Forest Heath and St Edmundsbury

Joint Development Management Policies Local Plan

Strategic Environmental Assessment/Sustainability Appraisal Adoption Statement

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

St Edmundsbury Borough Council formally adopted the Joint Development Management Policies Local Plan document on 24th February 2015, and Forest Heath District Council adopted the Joint Development Management Policies Local Plan document on 27th February 2015. In accordance with Regulation 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004, the Councils have produced this statement which sets out the following;

- 1. How the environmental considerations have been integrated into the plan or programme;
- 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 plan or programme 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 plan or programme.

1. How environmental considerations have been integrated into the Joint Development Management Policies Local Plan

- 1.1 One of the key requirements for the preparation of the Joint Development Management Policies Local Plan document was undertaking a Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA). The purpose of the Sustainability Appraisal/Strategic Environmental Assessment was to promote sustainable development through the better integration of sustainability (economic, social and environmental) considerations in the preparation of the plan. The incorporation of the SEA into the SA ensures that potential significant environmental effects arising from the plan document are identified, assessed, mitigated and communicated to plan makers. This preparation of the SA/SEA 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 (table A.2 shows the sustainability themes and SEA topics).
- 1.2 The Sustainability Appraisal Report (SA Report), prepared to accompany the Joint Development Management Policies Local Plan, built on the earlier SA/SEA work undertaken by the Council for the SA Scoping Report and the initial SA of the Joint Development Management Policies Preferred Options Document (January 2012).

1.3 Following the Examination in Public, the Inspector reported on 21 January 2015 that, with the inclusion of a small number of main modifications to the policies, the Joint Development Management Policies Local Plan 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 main modifications to the policies, the original sustainability assessment has been updated as necessary. This update is a note attached to the final SA Report dated February 2015. The key stages in the preparation of the Sustainability Appraisal are summarised in Table 1 below;

Task / Output	Date	Comments
Forest Heath Draft SA Scoping Report	2005	The report considered environmental, social and economic objectives contained in other plans and programmes that are relevant to the FHDC LDF. The report assessed the broad environmental, social and economic characteristics that make Forest Heath unique and how these characteristics were changing. In light of these reviews, the report considered key problems that the LDF should address in pursuit of Sustainable Development.
St Edmundsbury 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.
Forest Heath Consultation	March 2005	The report was sent to the three statutory agencies with environmental responsibilities in England, namely English Heritage, the Environment Agency and Natural England. Other organisations with a sustainability remit or local environmental interest were also consulted including EEDA, the Highways Agency, GO-East, the East of England Tourist Board and Neighbouring Authorities. The Council

Table 1 – Key SA Tasks and Outputs

Task / Output	Date	Comments
St Edmundsbury Consultation	October 2006	considered the responses from this consultation and made amendments where appropriate in finalising the document. 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
Forest Heath - Updated SA Scoping Report	April – June 2010	Scoping Report. A further consultation was undertaken in April 2010 to take into account some changes to indicators. The report was sent to the three statutory agencies with environmental responsibilities in England, namely English Heritage, the Environment Agency and Natural England. Other organisations with a sustainability remit or local environmental interest were also consulted, including EEDA, the Highways Agency, GO-East and Neighbouring Authorities. The Council considered the responses from this consultation and made amendments where appropriate and a final version of the document was produced in June 2010.
St Edmundsbury – Updated SA Scoping Report	April 2007	Sustainability Appraisal Scoping Report completed.
Joint Development Management Policies Preferred Options Sustainability Appraisal Report	January 2012	SA report that included the appraisal of the preferred option joint development management policies
Consultation	January - March 2012	A public consultation / stakeholder consultation. 2 responses were made in relation to the Sustainability Appraisal at this consultation stage.
Joint Development Management Policies Submission draft Sustainability Appraisal	October 2012	SA Report documenting the reviewed and updated information presented in the SA Report published in January, including responses to consultation comments and appraisal of

Task / Output	Date	Comments
Report		Development Management policies modified as a result of consultation and previous SA.
Consultation	October - December 2012	A public/stakeholder consultation. There was one response in relation to the sustainability Appraisal at this consultation stage.
Joint Development Management Policies Submission draft SA Addendum (Summary Appraisal of Alternative Options) including Appendices G and H	October 2013	Appendix G identifies and describes the reasonable alternatives to the policies and was supported by Appendix H - the summary assessment matrices for each alternative which were considered against the SA objectives for each of the two authorities.
Consultation	November – December 2013	A public consultation/stakeholder consultation. 2 responses were made in relation to the SA Addendum.
Sustainability Appraisal of Main Modifications	October 2014	The document included the assessment of the main modifications, where necessary.
Examination in Public and Inspector's Report	Report received 21 January 2015	The Joint Development Management Policies Local Plan document underwent Examination in Public. The Inspector found the document to be Sound, subject to those main modifications.
Final Sustainability Appraisal Report	February 2015	Following modifications to Joint Development Management Policies Local Plan, arising from the Inspector's comments, the SA Report has been updated to reflect the final policies

