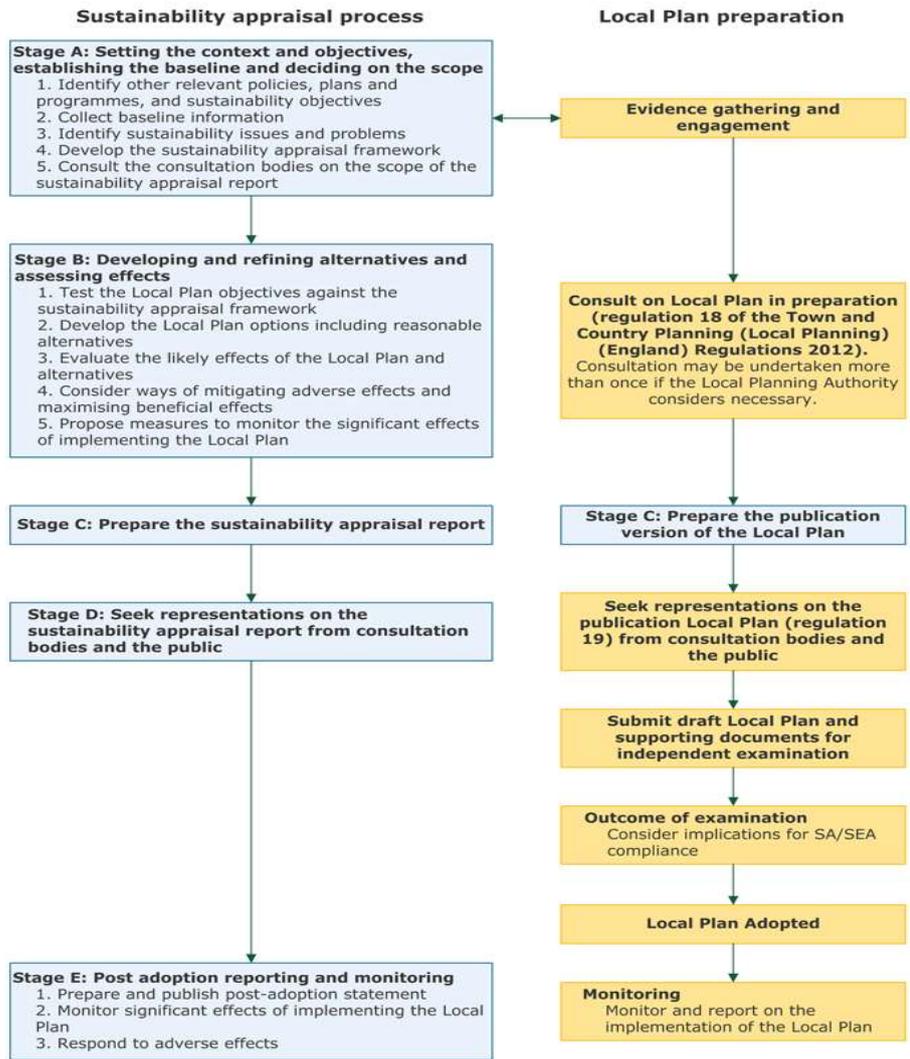


Local Green Space Development Plan Document (LGS DPD) Regulation 18 Consultation – Sustainability Assessment (SA) and Strategic Environmental Assessment (SEA) Stage B Report (Part 1)

What are the requirements for Strategic Environmental Assessment and Sustainability Appraisal?

- 1.1 The Councils are required to prepare a SEA and a SA Report alongside each key Development Plan Document preparation stage.
- 1.2 SEA was introduced through the EU Directive 2001/42/EC, which is transposed into English law via the Environmental Assessment of Plans and Programmes Regulations 2004 (known as the SEA Regulations). SEA seeks to assess the environmental effects of implementing plans or programmes.
- 1.3 SA was introduced through the Planning and Compulsory Purchase Act 2004. This process seeks to integrate social and economic as well as environmental considerations into the assessments of plans and programmes. These are collectively seen as the three components of sustainability.
- 1.4 Government guidance suggests the two processes of SA and SEA are combined to allow for a single appraisal to be carried out which meets all the requirements. The diagram below sets out how SA SEA should be prepared alongside a DPD.



1.5 In a nutshell, the main purpose of the SA SEA process is to show how the principles of Sustainable Development are being integrated into the plan making process and also to assess the policies and proposals in development plans to check if they have any significant negative effect on the environment.

1.6 This document forms the start of Stage B – Developing and Refining Alternatives and Assessing Effects, which works alongside the Regulation 18 stage of the DPD.

1.7 The SA SEA Stage A Report which provides the framework for the assessment of policies and proposals (as set out in the diagram above) can also be seen on the Councils website.

2. What is the Local Green Space Development Plan Document?

2.1 The Local Green Space Development Plan Document (LGS DPD) is being produced following the examination in public and subsequent adoption of the Plymouth and SW Devon Joint Local Plan (JLP) in March 2019. In the Submission Version of the Joint Local Plan, the Councils had set out an approach to LGS which the Inspectors

felt was not justified. The Inspectors set out two options which were either to remove the references to LGS from the JLP or to 're-visit the methodology and designations within the submitted JLP'. The Councils accepted the first option, removed LGS through the Main Modifications process and have now chosen to prepare a specific DPD for LGS.

