

Newcastle Development and Allocations Plan

Sustainability Appraisal Post- Adoption Statement

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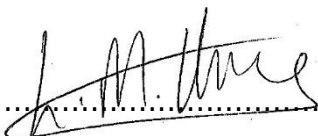
Revision History

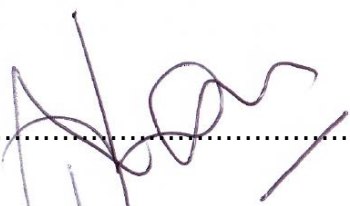
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Contract

This report describes work commissioned by Katy Deeble and Emma Warneford, on behalf of Newcastle City Council. Lucy Sumner of JBA Consulting carried out this work.

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Purpose

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Abbreviations

CSUCP	Core Strategy and Urban Core Plan
DAP	Development and Allocations Plan
NCC	Newcastle City Council
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment

1 Introduction

Newcastle City Council (NCC) has created a new Local Plan, comprising of Part 1, the Core Strategy and Urban Core Plan (CSUCP) a joint strategic plan for both NCC and Gateshead Council, and Part 2, the Development and Allocations Plan (DAP). The CSUCP was adopted on 26th March 2015 and the DAP was adopted on (DATE TBC).

In preparation of the DAP, the Council has undertaken a Sustainability Appraisal (SA) of the DAP under Section 19 of the Planning and Compulsory purchase Act 2004. This incorporated the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment (SEA) Regulations'), which implement the requirements of the European Directive 2001/42EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') (European Parliament, 2001).

The SA promotes sustainable development by identifying the likely significant economic, environmental and social effects associated with the implementation of the proposed DAP, along with measures to minimise any negative effects and maximise positive effects.

Regulation 16 of the SEA Regulations requires the responsible authority to produce an Environmental Report to accompany the adopted plan. Part 4 of Regulation 16 requires the Environmental Report to include:

- How environmental considerations have been integrated into the plan
- How the environmental report has been taken into account
- How opinions expressed in response to public consultation have been taken into account
- The reasons choosing the plan as adopted, in light of the other reasonable alternatives dealt with
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan

As such, these five points form the basis of this SA post-adoption statement.

A timeline of the SA reports produced during the development of the DAP is described below (Table 1-1).

Table 1-1: Timeline for the development of the DAP alongside the SA reports

SA reports	DAP
SA Scoping Report (JBA, 2017a) July 2017	
SA Environmental Report (JBA, 2017b) September 2017	Draft DAP and Appendices (NCC, 2017)
SA Environmental Report (JBA, 2018) September 2018	Pre-Submission DAP and Appendices (NCC, 2018)
SA Addendum (JBA, 2019) December 2019	Submission DAP and Appendices (NCC, 2020a)
	Final DAP and Appendices (NCC, 2020b)

2 Integration of environmental and sustainability considerations into the DAP

Key sustainability issues facing Newcastle were previously identified in the SA Environmental Report prepared for the CSUCP (NCC, 2015). As the DAP provides supplementary details to those policies within the CSUCP, it was deemed appropriate to use the same sustainability issues. This was also supported through the consultation process. The four key issues identified were:

- Economic Growth and Prosperity
- Health and Wellbeing
- Housing and Thriving Neighbourhoods
- Sustainable Quality Places

Table 2-1 describes the key sustainability issues affecting Newcastle and the related SEA Topics listed in Schedule 2 of the SEA Regulations.

The SA of the DAP commenced in June 2017 with the production of the SA Scoping Report (JBA, 2017a). This involved five stages and relevant sections within the SA Scoping Report are referenced below:

- Identifying and reviewing other relevant plans, programmes and environmental protection objectives (Section 3)
- Collecting baseline environmental, social and economic information – a key source was the Annual Monitoring Report produced by NCC (Section 4)
- Identifying potential sustainability problems (Section 5)
- Developing SA objectives (Section 6)
- Consulting on the scope of the SEA (Section 7)

