

**Mid Suffolk District Council
Stowmarket Area Action Plan**

Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA).

Statement of Particulars under Regulation 16(3)&(4) of the Environmental Assessment of Plans and Programmes Regulations 2004.

Mid Suffolk District Council adopted the Stowmarket Area Action Plan (SAAP) on 21st February 2013. This statement has been prepared in accordance with the above regulations, which require that a statement be produced on adoption of a plan or programme, to show:

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

This Statement examines each of these points in turn but notes that there is some overlap between certain items.

Background and Consultation History:

In accordance with the requirements of the Planning and Compulsory Purchase Act 2004 the Council, through its consultant's Atkins, undertook a sustainability appraisal (SA) for the Stowmarket Area Action Plan (SAAP). The SA process incorporated the requirements of European Directive 2001/42/EC (SEA Directive), which includes the publication of this environmental statement following the adoption of the SAAP DPD.

The sustainability appraisal is intended to assess the impact of plans and policies from an environmental, economic and social perspective and thereby tests the SAAP against the objectives of sustainable development to provide a basis for the plans improvement. The SA Report documents the appraisal process and the influence it has had on the development of options and the supporting options by reference to their significant effects and mitigation of any adverse effects.

The Main SA Report (May 2011) contains a 'non-technical summary' for the Submission SAAP April 2010 that summarises the information required by the SEA Directive. This is further supported by the Sustainability Appraisal Note of the Main Modifications (November 2012), which considers the effect of the Main Modifications proposed by the Council following the Examination of the Submission SAAP in August 2012. This statement therefore summarises and signposts the relevant parts of the sustainability appraisal.

The development of the SA over time and through consultation is documented below.

1. How environmental considerations have been integrated into the plan or Programme

The Sustainability Report sets out baseline information and identifies the main sustainability issues affecting the District, including key facts and statistics that identify the issues that the District will face in the future. The appraisal process together with the Community Strategy, the Core Strategy and the results of consultation helped to identify a number of key sustainability issues, which are summarised in Table 3-13 of the SA Report, these include:

- An ageing population
- Above Suffolk average death rate and a growing demand for healthcare services.
- Comparatively low educational achievement
- There is generally low deprivation in the district but Stowmarket has some of the most deprived areas within the District
- Lack of facilities for: young people, sport and leisure including play grounds and quality restaurants
- Supply of properties affordable to those on low incomes is inadequate and there is a shortage of smaller new-build properties.
- Supply of previously-developed land within the District is limited
- Pressure on limited water resources as a result of new development is increasing.
- Limited and poor quality signage for both vehicles and pedestrians in and around Stowmarket town centre and limited public transport services to connect across rural Mid Suffolk.
- There is a need to increase energy efficiency and resilience to climate change in the design, construction and operation of buildings, renewable energy and sustainable transport modes.
- There are sites at risk of flooding along the two river valleys.
- A rich natural and historic heritage.
- The townscape lacks attractiveness with poor utilisation of heritage grants
- Deficiencies in the retail offer results in substantial leakage from the town's catchment with implications for the local economy.

In addition to the baseline, the final SA/SEA identifies the 22 sustainability objectives that were developed jointly by the Suffolk Sustainability Action Group against which the objectives of the plan and subsequent options were assessed. The baseline information provides a basis for taking an objective view of the likely impact of policies on each SA objective with some comparative data for other areas and for trends which allows a judgment to be made of the significance of impacts.

A number of background reports and other supporting evidence including various aspects of housing, transport, the local economy, water quality, air quality, flood risk have supplemented the consideration of sustainability issues.

In addition to the SA/SEA, a Habitats Directive 'Appropriate Assessment' for plans and projects potentially affecting Natura 2000 sites (SPAs & SACs) was considered for such sites falling within a 20km radius of Stowmarket. This screening appraisal confirmed that a full Habitat Regulations Assessment was not needed. The results are recorded in the Stowmarket Area Action Plan Habitats Regulations Assessment (September 2009) and Appendix :

The SA process also includes consideration of the cumulative and synergistic effects of preferred options as well as the potential mitigation of effects and the need for monitoring to ensure their continued effectiveness.