2. How the environmental report has been taken into account

2.1 The preparation of the Sustainability Appraisal/Strategic Environmental Assessment has been an iterative process parallel to the various stages of the Joint Development Management Policies document and local plan process. At each stage the emerging Joint Development Management Policies document 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 Forest Heath and St Edmundsbury. The final SA report demonstrates how sustainability objectives have been taken into account and integrated into the final Joint Development Management Policies Local Plan (Annex A to the February 2015 note). 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 Joint Development Management Policies Local Plan;
- Establishing an understanding of the social, environmental and economic conditions of Forest Heath and St Edmundsbury (the baseline);
- Identifying key sustainability issues in the district and borough;
- Outlining SA objectives against which to later evaluate the policies in the Joint Development Management Policies Local Plan;
- Gathering consultation feedback on the SA's proposed breadth of coverage and level of detail.

Stage 2 – Preferred Options

• An assessment was carried out on a series of draft policies and reported in the initial SA of the Joint Development Management Policies preferred options document (January 2012).

Stage 3 - Submission Stage

• Taking into account the revised policy wording resulting from the recommendations of the Preferred Options SA/SEA and consultation, a further iteration of assessment of policies contained in the Joint Development Management Policies Submission document was undertaken and reported (see Sections 15 and 16 of the final SA report).

Stage 4

- Following the Inspector's comments (received January 2015) and changes to policy wording a further assessment was undertaken (see February 2015 note attached to the final SA report)
- 2.2 At each stage the sustainability appraisals were reviewed 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.

Preferred Options Consultation (March 2012)

3.3 Consultation on the Joint Development Management Policies Preferred Options document (January 2012) resulted in two comments being received in relation to the Sustainability Appraisal. These comments and how the comments were dealt with are attached at Appendix F to the SA.

Submission Consultation

- 3.4 The final Sustainability Appraisal was published alongside the Submission Joint Development Management Policies Local Plan for consultation. One comment on the final SA was received. This was sent to the independent Planning Inspector for his consideration during the examination of the Joint Development Management Policies Local Plan document.
- 3.5 The February 2015 note to the final SA sets out the final iteration of the policies and the modifications required, following the submission consultation and the examination by an independent planning inspector earlier in 2014.

4. The reasons for choosing the Joint Development Management Policies Local Plan document as adopted, in light of other reasonable alternatives dealt with

- 4.1 At each stage the SA involved testing the options presented in the Joint Development Management Policies document against the sustainability objectives. The results of the SA help to inform how the policies should be taken forward to the next stages of the document. An outline of how the assessment was undertaken at each stage of the development of the Joint Development Management Policies document is set out in section 2 of the October 2012 SA report.
- 4.2 The Joint Development Management Policies Preferred Options document (January 2012) presented a range of policies covering the management of development across the administrative area of both authorities. The SA of these policies is summarised in sections 13 and 14 of the October 2012 SA. All of the policies were found to have some sustainable and some unsustainable factors.
- 4.3 The Addendum to the Sustainability Appraisal and Appendices G and H of the SA (October 2013) sets out an assessment of alternatives to the policies in the Submission draft of the Joint Development Management Policies document.

4.4 It is considered that the Joint Development Management Policies Local Plan, as adopted, presents the most sustainable approach to the future planning of development in Forest Heath and St Edmundsbury. The Inspector's report, following the examination into the Submission Joint Development Management Policies Local Plan document states in the table beneath paragraph 97 that the "SA has been carried out, taking account of the proposed modifications, and is adequate."

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 A monitoring and review framework is set out in Appendix C of the final Joint Development Management Policies Local Plan document, and 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 produced by the Council each year.
- 5.3 The monitoring framework has been designed to assist the Council in assessing the performance of the local plan policies and evaluating progress in plan delivery. It is based upon clearly defined and measurable indicators. This approach will ensure that where monitoring indicates any significant threat to the environment or where development may prejudice the achievement of sustainability objectives, the Councils are able to take informed and appropriate action.

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