Table 2-1: Key sustainability issues affecting Newcastle

Sustainability issues	SEA Topics
Economic Growth and Prosperity	
<ul style="list-style-type: none"> - Housing market weakness and failure - Social impacts of the economic down turn - Vitality and viability of economic centres - Worklessness - Areas of low educational achievement - Lack of higher education graduates working in Newcastle 	Population Human Health Cultural Heritage Material Assets
Health and Wellbeing	
<ul style="list-style-type: none"> - Demand on health and social services caused by an ageing population and changing demographics, particularly relating to spatial distribution of older members of the population - Life expectancy is below the national average - Poor mental health - Poor physical health (with links to obesity), the need to promote healthy active lifestyles and access to fresh local food - Unhealthy alcohol culture 	Population Human Health
Housing and Thriving Neighbourhoods	
<ul style="list-style-type: none"> - Shortage of affordable housing of an appropriate standard - Growing population needed to sustain economic growth - Crime, fear of crime and antisocial behaviour 	Population Human Health Material Assets

Sustainability issues	SEA Topics
<ul style="list-style-type: none"> - Pockets of relative deprivation - Lack of access to and quality of open spaces - Areas of lack of reasonable access to services and essential facilities - Need to continue and encourage shift to public transport, cycling and walking in order to ease traffic congestion and problems associated with severance 	Climatic Factors
Sustainable Quality Places (including Environmental Quality)	
<ul style="list-style-type: none"> - Pollution and poor air quality issues - Rising traffic volumes and associated traffic congestion - Need to actively promote biodiversity - There is a need to protect and enhance the natural environment as opposed to fragmenting networks of natural habitats - Lower levels of energy efficiency and renewable energy usage have been implemented than are required to meet greenhouse gas reduction targets - Need to limit greenhouse gas contributions to climate change - Adaptation to climate change - Amount of waste entering landfill and low levels of recycling - Balance between development on greenfield sites and development on previously developed land - Lack of accessible green space - Heritage at risk 	Population Human Health Air Water Soil Climatic Factors Biodiversity (flora and fauna) Landscape Cultural Heritage

Review of the sustainability issues led to the development of the SA framework for NCC to identify and evaluate the potential environmental and sustainability issues associated with the implementation of the Local Plan.

The full SA framework is described in Table 4-2 of the SA Environmental Report (JBA, 2018).

SA Objectives provide the framework throughout the appraisal process. The SA Objectives are outlined below:

1. Promote strong and inclusive communities
2. Ensure that that equality, diversity and integration are embedded in all future development
3. Improve educational achievement and skill levels across Newcastle
4. Improve health and well-being and reduce inequalities in health
5. Promote, enhance and respect our culture, heritage and diversity
6. Ensure good accessibility to jobs, facilities, goods and services
- 7a. Adapt to and mitigate against the impacts of climate change: Reduce our contributions to the causes of climate change
- 7b. Adapt to and mitigate against the impacts of climate change: Make sure we adapt to the effects of climate change and mitigate against its impacts in future development
8. Live within environmental limits, both locally and globally
9. Protect and enhance our environmental assets and infrastructure
10. Strengthen our economy
11. Improve access to a stable and sustainable employment market

The SA framework was developed for NCC to identify and evaluate the potential environmental and sustainability issues associated with the implementation of the Local Plan (Table 2-2).