2. How the Environmental Report has been taken into account.

[Note: Because the Environmental Report is taken into account through consultation and subsequent revision of the SAAP, there is some overlap of information between this section and section 3 below.]

The SA Report has contributed to the development of the SAAP DPD by providing an independent assessment of the sustainability of the Council's proposed options through the SAAP DPD production process. The SA Report demonstrates how the sustainability objectives have been taken into account, and integrated into the development of the SAAP DPD. This provides an audit trail and formal statement on the assessment of options, alongside the main document at each stage of the process.

The SA was prepared alongside and in support of the SAAP DPD and is a key output of the plan making process which began with the production of the SA Scoping Report. This involved identifying the sustainability issues and objectives for the SAAP DPD, as well as identifying relevant baseline information and indicators (*SA Report Appendix C*).

The comments received on the SA Scoping Report (*SA Appendix 2*) together with the Council's work with their consultants to align the Area Action Plan's strategic objectives with the objectives of Mid Suffolk's Core Strategy and Community Strategy helped to create a Sustainability Appraisal Framework (*SA Chapter 3*). This SA framework was then used to test the options, policies and allocation sites identified at the Issues and Options stage.

The application of the SA Framework to sites proposed for allocations was published as "The Land Bids Sieving Report (June 2008) [*see Chapter 5 of SA Report*] and summarised in the "Initial Sustainability Appraisal Report (September 2008). These documents were published to inform the 'SAAP Issues and Options DPDs' consultation documents for both the proposed policies (December 2008) and potential land allocations (April 2009).

As a result of these consultations the preferred options were incorporated into a Proposed Submission Area Action Plan (October 2009), which was put out to consultation together with the revised Sustainability Appraisal (October 2009).

Some mainly procedural issues were raised so that the Council withdrew the Proposed Submission (October 2009) and a 'Revised Proposed Submission SAAP (April 2010)' was produced for consultation. It was not thought necessary to revise the SA at that time due to the procedural nature of the issues raised. However following a pre-examination meeting in June 2011 it was agreed that in order ensure the soundness of the SAAP, two additional processes would be required.

- a revised sustainability report specific to the submitted SAAP of April 2010, and
- a review of the Mid Suffolk Core Strategy (to revise housing targets and the employment chapter),

[Note: The review of the Core Strategy has been a separate process subject to its own SA/SEA and consequently does not form part of this Environmental Statement.]

The revised Sustainability Appraisal Report (May 2011), which is specific to the SAAP April 2010 was published for consultation. The outcome of this appraisal process together with recommendations for further modifications is set out in *Chapter 7 and Appendices H, I & J* of the SA Report. The SA report (May 2011) was a key background evidence document for the examination of the SAAP that took place in August 2012.

Some modifications to the submitted SAAP were recommended in the SA Report and were included in the Council's list of proposed modifications to the SAAP. These included:

- Policy 6.16 the inclusion of the provision of a Primary School at Chilton Leys,
- Policy 6.21 inclusion of BAP habitats and species,
- Policy 9.2 include specific reference to native species
- Policy 9.5 require more detailed information about heritage assets in relevant planning applications

As a result of the examination and changes to national policy such as the introduction of the National Planning Policy Framework, a total of 77 Main Modifications were proposed to the Submission SAAP. These Main Modifications were subject to a separate sustainability process and both the modifications and the 'Main Modifications SA (November 2012)' were published for consultation in December 2012. Representations received during the consultation were considered by the inspector in her report and recommendations published in February 2013.

The Main SA Report (May 2011) is further supported by the Sustainability Appraisal Note of the Main Modifications (November 2012), which considers the effect of the Main Modifications proposed by the Council following the Examination of the Submission SAAP in August 2012. The outcome of these sustainability appraisals has been generally favourable across all policy areas and allocations but comment was made that the loss of agricultural land cannot be sufficiently mitigated. The absence of sufficient suitable previously developed land is a common issue in rural districts and market towns such as Stowmarket. Even with a 'brownfield first' policy in the SAAP it is not possible to meet the strategic environmental, social and economic needs of the town without developing greenfield sites and these are likely to have a history of agricultural use.

