

Plan for the Borough of Wellingborough – Part 2 Local Plan Examination

Matter 2 – Sustainability Appraisal (SA)
and Habitats Regulation Assessment
(HRA)

Date: March 2018

1. Introduction

- 1.1 This statement provides the response of the Borough Council of Wellingborough (BCW) to the following issues and questions raised by the Inspector relating to Matter 2 of the examination into the Plan for the Borough of Wellingborough.

Matter 2 - Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA)

- 2.1 *Is the Plan supported by the SA and HRA?*
- 2.2 *What evidence is there that the SA has influenced the Plan and/or considered realistic alternatives?*
- 2.3 *Do any adverse effects identified in the SA require significant mitigation, and how does the Plan address these issues?*

- 1.2 References used in this statement (e.g. CON 1) relate to documents held in the examination library available on the council website on the [examination page](#).

2. Response of the BCW to the specific questions relating to Matter 2

2.1 *Is the Plan supported by the SA and HRA?*

- 2.1 The plan is supported by both a SA ([SA 1](#)) and HRA ([HRA 1](#)), which were undertaken by consultants AECOM (formerly URS) who also produced the SA ([SA 4](#)) and HRA ([HRA 2](#)) of the Emerging Draft Plan. AECOM also produced these documents to support the North Northamptonshire JCS ([JCS 1](#)). The relevant documents in the examination library ([SA 1](#), [2](#), [3](#) and [HRA 1](#) and [2](#)) demonstrate that the plan is supported by and has been robustly tested at relevant stages in its preparation.

2.2 *What evidence is there that the SA has influenced the Plan and/or considered realistic alternatives?*

- 2.2 Sustainability Appraisal has been undertaken at all key stages of the plan preparation to ensure that realistic alternatives have been considered as the plan has been developed (this is illustrated in figure 1 overleaf). The development of the JCS was also informed by consideration of reasonable alternatives, including alternative options to the spatial strategy, including a dispersal option and this significantly influences the scope of alternatives for the PBW and what is a realistic alternative for a Part 2 Plan. This is clearly recognised in the SA. The JCS Inspector concluded at para 11 of his report (JCS 2) *“Also taking into account all the responses to the public North Northamptonshire Joint Core Strategy Local Plan, Inspector’s Report June 2016 - 6 - consultation on the Addendum published with the main modifications (EXAM 10), I am satisfied that the SA/SEA process for this Plan (SUB 11) has been suitable and appropriate in its coverage and conclusions, including regarding the necessary consideration of reasonable*

alternatives at each relevant stage, such as the dispersal of growth across the area rather than an urban focus on the Growth Towns. Overall, therefore, the SA/SEA process for this plan has been satisfactory”.

Figure 1: Plan for the Borough of Wellinborough Local Plan Timeline with SA outputs

Plan milestone	Scoping and Issues and Options	Consultation on the Emerging PBW	Consultation on Publication PBW
Dates	2014-2015	15 April 2016-27 ^h May 2016	20 September 2017- 3 November 2017
SA Outputs	SA Scoping published July 2014	SA Report of Emerging Plan (Dec 2016)	SA Report (June 2017) Non-Technical Summary (NTS)

- 2.3 The rationale for establishing what alternatives are reasonable is set out in Chapter 8.2. (for housing growth and distribution, section 9.2 (for rural housing growth and distribution, Section 10.2 (for site options) of [SA 1](#). The council’s reasons for selecting or discarding alternatives are also included within these discussions. Section 11 sets out the consideration of alternatives for other plan issues.
- 2.4 The council’s response to the main representations to the SA, and its consideration of reasonable alternatives is set out in paragraphs 3.5-3.12 of [CON 9](#).
- 2.5 It is clear within the SA, how it has influenced the plan. Paragraph 17.1.1. of the SA sets out that as the plan was being developed, the draft policies were subjected to SA, and a small number of mitigation and enhancement measures were suggested through the SA. Table 17.1 sets out the measures suggested through the SA. The council considered these recommendations alongside comments received through consultation on the emerging draft Plan. The council’s response to the issues identified is set out in Table 17.1 of the SA.

2.3 Do any adverse effects identified in the SA require significant mitigation, and how does the Plan address these issues?

- 2.6 None of the adverse effects identified in the SA require significant mitigation. Para 17.1.2 of the SA sets out that *“Generally, the draft Local Plan has been positively prepared and links well to the JCS. There was little scope for suggesting mitigation measures, as no significant negative effects were identified. However, there was some scope for enhancement of positive effects, as well as mitigation where not significant negative effects were identified.”* As set out at paragraph 2.5 of this report, these mitigation measures were considered during the development of the plan.
- 2.7 The potential impact of growth on the Upper Nene Valley Gravel Pits SPA ([ENV 9](#)) was extensively considered during the preparation and examination of the JCS and a Mitigation Strategy ([ENV 10](#)) has been produced and adopted by the council. Money is

now being collected and spent on delivering the mitigation through both S106 contributions and payments through Section 111 of the Local Government Act 1972. Para 1.1.2 of [HRA 1](#) discusses the oversupply of housing provision in the PBW relative to the JCS requirement and considers the potential impact on the Upper Nene Valley Gravel Pits SPA setting out: *“However, the Council have been able to confirm that the total quantum of net new dwellings within 3km of the Nene Valley Gravel Pits SPA and Ramsar site over the plan period has decreased slightly compared to that assumed in the adopted SPA Mitigation Strategy: from 1,792 to 1,390 in the March 2017 housing trajectory (see Appendix C). This is important because 3km was established in the JCS HRA as the zone within which a net increase in dwellings could affect the integrity of the SPA ‘in combination’ without mitigation, and the adopted SPA Mitigation Strategy was devised to cater for 1,792 net new dwellings within this zone in the Borough of Wellingborough. Since the number of net new dwellings within the 3km zone has not increased, it is therefore not necessary for this strategic ‘in combination’ issue to be reinvestigated and the HRA for the North Northamptonshire Joint Core Strategy and the SPA Mitigation Strategy can continue to be relied upon.”*

- 2.8 Natural England’s response to the HRA and SA on pages 6-7 of [CON 8](#) confirms that they are satisfied that the uplift in housing numbers doesn’t have a significant impact on the SPA and the adopted mitigation strategy is still sufficient to mitigate impacts from the increase in residents in the vicinity of the SPA leading to recreational disturbance.