Table 2-2: SA framework for NCC

Objective Type	SA Objective	Sustainability Criteria
Social	1. Promote strong and inclusive communities	<p>Employment:</p> <ul style="list-style-type: none"> - Increase employment - Increase number of targeted recruitment and training agreements - Increase skills <p>Retail:</p> <ul style="list-style-type: none"> - Focus retail development in centres, keeping with retail hierarchy - Improve vitality and viability <p>Leisure Culture and Tourism:</p> <ul style="list-style-type: none"> - Improve provision of facilities <p>Resident satisfaction with homes:</p> <ul style="list-style-type: none"> - Satisfaction at or above 2012 levels <p>Housing Delivery:</p> <ul style="list-style-type: none"> - Rate of delivery as set out in Policy CS12 of the CSUP <p>Wellbeing and Health:</p> <ul style="list-style-type: none"> - Improve health ranking on the Indices of Deprivation - Increase adult participation in sport - Satisfaction with Area at or above 2012 levels <p>Place Making:</p> <ul style="list-style-type: none"> - Minimise loss of, or damage to heritage assets; Minimise additions to, and increase removals from the risk register - Increase provision of public art <p>Green Infrastructure and the Natural Environment:</p> <ul style="list-style-type: none"> - Satisfaction with "Parks and green spaces" at or above 2012 levels
	2. Ensure that that equality, diversity and integration are embedded in all future development	<p>Employment:</p> <ul style="list-style-type: none"> - Increase employment - Increase number of targeted recruitment and training agreements - Increase skills Employment land and premises - Identify and allocate 150ha of employment floorspace - Provide a minimum of 512,000m2 of office floorspace <p>Retail:</p> <ul style="list-style-type: none"> - Focus retail development in centres, keeping with retail hierarchy <p>Leisure, Culture and Tourism:</p> <ul style="list-style-type: none"> - Improve provision of facilities Existing Communities

Objective Type	SA Objective	Sustainability Criteria
		<ul style="list-style-type: none"> - Reduction of total vacancy to 3% across the district - Satisfaction at or above 2012 levels Housing Delivery - Rate of delivery as set out in policy CS10 <p>Gypsy and traveller accommodation:</p> <ul style="list-style-type: none"> - Provision to meet identified need <p>Transport and Accessibility:</p> <ul style="list-style-type: none"> - Optimise accessibility of new residential development - Public Transport Patronage <p>Wellbeing and Health:</p> <ul style="list-style-type: none"> - Improve health ranking - Healthy lifestyles
	3. Improve educational achievement and skill levels across Newcastle	<p>Employment:</p> <ul style="list-style-type: none"> - Improve business survival rate - Increase number of targeted recruitment and training agreements - Increase skills
	4. Improve health and well-being and reduce inequalities in health	<p>Employment:</p> <ul style="list-style-type: none"> - Increase employment - Increase skills <p>Leisure, Culture and Tourism:</p> <ul style="list-style-type: none"> - Improve provision of facilities <p>Transport and Accessibility:</p> <ul style="list-style-type: none"> - Increase number of cycling trips - Minimise long-stay parking, maximise short-stay <p>Wellbeing and Health:</p> <ul style="list-style-type: none"> - Improve health ranking - Increase participation - Satisfaction at or above 2012 levels - Maintain or improve air quality <p>Flooding and Water:</p> <ul style="list-style-type: none"> - Minimise number of planning permissions granted contrary to Environment Agency advice - Minimise new development at risk from flooding indicated by the SFRA - Minimise and control surface water runoff according to hierarchy - No development within Flood Zone 3b (excluding exceptional circumstances) - Minimise surface water and fluvial flood risk - Minimise cumulative impacts of flood risk through a phased development approach - Require site specific Flood Risk Assessments for zones recommended in SFRA - Minimise planning permission for sites at risk from flooding indicated by the SFRA unless able to demonstrate requirements set out in SFRA <p>Green Infrastructure and the Natural Environment:</p>

Objective Type	SA Objective	Sustainability Criteria
		<ul style="list-style-type: none"> - Maintain or increase access - Open space quality
	5. Promote, enhance and respect our culture, heritage and diversity	<p>Leisure, Culture and Tourism:</p> <ul style="list-style-type: none"> - Increase number of visitors from 2010 levels <p>Gypsy and traveller accommodation:</p> <ul style="list-style-type: none"> - Provision to meet identified need <p>Place-making:</p> <ul style="list-style-type: none"> - Increase quality of completed developments, as measured through audit - Minimise loss of, or damage to heritage assets - Minimise additions to, and increase removals from the Historic England Heritage at Risk register - Increase provision of public art - Manage and enhance the historic environment
	6. Ensure good accessibility to jobs, facilities, goods and services	<p>Employment:</p> <ul style="list-style-type: none"> - Improve business survival rate - Increase number of jobs - Increase employment - Increase number of targeted recruitment and training agreements <p>Employment land and premises:</p> <ul style="list-style-type: none"> - Identify and allocate 150ha of employment floorspace - Provide a minimum of 512,000m² of office floorspace - Maintain an adequate employment and land portfolio to 2030 <p>Retail:</p> <ul style="list-style-type: none"> - Focus retail development in centres, keeping with retail hierarchy - Improve vitality and viability <p>Leisure, Culture and Tourism:</p> <ul style="list-style-type: none"> - Improve provision of facilities <p>Transport and Accessibility:</p> <ul style="list-style-type: none"> - Optimise accessibility of new residential development - Increase number of cycling trips - Minimise traffic flows - Increase number of travel plans associated with new developments - Increase levels of public transport patronage
Environmental	7a. Adapt to and mitigate against the impacts of climate change: Reduce our contributions to the causes of climate change	<p>Transport and Accessibility:</p> <ul style="list-style-type: none"> - Optimise accessibility of new residential development - Increase number of cycling trips - Minimise traffic flows - Increase number of travel plans associated with new developments - Minimise number of planning permissions for major