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

a). Consultation Methods:

In 2007/8 prior to commencing the formal SAAP process a Stowmarket Masterplan and Environmental Report were produced by consultants 'Core Connections'. This contained a comprehensive range of issues and was very widely consulted with residents, businesses, landowners and agents in a wide variety of venues including schools, sports clubs, parish councils and local supermarkets. The Masterplan was adopted by the Council in June 2008 and formed an advanced starting point for the Stowmarket AAP.

Formal consultation for the SAAP has been undertaken with the environmental consultation bodies, community groups and social and economic bodies for the following documents, which were published as supporting evidence to the SAAP DPD document relevant at the time:

1. SAAP Scoping Report, April and June 2008
2. SAAP Issues and Options Reports (Dec 2008 & April 2009) Initial Sustainability Appraisal Report, September 2008
3. SAAP Proposed Submission Sustainability Appraisal Report, September 2009
4. SAAP Submission (April 2010) Sustainability Appraisal Report, May 2011

In line with planning regulations and the council's Statement of Community Involvement, the following methods have been used for all of the formal consultation stages and have been supported by Council officers attending the consequential parish and other local meetings:

- Letters were sent out to all of those on the LDF Consultation Database, including statutory consultees, Parish Councils, businesses, organisations, and members of the public.
- The document was made available at established deposit points, including the Council offices, libraries, service centres and via the Council's website.
- A specific Response Form was made available both electronically and also in hard-copy
- Adverts were placed in appropriate local newspapers, notably the Bury Free Press (Stowmarket), and the East Anglian Daily Times (Ipswich).

All representations to the SAAP and the SA report that have been "duly made" at all stages of consultation have been published on the Councils consultation website. These representations have been summarised (with officer's responses) as soon as practicable into a consultation report that has been made available to the SA consultants and to the public both electronically and in text at the usual deposit points. In this way consultees can identify how their comments have been taken into account and the SA consultants can consider them at the next stage of production of the SAAP.

b). Taking comments into account:

References to the relevant parts of the SA Report where the details of how the responses to public consultation have been taken into account are shown in italics below.

The SA/SEA regulations require that the authorities referred to in Article 6 (3) shall be consulted when deciding upon the scope and level of detail of information that is to be included in the final environmental report. These authorities are referred to as the statutory consultees and include the Environment Agency, English Heritage and Natural England.

An outline SA Framework was presented in the Scoping Report in April 2008 and following consultation, the SA Framework was revised (June 2008) and the Consultation Bodies (Natural England, English Heritage, and the Environment Agency) together with Suffolk County Council were formally advised of the amendments. Further details on consultation are provided in *Appendix A2 of the SA Report*.

The SA Framework has been tested for internal compatibility and also compatibility with the Mid Suffolk Core Strategy and the Mid Suffolk Community Strategy to help identify areas where conflict may occur and whether there are opportunities to maximise benefits. The full details of the compatibility assessment are set out in *Chapter 4 of the Sustainability Appraisal (May 2011)*, with an explanation as to how this helped to identify the final SAAP Strategic Objectives and the preferred options.

The Initial SA (September 2008) with an Appendix for the assessment of sites was prepared to inform the initial consultation on the SAAP DPD Issues and Options, which was split into 2 parts, each of 6 weeks duration; 'Policies' (December 2008) and 'Sites' (April 2009). The consultation for proposed sites suggested removing from further consideration those sites that performed less well against sustainability criteria. This provided consultees with an opportunity to support each option

(with or without modifications) and to suggest alternative options in the light of the initial SA. The consultation responses to the Initial SA are set out in *Appendix A3 of the SA Report (May 2011)*.

Issues raised in the consultation were further examined in an open day - 'Planning for Stowmarket' consultation open day in Stowmarket on Saturday 6th June 2009. This event was attended by developers and infrastructure providers (many of whom made presentations) as well as members of the public and their representatives. The outcome of the consultations for the two Issues and Options SAAP, the open day and the Initial SA consultation informed the preparation of the Proposed Submission SA (September 2009) and the Proposed Submission SAAP (October 2009) that was produced in conjunction with the SA. A summary of the results of the September 2009 appraisal and the consequent recommendations are set out in *Chapter 6 and Appendices F & G of the SA Report (May 2011)*. The Proposed Submission SAAP and its SA were published for 6 weeks consultation in October and November 2009.

