assets but the detailed site assessment provided below recognises that there would be a negative impact. The commentary demonstrates that further investigation of this issue has not been carried out to support the results. The absence of any evidence means that the results cannot be verified. The assessment fails to provide sufficient information to identify the likely significant effects.

“An environmental report for the purpose of the regulations must **identify, describe and evaluate** the likely significant effects on the environment of implementing the Local Plan policies and of the reasonable alternatives taking into account the objectives and geographical scope of the Local Plan. The sustainability appraisal report must clearly show how these requirements have been met as well as recording the wider assessment of social and economic effects.” **NPPG Paragraph: 019 Reference ID: 11-019-20140306 [emphasis added]**

- The SA fails to link the results to any evidence base. It is assumed further studies at the planning application will identify the effects. The SA’s key purpose is to identify, describe and evaluate the likely significant effects of implementing the plan. The necessary studies and evidence to support the likely impacts are clearly absent. The SA has therefore failed in its key purpose.
- It is not clear from the SA how the geographical scope of the Plan has been taken into consideration when considering the effects, contrary to the Regulations and Guidance.
- The viability and deliverability of the proposals have not been assessed contrary to the NPPF. This failure is linked to the inadequate SA framework, which has not identified suitable sustainability objectives.
- The serious failures in the SA process mean that the Plan does not comply with the Regulations and Guidance and can therefore not be found sound.