Objective Type	SA Objective	Sustainability Criteria
		<p>development within the Freight Management Area that do not have a Delivery Service Plan</p> <ul style="list-style-type: none"> - Increase levels of public transport patronage - Minimise long-stay parking, maximise short-stay - Maintain or improve air quality <p>Wellbeing and Health:</p> <ul style="list-style-type: none"> - Maintain or improve air quality <p>Climate Change:</p> <ul style="list-style-type: none"> - 20% CO2 reduction - Increase provision of renewable energy generating development - Increase provision of decentralised energy networks <p>Minerals and Waste:</p> <ul style="list-style-type: none"> - Minimise amount of waste sent to landfill; Monitor waste capacity to 2030 <p>Flood Risk:</p> <ul style="list-style-type: none"> - Minimise number of planning permissions granted contrary to Environment Agency advice - Minimise new development at risk from flooding indicated by the SFRA - Minimise and control surface water runoff according to hierarchy - No development within Flood Zone 3b (excluding exceptional circumstances) - Minimise surface water and fluvial flood risk - Minimise cumulative impacts of flood risk through a phased development approach - Require site specific Flood Risk Assessments for zones recommended in SFRA - Minimise planning permission for sites at risk from flooding indicated by the SFRA unless able to demonstrate requirements set out in SFRA
	<p>7b. Adapt to and mitigate against the impacts of climate change: Make sure we adapt to the effects of climate change and mitigate against its impacts in future development</p>	<p>Climate Change:</p> <ul style="list-style-type: none"> - Increase provision of renewable energy generating development - Increase provision of decentralised energy networks <p>Flooding and Water:</p> <ul style="list-style-type: none"> - Minimise number of planning permissions granted contrary to Environment Agency advice - Minimise new development at risk from flooding indicated by the SFRA - Minimise and control surface water runoff according to hierarchy - No development within Flood Zone 3b (excluding exceptional circumstances) - Minimise surface water and fluvial flood risk - Minimise cumulative impacts of flood risk through a phased development approach - Require site specific Flood Risk Assessments for zones recommended in SFRA

Objective Type	SA Objective	Sustainability Criteria
		<ul style="list-style-type: none"> - Minimise planning permission for sites at risk from flooding indicated by the SFRA unless able to demonstrate requirements set out in SFRA <p>Green Infrastructure and the Natural Environment:</p> <ul style="list-style-type: none"> - Minimising adverse impacts on areas of ecological importance. Protect and enhance Newcastle's biodiversity and geodiversity including all nationally and locally designated sites, and priority habitats. Maintain and enhance ecological connectivity to ensure that there is no net loss in extent or connectivity - Protect Newcastle's priority species - Maintain or improve water quality - Maintain or improve air and water quality in sensitive designated sites
	<p>8. Live within environmental limits, both locally and globally</p>	<p>Wellbeing and Health:</p> <ul style="list-style-type: none"> - Maintain or improve air quality <p>Place-Making:</p> <ul style="list-style-type: none"> - Increase quality of completed developments, as measured through audit - Minimise loss of, or damage to heritage assets: - Minimise additions to, and increase removals from the risk register. - Increase provision of public art <p>Climate Change:</p> <ul style="list-style-type: none"> - 20% CO2 reduction - Increase provision of renewable energy generating development - Increase provision of decentralised energy networks <p>Flooding and Water:</p> <ul style="list-style-type: none"> - Minimise number of planning permissions granted contrary to Environment Agency advice <p>Green Infrastructure and the Natural Environment:</p> <ul style="list-style-type: none"> - Maintain or improve water quality - Avoidance of the loss of best and most versatile agricultural land <p>Protecting the Green Belt:</p> <ul style="list-style-type: none"> - Minimise deletions from the Green Belt - Minimise inappropriate development within the Green Belt Minerals and Waste - 3.1m tonnes sand and gravel, 3m tonnes crushed rock for Tyne and Wear - Minimise amount of waste sent to landfill; Monitor waste capacity to 2030 - Monitor waste capacity to 2030
	<p>9. Protect and enhance our environmental assets and infrastructure</p>	<p>Green Infrastructure and the Natural Environment:</p> <ul style="list-style-type: none"> - Minimising adverse impacts on areas of ecological importance. Protect and enhance Newcastle's biodiversity and geodiversity including all nationally and locally designated sites. Maintain and enhance

