

FOREST HEATH DISTRICT COUNCIL

CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENT ASSESSMENT STATEMENT

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

1. INTRODUCTION

1.1. Forest Heath District Council adopted its Core Strategy Development Plan Document (DPD) on 12th May 2010. The Core Strategy DPD has been subject to sustainability appraisal¹ throughout the process of its preparation.

2. REQUIREMENT TO PUBLISH THE ENVIRONMENTAL STATEMENT AFTER THE ADOPTION OF A DPD

2.1. Councils are required to undertake strategic environmental assessment of Plans under the European Parliament Directive 2001/42/EC. This has been incorporated into the process of preparing DPDs under the Environmental Assessment of Plans and Programmes Regulations 2004, and through guidance published by the ODPM (now DCLG) in November 2005.

2.2. The guidance states that Local Planning Authorities must produce a statement to accompany the adopted DPD outlining how sustainability appraisal has been taken into account.

2.3. Article 9 of the European Directive states that when a Plan is adopted authorities must inform specific environmental consultees and the public with a statement summarising how environmental considerations have been integrated into the Plan, how the environmental report (i.e. Sustainability Appraisal Report) and the result of consultations on the report have been taken into account, and the reason for choosing the plan in the light of other reasonable alternatives. In this context, the specific environmental consultees are the Environment Agency, English Heritage, and Natural England.

2.4. The terms of Article 9 of the Directive have been transposed into the Environmental Assessment of Plans and Programmes Regulations 2004 which require that following adoption of a DPD, a statement setting out the following is published:-

- how environmental considerations have been integrated into the plan;

¹ Where this statement uses the term sustainability appraisal this means strategic environmental assessment within the meaning of the European Directive.

- how the environmental report has been taken into account;
- how opinions expressed in response to invitation to consultees to comment have been taken into account;
- set out how relevant documents have been made available for inspection;
- why the plan has been adopted rather than other reasonable alternatives;
- how the significant environmental effects of implementing the plan will be monitored.

2.5. This statement sets out the Council's responses to the above.

3. THE FINAL SUSTAINABILITY APPRAISAL REPORT

3.1. The Council's Sustainability Appraisal Report was published with the Submission Core Strategy DPD. The Hearing Sessions of the examination into the soundness of the Core Strategy DPD were held between 15th December 2009 and 15th January 2010.

3.2. Para 2.4 of the Inspector's Report dated 13th April 2010 states that the Sustainability Appraisal Report sets out the purpose, methodology and baseline information used in assessing the Council's emerging policy base including its core strategy, development control and site specific policies and allocations.

3.3. As the Inspector did not recommend any changes which would affect the Sustainability Appraisal Report published with the submitted Core Strategy, this now becomes the Final Sustainability Appraisal Report.

4. HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE PLAN

4.1 Sustainability appraisal has been carried out at every stage of the Core Strategy preparation as follows:-

- 2004 – Suffolk Sustainability Appraisal Group (SSAG), consisting of representatives from the 7 Suffolk District/Borough Councils and the County Council, identified 25 Sustainability Objectives and established a list of indicators and a monitoring framework. These were then informally consulted upon with the statutory consultees. Following this they were tailored to meet individual District/Borough requirements and then are consulted on as part of the Sustainability Appraisal Scoping Report.
- March 2005 – Initial Strategic Environmental Assessment Report and Sustainability Scoping Report published. Document prepared by Forest Heath District Council and Andrew Venn (environmental Consultant) and subject of consultation with statutory consultees,

- regional bodies, Government Office, neighbouring local authorities and internal departments prior to publication.
- July 2005 – Forest Heath Sustainability Appraisal working group set up, comprising of 5 Forest Heath officers from the Planning Policy, Environmental Services and Corporate and Community Development. A Sustainability Appraisal of the Issues and Options for the Forest Heath Local Development Framework published for public consultation along with the Local Development Framework Issues and Options document.
- August 2006 – Suffolk County Council commissioned to produce a Sustainability Appraisal report for the Core Strategy Preferred Options document. Preferred Options and Sustainability Appraisal report published for public consultation.
- July 2008 – Council prepared a Sustainability Appraisal report to accompany the Core Strategy Final Policy Option document. Both documents published for public consultation.
- March 2009 - Council prepared a Sustainability Appraisal report to accompany the Core Strategy Proposed Submission document. Both documents published.

4.2 In undertaking sustainability appraisal of the Forest Heath Core Strategy DPD the following work was undertaken.

- March 2005 – preparation of a Scoping Report setting out the context for the Sustainability Appraisal, baseline and quality of life information and key sustainability issues. Also set out the sustainability objectives that had been developed and how appraisal will be undertaken. This work was carried out for the Council by Andrew Venn (Environmental Consultant)
- July 2005 – appraisal of Core Strategy Issues and Options, publication of consultation draft. This work was carried out by Forest Heath District Council officers.
- August 2006 – appraisal of Core Strategy Preferred Options, publication of consultation draft. This work was carried out for the Council by Suffolk County Council. This stage also included the Council's Development Control policies, these were then split into a separate document at the next consultation stage.
- July 2008 – appraisal of Core Strategy Final Policy Option, publication of consultation draft. This work was carried out by Forest Heath District Council officers. This report assessed the Council's final preferred Core Strategy policies.
- March 2009 – appraisal of Core Strategy Proposed Submission document, release of document for publication stage (Regulation 27). The Proposed Submission Core Strategy include one more policy than the Final Policy Option document, therefore further sustainability appraisal was required. Also a few minor factual/updating changes were made to the Sustainability Appraisal Report, July 2008, which was then republished. This is the Sustainability Appraisal Report that was submitted with the Core Strategy

5. HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

- 5.1 The process of sustainability appraisal helped develop and refine the Core Strategy. A systematic and iterative process has been used to assess issues, objectives and options, which has enabled:
- the selection of the most sustainable options;
 - the revision of some options to make them more sustainable, and
 - the identification of the need to consider mitigation to address effects and achieve more sustainable outcomes.
- 5.2 This iterative process of sustainability appraisal started with the preparation of the Issues and Options for the Core Strategy and continued through the preparation of the subsequent revisions to the Core Strategy, including the 'Preferred Options (2006)' and the 'Final Policy Option (2008)'.
- 5.3 The Core Strategy Final Policy Option was set out in a format which included a draft policy approach, this assisted the formulation of the final policy wording in the submission Core Strategy DPD.

