

St Edmundsbury Borough Council Local Development Framework

Core Strategy Development Plan Document

Sustainability Appraisal/Strategic Environmental Assessment Adoption Statement

(Statement under Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004)

St Edmundsbury Borough Council adopted the Core Strategy Development Plan Document on 14th December 2010. In accordance with Regulation 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004 the Council has produced this statement which sets out the following;

1. How the environmental considerations have been integrated into the Core Strategy;
2. How the environmental report has been taken into account;
3. How opinions expressed and results of public consultation have been taken into account;
4. The reasons for choosing the Core Strategy as adopted, in light of other reasonable alternatives dealt with; and
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the Core Strategy.

1. How environmental considerations have been integrated into the Core Strategy

- 1.1 One of the key requirements for the preparation of the Core Strategy was undertaking a Sustainability Appraisal (SA). The purpose of the Sustainability Appraisal was to promote sustainable development through the better integration of sustainability (economic, social and environmental) considerations in the preparation of the plan. This preparation of the Appraisal ensured that the requirements of EU Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004 have been fully met and incorporated into the Sustainability Appraisal.
- 1.2 The Sustainability Appraisal Report (SA Report), prepared to accompany the Core Strategy Submission Document, built on the earlier SA work undertaken by the Council for the SA Scoping Report, the initial SA of the Core Strategy Issues and Options document (March 2008) and the SA Report of the Core Strategy Preferred Options and Strategic Sites document (November 2008).
- 1.3 Following the Examination in Public, the Inspector reported on 24 August 2010 that, with the inclusion of a small number of changes to the policies, the Core Strategy Submission document would be found sound. These changes were relatively minor and do not materially alter the substance of the overall plan and its policies. For this reason it is considered that the original Sustainability Appraisal has not been undermined and is still valid. However, where there have been changes to the policies, the original sustainability assessment has been updated as necessary. This update forms Section 10 of

the final SA Report. The key stages in the preparation of the Sustainability Appraisal are summarised in Table 1 below;

Table 1 – Key SA Tasks and Outputs

Task / Output	Date	Comments
Draft SA Scoping Report	October 2006	Report considered available data and experience of council officers/LDF and took into account responses to an informal consultation, undertaken between December 2004 and January 2005 with the statutory bodies, relevant Primary Care Trusts, EERA, Suffolk Development Agency, Suffolk Wildlife Trust and other local authority services.
Consultation	October 2006	Natural England, English Nature, English Heritage, Suffolk Primary Care Trust, EERA, East of England Development Agency, Suffolk Wildlife Trust, Suffolk County Council and GO–East were consulted on the draft SA Scoping Report.
Updated SA Scoping Report	April 2007	Sustainability Appraisal Scoping Report completed.
Draft Core Strategy Issues and Options Initial Sustainability Appraisal	March 2008	The document included the compatibility assessment of the Core Strategy objectives and appraisal of five identified potential options for the distribution of growth in the borough.
Consultation	March/April 2008	A wide variety of public/stakeholder events. 30 responses made in relation to the Sustainability Appraisal.
Core Strategy Preferred Options and Strategic Sites Issues and Options Sustainability Appraisal	November 2008	The document included the appraisal of draft Core Strategy policies and Development Control Policies including options for the location of strategic growth.
Consultation	November 2008 – January 2009	A wide public consultation. 40 comments were received in relation to the Sustainability Appraisal.
Submission Core Strategy Document SA Report	July 2009	The Submission Core Strategy SA Report reviewed and updated information previously presented in the SA Scoping Report, Issues and Options Initial SA and Core Strategy Preferred Options and Strategic Sites Issues and Options SA and presents the appraisal of the final set of the Core Strategy policies.
Consultation	August 2009 – October 2009	There was an eight week consultation on the Core Strategy and SA Report. Four comments were received.

Task / Output	Date	Comments
Examination in Public and Inspector's Report	Report received 24 August 2010	The Core Strategy underwent Examination in Public. The Inspector found the Core Strategy to be Sound, subject to some minor alterations.
Final SA Report	September 2010	Following minor amendments to the Core Strategy arising from the Inspector's comments, the SA Report has been updated

2. How the environmental report has been taken into account

2.1 There were a number of stages to the development of the Sustainability Appraisal throughout the production of the Core Strategy and at each stage in the process. At each stage the emerging Core Strategy was subject to a thorough assessment against the Sustainability Objectives, which were identified through the Sustainability Environmental Assessment framework prepared by the Suffolk Sustainability Appraisal Group for all Suffolk authorities, but were locally adapted to reflect the specific characteristics of St Edmundsbury. The final SA report demonstrates how sustainability objectives have been taken into account and integrated into the final Core Strategy. The stages followed in the preparation of the Sustainability Appraisal are set out in table 1 above and are supplemented by the additional information set out below:

Stage 1 – Scoping

- Identifying other plans, programmes and sustainability objectives which inform and influence the development of the Core Strategy DPD;
- Establishing an understanding of the social, environmental and economic conditions of St Edmundsbury (the baseline);
- Identifying key sustainability issues in the borough;
- Outlining SA objectives against which to later evaluate the Core Strategy DPD policies;
- Gathering consultation feedback on the SA's proposed breadth of coverage and level of detail.