Objective Type	SA Objective	Sustainability Criteria
		<p>ecological connectivity to ensure that there is no net loss in extent or connectivity.</p> <ul style="list-style-type: none"> - Maintain or increase access to allotments - Maintain or improve water quality - Satisfaction at or above 2012 levels - Avoidance of the loss of best and most versatile agricultural land <p>Protecting the Green Belt:</p> <ul style="list-style-type: none"> - Minimise deletions from the Green Belt - Minimise inappropriate development within the Green Belt
<p>Economic</p>	<p>10. Strengthen our economy</p>	<p>Population:</p> <ul style="list-style-type: none"> - Combined population with Gateshead of more than 500,000 - Maintain or increase number of residents aged 16-64 <p>Employment</p> <ul style="list-style-type: none"> - Improve business survival rate - Increase number of jobs - Increase employment - Increase number of targeted recruitment and training agreements <p>Employment land and premises:</p> <ul style="list-style-type: none"> - Identify and allocate 150ha of employment floorspace - Provide a minimum of 512,000m² of office floorspace - Maintain an adequate employment and land portfolio to 2030 <p>Retail:</p> <ul style="list-style-type: none"> - Focus retail development in centres, keeping with retail hierarchy - Improve vitality and viability - Minimise loss of primary retail frontage <p>Leisure, Culture and Tourism:</p> <ul style="list-style-type: none"> - Improve provision of facilities - Increase number of visitors from 2010 levels <p>Transport and Accessibility:</p> <ul style="list-style-type: none"> - Optimise accessibility of new residential development - Increase number of travel plans associated with new developments - Minimise number of planning permissions for major development within the Freight Management Area that do not have a Delivery Service Plan - Increase levels of public transport patronage
	<p>11. Improve access to a stable and sustainable employment market</p>	<p>Population:</p> <ul style="list-style-type: none"> - Combined population with Gateshead of more than 500,000 - Maintain or increase number of residents aged 16-64

Objective Type	SA Objective	Sustainability Criteria
		<p>Employment:</p> <ul style="list-style-type: none"> - Improve business survival rate - Increase number of jobs - Increase employment - Increase number of targeted recruitment and training agreements - Increase skills <p>Employment land and premises:</p> <ul style="list-style-type: none"> - Identify and allocate 150ha of employment floorspace - Provide a minimum of 512,000m2 of office floorspace - Maintain an adequate employment and land portfolio to 2030 <p>Transport and Accessibility:</p> <ul style="list-style-type: none"> - Optimise accessibility of new residential development

2.1 Structure of the DAP

The DAP is the second part of Newcastle upon Tyne's Local Plan. It provides the details needed to support the strategic policies and growth strategy set out in the CSUCP. The DAP includes site allocations and designations and sets out the Council's detailed policies for managing development, which will be used to assess planning applications. Together, both plans will provide strategic and detailed planning policies which will ensure that the council has policies in place to deliver our ambitions for growth for future generations

As part of the SA, both plans were appraised. Development Management policies were appraised for sustainability impacts utilising the SA framework and SA Objectives. Allocation Sites were appraised using matrices, overlay mapping and multi-criteria assessment methods of the proposed type of use (housing or economic).

