

Appendix B

Sustainability Appraisal implications of having no Core Strategy

The SEA Directive requests that we consider the how the environment would fare if there was no Core Strategy. It requires we consider:

“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.”

The baseline data and trends are included in each of the Topic Papers that support the Core Strategy and assisted the initial Scoping Report.

Without the Core Strategy, Wigan would continue along the route of the Unitary Development Plan. However, the UDP runs only until 2016 and naturally for a document produced in 2006, is out of date with key issues and policy changes.

The UDP primarily considered land use planning which is narrow in its approach – concentrating mainly on how we develop and use land. The Local Development Framework – although building on that initial UDP work – goes further and considers the whole “spatial planning” approach seeking to address issues such as health, education, crime, environmental sustainability and accessibility.

Should we continue to take the approach of the UDP, there would be an increasing disconnect between land use and wider socio-economic and environmental issues. The local environment would not be degraded as such, but Wigan would not be making best use of the environment as an asset.

One clear example is the use of greenspace for tackling climate change. Greenspace not only serves to protect an area – through shading – from increased heat, but also acts as a carbon store. Recognising this ensures that the planning process considers the wider impacts of development.

Sustainability Appraisal (SA) Objective	Broad implications of not implementing the Core Strategy (based on SA undertaken)
SA1 Biodiversity	The benefits of different policies enhancing biodiversity may be lost.
SA2 Air Quality	There would be little difference although the opportunity to target air quality problem areas may be lost.
SA3 Soil & Minerals	Development may not be diverted away from soil resources. However, there may be some benefit as housing, employment and transport policies could all impact on soil and mineral resources.

SA4 Water	Water would become more stressed due to the impact of undirected development such as housing, employment uses and transport – particularly regarding changes in run-off.
SA5 Landscapes	Landscapes may not be considered as assets beyond aesthetics by development.
SA6 Buildings	Little impact although the opportunity to influence high quality may be lost.
SA7 Crime & Safety	Whilst there may be no direct impact, policies that work together to address the structural problems associated with crime and safety may be lost.
SA8 Environmental Quality	Little change although the limited beneficial impacts of policies may be lost.
SA9 Waste	There would be limited difference although we could potentially see the key issue of waste not being considered by development.
SA10 Health	With poor health statistics, there may be major detrimental effects if policies that address the underlying issues are not introduced.
SA11 Recreation	An unstructured approach to development may result in reduced access to recreation facilities and opportunities as other uses are pursued and the supporting infrastructure is not developed.
SA12 Housing	We may not be able to deliver on the borough's housing needs.
SA13 Education	The structural issues that underpin educational attainment and skills development may be lost.
SA14 Community	There may be limited focus on the needs of specific communities and the cumulative impacts on communities of development.
SA15 Energy & Climate Change	Some barriers to energy schemes may be removed – especially around safeguarding wildlife and other land uses – although at the same time, the specific inclusion of energy and climate change as a key issue for development may be lost.

SA16 Accessibility and Transport	As most policies aim to address accessibility in some way, we may not improve sustainable travel and accessibility.
SA17 Sustainable Economy	The need to ensure economic development is sustainable – economically, environmentally and socially – may not be realised without the policies to back it up.
SA18 Economy	We may jeopardise the economic chances of Wigan borough if we do not bring clarity to the planning process – something which developers demand.

Comparisons with the Unitary Development Plan

Determining the difference between the two approaches can be done by comparing the sustainability appraisal for the UDP with the one carried out for the Core Strategy. They are not directly comparable as they cover different policies but we have attempted to make some comparison. The following explains that process.

The Unitary Development Plan contains 19 criteria upon which the sustainability appraisal was made. These were:

- Criterion 1 – Sustainable Regeneration and Development
- Criterion 2 – Sustainable Transport
- Criterion 3 – Environmental and Social Responsibility
- Criterion 4 – Image
- Criterion 5 – Bio-Diversity
- Criterion 6 – Pollution
- Criterion 7 – Climate Change
- Criterion 8 – Natural Resources
- Criterion 9 – Minerals
- Criterion 10 – Waste Management
- Criterion 11 – Built Environment Conservation
- Criterion 12 – Housing
- Criterion 13 – Crime and Disorder
- Criterion 14 – Social Inclusion
- Criterion 15 – Skills and Knowledge
- Criterion 16 – Community Involvement
- Criterion 17 – Poverty
- Criterion 18 – Health
- Criterion 19 – Economic Prosperity