6. HOW THE RELEVANT DOCUMENTS HAVE BEEN MADE AVAILABLE FOR INSPECTION

- 6.1 At each stage of the preparation of the Core Strategy all consultees, those submitting representations and the public, have been made aware of the publication of new documents through direct contact, newspaper notices and for several consultations the Council newsletter. Hard copies of documents have been made available at the District Council Offices in Mildenhall, the Council Contact Points in Brandon and Newmarket and at the 4 local libraries in the District. All documents have been placed on the Council's website.

7. HOW OPINIONS EXPRESSED IN RESPONSE TO CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

- 7.1 The Regulation 30 (1) (d) and (e) statements set out how consultation responses and representations have been taken into account at each stage of the preparation of the Core Strategy:
- Appendix B of the Regulation 30 (1) (d) statement summarises the comments received and the actions taken at the Preferred Options consultation stage.
 - Appendix C of the Regulation 30 (1) (d) statement summarises the comments received and the actions taken at the Final Policy Option consultation stage.

- Section 5 of the Regulation 30 (1) (e) statement summarises the comments received on the Sustainability Appraisal at the Proposed Submission publication stage.

8. WHY THE PLAN HAS BEEN ADOPTED RATHER THAN OTHER REASONABLE ALTERNATIVES

8.1 The Sustainability Appraisal of the Issues and Options document (2005) considers the main strategic options and how they were identified. These were condensed into five reasonable options which were set out in the Core Strategy Issues and Options These were:

- Option 1 - Employment led – Encouraging a broader business base development as the top priority in the District.
- Option 2 - Housing led – Focussing on relieving pressure on housing demand by broadening the location, number and type of new dwellings in the District.
- Option 3 - Transport Infrastructure led – Facilitating transport improvements through encouraging major residential and employment developments within the District.
- Option 4 - Environment led – Constrain the scale, type, and location of development (particularly housing) in order to preserve our natural and built environment.
- Option 5 - Culture led – Facilitate a regional centre for sports and leisure activity within the District.

8.2 The Inspector's Report comments, at para 2.4, identify that the Sustainability Appraisal Report sets out the purpose, methodology and baseline information for assessing the sustainability of the Core Strategy and how the assessment of sustainability has influenced the development of the strategy. The SAR and the Issues and Options, Preferred Options and Final Policy Option documents provide an audit trail of the preparation of the strategy, and demonstrates that it is the most appropriate when considered against the alternatives. The Inspector's Report also states, at para 4.2 to 4.4, that the Council's spatial strategy and settlement hierarchy approach is supported by the Sustainability Appraisal and will result in obvious sustainability benefits. This has led to a spatial strategy based on a combination of the options identified in the Core Strategy Issues and Options, and which scores highly against sustainability objectives.

8.3 The adopted Core Strategy therefore directs development and growth principally to the most sustainable locations in the District. The strategic approach is informed and supported the results of the Sustainability Appraisals.

9. HOW THE SIGNIFICANT ENVIRONMENTAL EFFECTS OF IMPLEMENTING THE PLAN WILL BE MONITORED.

- 9.1 Article 10 of the European Directive sets out the requirement to monitor the significant environmental effects of the implementation of plans, to identify unforeseen adverse effects and to take remedial action. It acknowledges that existing monitoring arrangements may be used, if appropriate, with a view to avoid duplication of monitoring.
- 9.2 The Core Strategy includes a monitoring framework which has regard to the need to submit to Government by 31st December of each year an Annual Monitoring Report (AMR) and which should focus on the achievement of delivering sustainable development, and the other impacts and trends of policy delivery. Specifically the monitoring framework has regard to:
- whether the strategy and policies of the Core Strategy and subsequent DPDs are delivering the intended outcomes;
 - the Council's Community Strategy targets which have a 'spatial' context;
 - the Core Strategy Sustainability Appraisal indicators;
 - the monitoring requirements of the East of England Plan; and,
 - the Government's Core Output Indicators (COI's) and National Indicators (NI's).
- 9.3 The AMR therefore comprises of a 'bundle' of indicators which monitor the significant environmental, social, and economic effects of the Core Strategy. The intention is to monitor whether a policy is delivering the intended 'direction of travel' or trend towards sustainable development and the achievement of the sustainability objectives.
- 9.4 With regard to the monitoring of the sustainability appraisal objectives, the Sustainability Appraisal Scoping Report includes a wide range of baseline information and a significant number of sustainability objectives and indicators, only some of which are included in the AMR.
- 9.5 It is intended to continue to update the baseline information to provide a wider set of trend information than is in the AMR. This can be achieved by incorporating and updating this baseline information through the sustainability appraisal process for the forthcoming Site Allocations DPD and Development Policies DPD.

10. CONCLUSION

- 10.1 To be considered 'sound' a Core Strategy must be the most appropriate strategy when considered against the reasonable alternatives. Para. 1.5 of the Inspector's Report indicates that the adopted Core Strategy is the most appropriate strategy.