The SA considered the requirements of the Habitat Regulations (made under the European Council Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC); known as 'the Habitats Directive'), and it was determined through consultation with Natural England that the HRA completed at the CSUCP stage was comprehensive and a revised screening of the Habitat Regulations was not required (NCC, 2011).

The Health and Equalities Impact Assessment followed Government guidance and the SA framework to integrate these assessments into the SA Objectives and the appraisal of the DAP (JBA, 2018).

3 Consideration of the SA reports

The SA process involved the production of SA reports throughout the development of the DAP, beginning in 2017, as summarised in Table 1-1. This was undertaken independent from the development of the Plan. However, recommendations were provided at each iteration of the appraisal to suggest how to strengthen the policies and general changes that could be made, including additional policies that would benefit the DAP.

Appraisals of the Allocation Sites and Development Management policies are described in Appendix G and H, respectively, of the SA Environmental Reports (JBA, 2017b; JBA, 2018). These two reports represent appraisals of the Draft DAP in 2017 and the Pre-Submission Draft DAP in 2018. Consideration of all of these reports can be seen in the responses section of the policy appraisal tables in Appendix H as well as Section 3 of the Compliance Statement (NCC, 2019a).

A final version of the DAP was appraised on the 11th December 2019 as a result of the modifications resulting from the independent examination of the DAP (JBA, 2019). The modifications had little impact on the conclusions drawn for the SA Environmental Report (JBA, 2018). The Main Modifications involved further clarification to the policies and their supporting text. All of the changes to the Policy Appraisal summary table have resulted in an improvement to impact significance.

Overall, the Council’s planning policy team has been open and receptive to the recommendations of the SA. In response to the SA, changes to the DAP largely relate to:

- Rewording of development plan policies
- Updating of supporting text
- Merging of policies
- Deletion of sites from SA or Strategic Flood Risk Assessment
- Updated monitoring indicators and process

Table 3-1 summarises how key recommendations of the SA have been taken into account in the adopted DAP.

Table 3-1: SA recommendations and how these have been considered in the development of the DAP

Topic	SA Recommendations	Consideration of SA recommendations in the adopted DAP
Development Management Policies	Reference CSUCP policies	Decision not to cross reference policies. Plan should be read as a whole.
Homes	Acknowledge sites are located in flood risk areas.	Site Specific Flood Risk Assessment will be required at planning application stage.
	Acknowledge sites are located in proximity of Listed Buildings.	The effect of development on the Listed Buildings will be considered at the planning application stage.
	Acknowledge the need for an assessment of the impact of loss of open space.	Open Space Assessments have been prepared for sites 13, 18, 19, 25, 37, 40 and 41 of Policy DM5 Housing Sites.
People and Place	Strengthen Policy DM19 Battlefield of Newburn Ford 1640 by including signage and interpretation discussing the history of the site.	Further details have been provided in the supporting text: "Requiring development to enhance the appearance of the Battlefield through careful design of landscaping, use of materials, and provision of public access and interpretation."

Topic	SA Recommendations	Consideration of SA recommendations in the adopted DAP
	Strengthen Policy DM20 Design with an aim to create spaces which minimise opportunities for crime.	A bullet point was added to the policy: "Ensuring that development contributes to a reduction in crime and disorder and is resilient to terrorism, delivers safe and secure buildings and spaces."
	Need for cumulative effects assessments to inform subsequent EIA for development proposals in relation to Policy DM29 Protecting and Enhancing Biodiversity and Habitats.	This policy was strengthened by wording requiring developments to provide "net gains in biodiversity".
	Merge Policy DM30 Protecting Open Space and DM31 Provision of Open Space, Sports and Recreational Buildings	Combination to create Policy DM30 Protecting and Providing for Open Space, Sport and Recreational Buildings and Land.
Infrastructure and Delivery	Strengthen Policy DM35 Telecommunications and Digital Infrastructure by requiring all developments to supply digital infrastructure.	Wording within the policy has changed from "Major Development will be encouraged to supply digital infrastructure to access electronic communications networks" to "Major Development will be required to demonstrate how it supplies digital infrastructure to access electronic communication networks within the site boundary."