The Sustainability Appraisal of the Core Strategy identifies 18 separate sustainability objectives which are:

- SA1 Biodiversity
- SA2 Air Quality
- SA3 Soil & Minerals
- SA4 Water
- SA5 Landscapes
- SA6 Buildings
- SA7 Crime & Safety
- SA8 Environmental Quality
- SA9 Waste
- SA10 Health
- SA11 Recreation
- SA12 Housing
- SA13 Education
- SA14 Community
- SA15 Energy & Climate Change
- SA16 Accessibility and Transport
- SA17 Sustainable Economy
- SA18 Economy

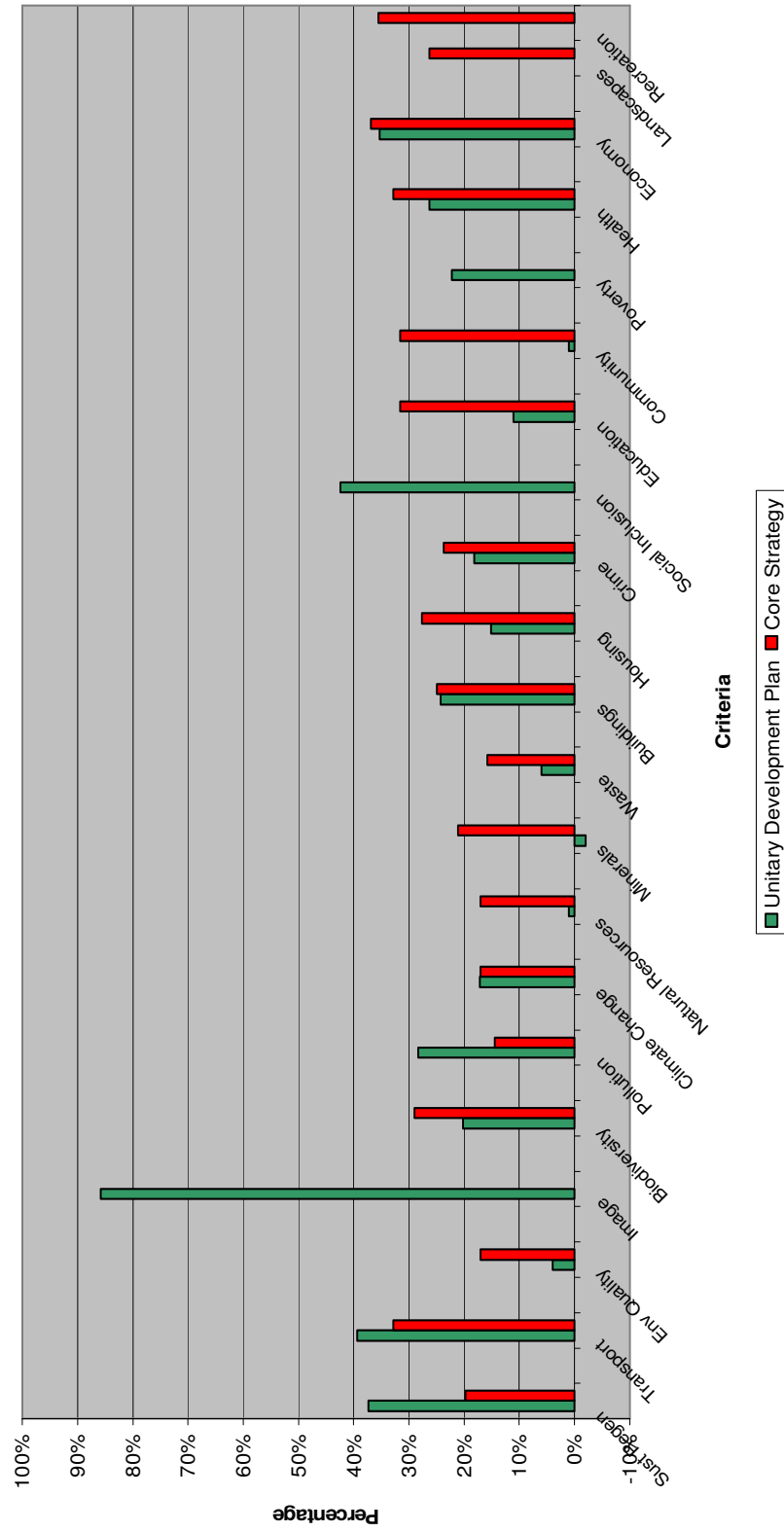
These two sets of criteria have been assessed against each other and the following matches made:

UDP SA Criterion	Core Strategy SA Objective
Criterion 1 – Sustainable Regeneration and Development	SA17 Sustainable Economy
Criterion 2 – Sustainable Transport	SA16 Accessibility and Transport
Criterion 3 – Environmental and Social Responsibility	SA8 Environmental Quality
Criterion 4 – Image	
Criterion 5 – Bio-Diversity	SA1 Biodiversity
Criterion 6 – Pollution	SA2 Air Quality
Criterion 7- Climate Change	SA15 Energy & Climate Change
Criterion 8 – Natural Resources	SA4 Water
Criterion 9 - Minerals	SA3 Soil & Minerals
Criterion 10 – Waste Management	SA9 Waste
Criterion 11 – Built Environment Conservation	SA6 Buildings
Criterion 12 – Housing	SA12 Housing
Criterion 13 – Crime and Disorder	SA7 Crime & Safety
Criterion 14 – Social Inclusion	
Criterion 15 – Skills and Knowledge	SA13 Education
Criterion 16 – Community Involvement	SA14 Community
Criterion 17 – Poverty	
Criterion 18 – Health	SA13 Education
Criterion 19 – Economic Prosperity	SA14 Community
	SA11 Recreation
	SA5 Landscapes

The “scores” achieved within each Sustainability Appraisal for each criterion were then collated. A percentage total for each criterion was determined – as they were scored in different ways, a percentage is the most reasonable approach. The following graph illustrates the differences.

Commentary

SA Comparison of Unitary Development Plan and Core Strategy



Overall, the Core Strategy has an average score of 25% for each criterion compared to 23% for the UDP. This translates to around an average 10% improvement in sustainability terms.

There were a number of areas not directly comparable. For instance, the UDP SA placed a great emphasis on the image of the borough, and there were specific criteria for social inclusion and poverty. The Core Strategy SA, however, took tackling poverty as an overarching issue for all criteria and not a specific issue in itself. The Core Strategy SA also contained specific criteria related to landscapes and recreation, which were not directly comparable to anything within the UDP SA.

There are areas where the UDP SA scored stronger than the Core Strategy SA – Sustainable Regeneration, Transport and Pollution. This is perhaps reflective of the approach the UDP took. It could be argued that the UDP prioritised economic sustainability over the social and environmental aspects. This is backed by the anomalously high score achieved for ‘image’ and the emphasis placed on economic poverty (criteria covering social inclusion and poverty).

It is clear the Core Strategy is more balanced and overall scores comparatively well in the other areas. Criteria such as use of natural Resources, Minerals (which achieved a negative score within the UDP) and Community Involvement are all very much improved within the Core Strategy.

Caveats

It has been noted that comparing the UDP and Core Strategy Sustainability Appraisals is like comparing apples and oranges and there is some truth in that – they are not directly comparable so assumptions have to be made. Comparing brings a number of problems and there are caveats that should be noted when considering it:

- Each Sustainability Appraisal is subjective and therefore not readily comparable
- Different people carried out the different Sustainability Appraisals
- Different assumptions will have been made based on knowledge and experience at the time
- The national and local policy context will have been different for each Sustainability Appraisal
- One document is ‘building on’ the work of the other
- Different approaches to collating the supporting evidence for the Sustainability Appraisal will have been carried out
- There are Supplementary Planning Documents that further support the UDP and their sustainability appraisals and impact have not been taken into account as they could apply equally under the Core Strategy. Only the main plan has been considered.

Conclusion

The borough would still develop in the absence of the Core Strategy but there would clearly be areas of concern that would prevent the borough from developing in a more sustainable way. The absence of a number of the policies contained within the Core Strategy would be detrimental to progress in a number of key areas covering all aspects of sustainability – economic, environmental and social.

In comparing to Local Plans that have gone before, accepting the caveats that such a comparison requires, we can see that there is an overall improvement for sustainability objectives of the borough and a better balance across the criteria. There is a greater emphasis on achieving a balance between those three aspects of sustainability.

The key point for development is ensuring there is consistency with national policy and clarity at a local level – the considerations above taken with the Topic Papers, reveal that the Core Strategy delivers that. Overall, the borough will develop better, and the environment will improve, with the Core Strategy than without it.