For reasons explained in Section 2 above the Submission SAAP (April 2010) was not originally accompanied by a revised SA. This was remedied through the SA Report (May 2011) which was subject to 6 weeks consultation. The outcomes of this appraisal process are set out in *Chapter 7 and Appendices H, I & J of the SA Report* and deal primarily with the changes to presentation and options in the SAAP between the SA Report September 2009 and the submission SAAP April 2010.

The final stage of public consultation is for the Main Modifications proposed by the Council to the examining Inspector at or following the Examination. These were subject of a separate consultation and SA Report titled *'Main Modifications SA (November 2012)* in December 2012. The SA recommendations are made at the end of each sub-section of the report. The representations received during the consultation were considered by the inspector in the production of her report and recommendations published in February 2013.

4. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;

The Environmental Assessment of Plans and Programmes Regulations 2004 (12)(2) requires SA/SEAs to consider any reasonable alternatives to the plan or programme, taking into account the objectives and scope of the document. The main alternative considered throughout has been that of 'not making the proposed changes' and the SA shows generally favourable outcomes to each successive iteration of the SAAP.

The findings of appraisal have been taken into account by the policy making team at all stages when making decisions on both the policy options and the sites to take forward. However these decisions have to be informed by strategic planning policy, strategic evidence documents and deliverability considerations as well as the sustainability appraisal. To facilitate the consideration of individual sites the approach to a number of strategic issues needed to be established as background evidence documents. These are listed in the evidence base for the examination of the SAAP and include relevant topics such as:

- Strategic Flood Risk Assessment
- Transport Assessments
- Strategic Housing Land Availability Assessment and Strategic Housing Market Assessments
- The Western Suffolk Employment Land Review
- Town Centre Retail Studies
- The Suffolk Biodiversity Action Plan
- Accessible Natural Greenspace Guidance
- Infrastructure and Viability Assessments

Information from these reports was included in the assessment process which helped inform the decisions as to which alternatives should be taken forward as allocations in the submission SAAP

In order to ensure a transparent, open-minded and even-handed approach to all the sites put forward for consideration no sites were initially excluded for reasons of existing policy. Consequently within the SA/SEA process, 81 alternative sites for the Allocations DPD were tested at the options stages against the sustainability objectives and as a result the decision was made to retain 54 sites for further consideration.

This included some sites in villages close to Stowmarket but these sites were subsequently removed because they were considered to be alternatives to sites in other villages in the district rather than to sites in the town. The application of higher level and existing strategic policies, including the preferred broad locations identified in the adopted Core Strategy (September 2008), further reduced the number of sites so that 12 sites remained in 6 favoured locations. In each of these favoured locations any adjacent sites were amalgamated to form single entities as this would enable the cumulative and synergistic effects and the necessary mitigation to be more effectively assessed and delivered. This resulted in the 6 allocations that were subsequently reported in *Chapter 7 of the Submission Sustainability Appraisal Report (May 2011)*.

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

A Monitoring Programme is set out in the Chapter 11 of the SAAP DPD and this is supplemented by *Chapter 9 and (Table 9.1)* of the SA Report (May 2011). It will involve ensuring that the sites are delivered within the indicated timescales in accordance with the policies of the Core Strategy and Policies DPD and the relevant sustainability objectives.

The SA Report proposes a number of relevant indicators for the Council to consider in relation to their sustainability objectives together with the frequency of monitoring and the body responsible. The Council has undertaken in SAAP to set out its detailed proposals in the first 'Authority's Monitoring Report' (AMR) that follows the adoption of the SAAP and this will be published on the Council's website.

Further Information

The following main documents are available from the Mid Suffolk District website:

Stow market Area Action Plan adopted February 2013

The Stowmarket Area Action Plan Main Sustainability Appraisal Report (May 2011) and Appendices

The Stowmarket Area Action Plan Main Modifications Sustainability Note (November 2012)

The Stowmarket Area Action Plan Habitats Regulations Assessment (September 2009) and Appendix

'Planning for Stowmarket' consultation open day - 6th June 2009.