The four key issues (Economic Growth and Prosperity, Health and Wellbeing, Housing and Thriving Neighbourhoods and Sustainable Quality Places) have been considered throughout the SA process through the implementation of the SA framework.

The policies were particularly positive with regards to social and economic issues. The impacts of the policies on the environmental SA Objectives were also primarily positive, with the exception of a few that had minor negative impacts (JBA, 2019). Appropriate mitigation was developed for these minor negative impacts.

4 Consideration of the opinions expressed during consultation

Throughout the development of the DAP, the associated SA reports and the versions of DAP has been subject to public consultation. Thus, providing a mechanism to ensure that stakeholder engagement requirements are achieved as interested parties/organisations and the public can inform the process and comment on decisions taken. Stakeholder engagement also ensures that environmental and social issues, constraints and opportunities are identified and assessed at an early stage of the project.

Consultation on the Scoping Report took place from the 26th May to the 6th July 2017 (JBA, 2017a). Comments were received from Natural England and Historic England. The consultees mostly suggested minor amendments to the Scoping Report and associated policies; primarily additions to the policy review or baseline data. Following feedback, the Sustainability Criteria for SA Objectives 4, 5, 7a, 7b and 9 were updated to include greater emphasis on flood risk, the historic environment, priority species, air and water quality in designated sites and the best and most versatile agricultural land. Table 4-1 describes the additional Sustainability Criteria for each of the SA Objectives described above.

Table 4-1: Additional Sustainability Criteria following consultation on the Scoping Report

SA Objective	Additional Sustainability Criteria
4. Improve health and well-being and reduce inequalities in health	<ul style="list-style-type: none"> Minimise new development at risk from flooding indicated by the SFRA Minimise and control surface water runoff according to hierarchy No development within Flood Zone 3b (excluding exceptional circumstances) Minimise surface water and fluvial flood risk Minimise cumulative impacts of flood risk through a phased development approach
5. Promote, enhance and respect our culture, heritage and diversity	<ul style="list-style-type: none"> Manage and enhance the historic environment
7. Adapt to and mitigate against the impacts of climate change: Reduce our contributions to the causes of climate change	<ul style="list-style-type: none"> No development within Flood Zone 3b (excluding exceptional circumstances) Minimise surface water and fluvial flood risk Minimise cumulative impacts of flood risk through a phased development approach Require site specific Flood Risk Assessments for zones recommended in SFRA Minimise planning permission for sites at risk from flooding indicated by the SFRA unless able to demonstrate requirements set out in SFRA
7b. Adapt to and mitigate against the impacts of climate change: Make sure we adapt to the effects of climate change and mitigate against its impacts in future development	<ul style="list-style-type: none"> No development within Flood Zone 3b (excluding exceptional circumstances) Minimise surface water and fluvial flood risk Minimise cumulative impacts of flood risk through a phased development approach Require site specific Flood Risk Assessments for zones recommended in SFRA Minimise planning permission for sites at risk from flooding indicated by the SFRA unless able to demonstrate requirements set out in SFRA Protect Newcastle's priority species.

SA Objective	Additional Sustainability Criteria
	Maintain or improve air and water quality in sensitive designated sites.
9. Protect and enhance our environmental assets and infrastructure	Avoidance of the loss of best and most versatile agricultural land

Other amendments included clarifying phrasing and referencing within the text. Amendments to the SA were made, where appropriate, to include monitoring measures which were proportionate to the plan and achievable within the existing monitoring framework.

Further consultation on the SA Environmental Report and Draft DAP took place from the 9th October to the 16th November 2017. A list of comments received from Natural England, Historic England and the Environment Agency and the associated actions taken can be found in Appendix E of the SA Environmental Report (JBA, 2018). Amendments to the DAP were made by NCC and the Pre-Submission Draft DAP was then re-appraised leading to an update of the Environmental Report. Comments returned relating to the SA were specific to the sites assessment and the comments have been incorporated into the appraisal of the individual sites. Consideration of the opinions expressed at this stage are also described in the Consultation Feedback Report and associated appendices (NCC, 2019b and c).