Stage 2 – Issues and Options

- An assessment was carried out on a series of spatial strategic options and reported in the initial SA of Core Strategy Issues and Options document (March 2008).

Stage 3 – Preferred Options

- An assessment was carried out on a set of draft policies and strategic sites and reported in the SA Report of the Core Strategy Preferred Options and Strategic Sites document (November 2008).

Stage 4 - Submission Stage

- Taking into account the revised policy wording resulting from the Preferred Options consultation, a further iteration of assessment of policies contained in the Core Strategy Submission document was undertaken and reported (see Section 9 of the final SA report).

Stage 5

- Following the Inspector's comments (received August 2010) and changes to policy wording a further assessment was undertaken (see Section 10 of the final SA report)

2.2 At each stage the sustainability appraisals were assessed and measures taken forward to refine and improve the sustainability of the plan. This is all recorded in the final SA report.

3. How opinions expressed and results of public consultation have been taken into account

Scoping Report

- 3.1 To meet the requirements of the Strategic Environmental Assessment Directive, local planning authorities must seek the views of the three statutory environmental consultation bodies on the scope and level of detail of the environmental information to be included SA report: English Heritage, Natural England and the Environment Agency.
- 3.2 As a result of the Directive, Suffolk Sustainability Appraisal Group (SSAG) undertook informal consultation on its SA objectives, indicators and baseline data early on in December 2004 and January 2005. Consultation was also undertaken with the statutory bodies as well as Primary Care Trusts, East of England Regional Assembly, Suffolk Development Agency, Suffolk Wildlife Trust and other local authority services. Comments received were used to assist shaping the generic SA framework for Suffolk.
- 3.3 Consultation was also undertaken on the St Edmundsbury Local Development Framework draft scoping document with the three statutory bodies, other St Edmundsbury Borough Council services as well as other statutory consultees. These comments, and any amendments which were made to the scoping report, are attached at Appendix E in the Appendices section of the final SA report.

Issues and Options Consultation

- 3.4 The initial Sustainability Appraisal was published alongside the Issues and Options Core Strategy document for consultation in March/April 2008. A number of comments were received which, along with any amendments that were made, are attached at Appendix F in the Appendices section of the final SA report.

Preferred Options and Strategic Sites Issues and Options Consultation

- 3.5 The Preferred Options Sustainability Appraisal and the initial appraisal of locations for growth were published for consultation in November 2008. The comments received and how they were dealt with is included in Appendix G of the Appendices section of the final SA report.

Submission Consultation

- 3.6 The final Sustainability Appraisal was published alongside the Submission Core Strategy in August 2009 for consultation. Comments on the final SA were received from four organisations. These were sent to the independent Planning Inspector for his consideration during the examination of the Core Strategy.

4. The reasons for choosing the Core Strategy as adopted, in light of other reasonable alternatives dealt with

- 4.1 At each stage the SA involved testing the options presented in the Core Strategy against the sustainability objectives. The results of the SA help to inform which of the options should be taken forward to the next stages of the document and formulated into policies. An outline of how the assessment was undertaken at each stage of the development of the Core Strategy is set out in section 8 of the final SA report.
- 4.2 During the early stages of the preparation of the Core Strategy a number of options were put forward in the Core Strategy Issues and Options document for the spatial growth of the borough. The SA of the Issues and Options Core Strategy identified varying degrees of sustainability across the options which are summarised in section 8 of the final SA. The conclusions were that a combination of growth in Bury St Edmunds and Haverhill (option 2) and regeneration of Haverhill growth (option 3) with some elements of option 1 (Business as usual) to ensure some growth in the larger rural settlements would be the most sustainable. The strategy of locating most growth in Bury St Edmunds and Haverhill was taken forward into the Core Strategy Preferred Options document and was subsequently followed through into the Submission Core Strategy document.
- 4.3 The Core Strategy Preferred Options and Strategic Sites Issues and Options document presented a range of options for the strategic growth around Bury St Edmunds and Haverhill. The Sustainability Appraisal of these options is summarised in section 8 of the final SA. All of the sites were found to have some sustainable and some unsustainable factors.
- 4.4 It is considered that the Core Strategy as adopted presents the most sustainable approach to the future planning of the borough. The Inspector's report, following the examination into the Submission Core Strategy states at paragraph 3.3 that 'reasonable alternatives have been considered' and that

'...there is a clear audit trail for the overall spatial strategy from the Issues and Options Document, through the Preferred Options Document to the Core Strategy with an assessment of the options included in the Sustainability Appraisal.'

5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

- 5.1 The process of Sustainability Appraisal has identified a range of sustainability effects and indicators which will require monitoring as part of the implementation of the document.
- 5.2 Appendix 7 of the final Core Strategy sets out monitoring targets and indicators through which the document will be monitored. This monitoring will be undertaken through the Annual Monitoring Report (AMR) which is the monitoring framework to be submitted to the Government at the end of each calendar year.
- 5.3 The monitoring programme set out in Appendix 7 of the Core Strategy was based on the proposed monitoring programme set out in table 12.1 of the Core Strategy Sustainability Appraisal.
- 5.4 Where it can be shown through monitoring that a policy is not delivering what was intended or key targets are not being met, then remedial action may require a review of the Core Strategy or subsequent parts of the Local Development Framework.