- 2.2 The production of the DPD will provide an opportunity to facilitate the local community aspirations to protect land in the Plymouth Policy Area through the allocation of Local Green Space. This is considered to be important within the city where there is less opportunity for Neighbourhood Plans to allocate green space. It was felt that this approach was not required within the TTV part of the JLP as communities could use Neighbourhood Plans to designate sites as appropriate.

3. How has the Local Green Space DPD consultation document been assessed through the SA SEA process?

- 3.1 This document forms part of the Stage B Report – Developing and refining alternatives and testing options for the LGS DPD Regulation 18 Consultation. The DPD is likely to go through another stage of Regulation 18 consultation so this report is mainly focusing on the methodology for testing proposed Local Green Spaces as set out in the consultation document (2020).
- 3.2 The Local Green Space DPD Regulation 18 consultation document is seeking views on the methodology and criteria that the Councils are proposing to assess whether or not green spaces in the Plymouth Policy Area should be formally designated as Local Green Spaces.
- 3.3 The consultation document is clear that there are no specific guidelines on the type and size of green space which can be allocated but that they cannot be extensive tracts of land. The proposed methodology for assessing sites for LGS designation is adapted from and in accordance with paras 99 and 100 of the National Planning Policy Framework (NPPF).
- 3.4 Paragraph 99 of the NPPF states 'The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.'
- 3.5 Paragraph 100 states 'The Local Green Space designation should only be used where the green space is:
- a) In reasonably close proximity to the community it serves;

- b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) Local in character and is not an extensive tract of land.'

3.6 Part 6 of the consultation document sets out the assessment methodology under a number of headings:

1. Is there a planning permission or policy allocation conflict with a LGS allocation?
2. Is the site already subject to sufficient designation?
3. Is the site within reasonably close proximity to the community it serves?
4. Is the site local in character and not an extensive tract of land?
5. The proposed allocation must be based on evidence that shows why the green space is of particular local significance. To meet this requirement an area must fulfil one or more of the criteria below:
 - 5.1 Beauty
 - 5.2 Historic Significance
 - 5.3 Recreational Value
 - 5.4 Tranquillity
 - 5.5 Richness of Wildlife
6. Is the site demonstrably special to the local community and of particular importance to them?
7. Could the site help to mitigate against the effects of climate change?
8. Does the site include any landscape features that could help build resilience to climate change challenges?

4. Sustainability Appraisal Strategic Environmental Assessment

4.1 The consultation document has been assessed using the SA SEA Framework Objectives. The conclusion of this assessment is shown below.

		SEA SA Framework Objectives									
		Sustainable Economy	Sustainable Society					Sustainable Environment			
		1 A Sustainable Economy	2A. Services and Facilities	2B Travel and Transport	2C Heritage and Culture	2D Safe Strong and Resilient Communities	2E Housing	2F Climate Change /Energy	3A Natural Assets and Biodiversity	3B Environmental Quality	3C Design
LGS Designation Methodology	+	+	+	+	+	+	+	+	+	+	+

Commentary

The LGS Methodology provides a systematic way of assessing sites selected or put forward for LGS designation.

LGS must...

- not have planning permission for other uses,
- not be covered by other designations e.g. Special Area of Conservation, Special Protection Areas, Local Nature Reserve
- Be within 240m radius of 10 dwellings or more
- No bigger than 10ha

The methodology ensures that sites will only be designated if they meet a set of criteria based questions. These questions work together to assess the qualities of the site such as

- Beauty
- Site visibility
- Character
- Cultural references
- Local interest
- Historic features/assets
- Historic landscape features
- Historic development of the location
- History of the site e.g. village fetes etc.
- Use as sports pitch
- Play provision
- Recreational routes
- Tranquillity
- Wildlife value
- Ecology
- Biodiversity – ancient woodlands

The methodology provides a comprehensive assessment of the criteria required to enable sites to be designated as LGS. The methodology is directly linked to the NPPF which is national guidance. The methodology also picks up on many of the issues outlined within the SA SEA Framework and will provide detail to be able to assess the sites effectively which come through the process.

During the initial assessment of the draft methodology the SA SEA reported the following: *One factor which could be added are some questions about climate change. Green spaces can help mitigate the effects of the climate change by providing opportunities for shading, cooling, food growth opportunities, ancient trees, breathing spaces in built up areas, drainage areas etc. In particular urban green spaces can help mitigate local climate change by helping to cool the climate through evapotranspiration from plants, shading effects, and rainfall interception and percolation. Other secondary benefits of urban green space may be to encourage more local recreation rather than travelling out to the countryside, thus reducing energy consumption. Whilst recognising that this in itself would not be a reason for designating a LGS, it would be good to capture this local knowledge in the initial assessment process as this could provide further evidence to support the allocation of LGS. Gathering this evidence will also recognise the Climate Change Emergency declared by the JLP Councils.*

This has now been added which will allow the Councils to assess if any proposed LGS also have secondary benefits in terms of mitigation for climate change. The designation of sites could also have

secondary benefits for employment, housing and other current uses of land by providing better local environments, but this would be assessed when the DPD reaches the site allocation stage.

5. What are the next steps of the SA SEA process?

Stage	When	SA SEA Requirements
Regulation 18 Consultation 1 Criteria for allocation and methodology	Early 2020	SA SEA of proposed site selection methodology
Evidence – update of Plymouth Open Space Assessment	Spring Summer 2020	Ongoing SA SEA as required
Regulation 18 Consultation 2 LGS allocations	Autumn 2020	Supporting SA SEA Document
LGS DPD Regulation 19 Publication	Winter 2020	Supporting SA SEA Document
Submission	Winter 2021	Supporting SA SEA