The Pre-Submission Draft DAP was available for public consultation between the 5th October and 16th November 2018. These opinions have been considered in the Report of Representations (NCC, 2019d), which led to the development of the Submission DAP.

The Submission DAP was subject to an independent examination, which took place between 2nd and 11th July 2019 with Inspector Joanna Gilbert. Following this, modifications were suggested divided into three documents: Main Modifications, Additional Modifications and Consequential Modifications to the Policy Map (NCC, 2019e, f and g). Public consultation on the Main Modifications, resulting from the independent examination, took place from the 16th December 2019 to the 3rd February 2020. All of these comments have been considered by the Planning Inspector and have not affected the conclusions of the SA Environmental Report and the Addendum (JBA, 2018; JBA, 2019).

5 Reasons for choosing the adopted DAP

The SA has considered reasonable alternatives in preparation of the DAP. The alternatives considered have been limited given the scope of the existing SA framework and existing CSUCP adopted in 2015. A clear audit trail has been provided throughout which can be found on the NCC website. Due to this detailed and iterative process, it is not practical to provide an exhaustive list considering the alternatives to the adopted policies. Section 3 of the Compliance Statement documents the reasoning behind the adoption of the DAP (NCC, 2019a).

The DAP supports the strategic policies and growth strategy of the CSUCP to enable the delivery of a strong Local Plan. Together the plans set out:

- The key trends and issues that have informed the Plan, which were identified through the preparation of the SA Scoping Report and a review of economic, social and environmental data;
- The national, regional and local policy context;
- NCC's vision for future development with the desired strategic outcomes, and its objectives for delivering sustainable development and addressing the key trends and issues identified;
- The strategic growth options that NCC considered in determining its preferred strategy;
- The strategic sites and alternatives that NCC considered;
- The role of the DAP in delivering the overall strategy to deliver the Core Strategy vision and objectives; and
- Key and detailed policies for implementing the strategy.

The DAP would have significant positive benefits, in the provision of new homes and employment sites as well as the retention of existing employment sites. It accords with the strategic options of the CSUCP and will provide new the housing and employment land required to sustain and grow Newcastle.

The DAP policies will potentially strengthen Newcastle retail District and Local Centres, taking into account the function of road or strategic transport hierarchy, as well as preserving and enhancing the natural and cultural built heritage within the urban core of the city. The strategic approach to flood risk management and green infrastructure management, quality housing and accessible green spaces will continue to develop positive benefits improve resident's satisfaction, health and wellbeing and long-term sustainability and development.

6 Monitoring the significant effects of implementation of the DAP

The CSUCP is a joint strategic plan for both NCC and Gateshead Council. The indicators of the SA framework for the DAP have been aligned with those for the CSUCP to maintain strong collaborative links between Gateshead and Newcastle (JBA, 2018).

This monitoring framework offers the opportunity for joint Annual monitoring reports to be completed which will help further monitor the significant impacts of the development allocation plans which sit below the CSUCP and update the framework as required.

Appendix 9 of the DAP outlines the full monitoring framework, which includes trigger points and the potential remedial actions that will be considered when reviewing policies. Of note is the indicators which monitor DAP policies that cannot be monitored through the CSUCP monitoring framework. These indicators include targets and timescales for delivery are largely considered to be throughout the plan period, rather than a specific date. Monitoring of the DAP will ensure that its implementation can contribute to addressing key issues and ensuring social, environmental and economic benefits within Newcastle.

References

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- JBA (2017b) Newcastle Local Plan: Sustainability Appraisal Environmental Report
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- NCC (2019f) Schedule of Additional Modifications
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- NCC (2020a) Development and Allocations Plan: Newcastle upon Tyne 2015-2030 Submission Plan. [online] Available at: https://www.newcastle.gov.uk/sites/default/files/planning/dap_final_submission.pdf [Accessed on 2nd March 2020]
- NCC (2020b) Development and Allocations Plan: Newcastle upon Tyne 2015-2030.

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