



Spelthorne Local Development Framework Allocations Development Plan Document

Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) Statement of Particulars under Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004

Spelthorne Borough Council adopted its Allocations Development Plan Document (DPD) on 17 December 2009. This statement has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), 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,

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

This statement examines these points in turn.

Background

Under the Planning and Compulsory Purchase Act 2004 Spelthorne Borough Council is required to undertake a Sustainability Appraisal (SA) of all Local Development Documents which form part of the Local Development Framework. Government guidance also clarifies that SA can incorporate the requirements for a Strategic Environmental Assessment required by Article 13.3 of the European Directive 2001/42/EC (SEA Directive). The SA specifically highlights where the SEA requirements have been met.

The overall purpose of the SA is to evaluate the likely implications for sustainable development of any DPD. The policies or proposals and any reasonable alternatives are appraised to determine their potential to give rise to significant effects.

The SA Report covers the appraisal of both the Core Strategy and Policies DPD and the Allocations DPD which were submitted to the Secretary of State at the same time in June 2007. Although this statement concerns the Allocations DPD, because both documents were prepared together, it inevitably refers, as necessary, to both documents.

The final SA Report describes the culmination of a process which has included the production of a Sustainability Appraisal Scoping Report, published in March 2005, and the subsequent appraisal of the options and allocations which were the subject of consultation from September to October 2005. A further revision of the SA Report was produced in March 2006 for the consultation on the Preferred Options DPD.

SA Guidance advises that the key aim of a Development Plan Document (DPD) and the basis for appraisal should be an improvement on the situation which would exist if there were no DPD. Accordingly, the SA Report describes how the process of appraisal has identified likely impacts of a range of options and how these findings have helped in deciding which strategy to take forward, which policies and allocations to include in the DPDs, and how the emphasis of policies and choice of allocations can seek to maximise benefits and avoid adverse impacts.

Following submission of both documents in June 2007, the Allocations DPD was re-advertised in March 2008 alongside the Core Strategy and Policies DPD which had been amended to clarify the expression of the spatial strategy, particularly with regard to the approach on Green Belt. A further six week consultation took place. The Allocations DPD was not subject to any change at that time and no changes to the SA were required as a consequence of re-advertising.

Following Examination in September 2008 and subsequent adoption of the Core Strategy and Policies DPD on 26 February 2009 the Examination of the Allocations DPD took place. A Hearing was held on the 12 May 2009 and the Inspector's Report was received in on 29 June 2009. The DPD was found to be "sound" subject to a number of recommended changes.

The effect of these changes together with minor clarification updates of the text have had no significant effect on the conclusions of the SA and consequently the SA Report has not been amended.

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

The final SA Report sets out baseline information and identifies the main environmental and sustainability issues affecting the Borough. It includes key facts and statistics, and identifies the issues the Borough will face in the future. The process of appraisal, together with consideration of the Community Plan and the results of public consultation helped identify a number of sustainability issues. These were:

- Relatively low educational attainment
- Development pressure from Heathrow
- Pockets of relative deprivation
- Ageing population
- Shortage of affordable housing

- Housing densities, type and mix
- Fear of crime and anti-social behaviour
- Open space quantity and quality
- High Car use and dependency
- Traffic congestion
- Environmental constraints on development
- High pollution levels and poor air quality
- High levels of commuting both in and out
- Low levels of recycling
- Energy efficiency and renewable energy
- Promoting biodiversity and the management of wildlife sites
- High proportion of the Borough within 1:100 floodplain

In addition to the baseline information, the final SA/SEA identifies the key higher-level plans and programmes which influenced both the Core Strategy and Policies DPD and the Allocations DPD. Having regard to the sustainability issues identified, 18 sustainability objectives were developed against which the objectives of the plan and subsequently the options were assessed.

Baseline information provides a basis for taking an objective view on the likely impact of policies on each SA Objective. Since the baseline also provides comparative data for conditions in other areas and information about trends, a judgement can also be made concerning the significance of such an impact.

A number of background reports were produced following the Scoping Report stage. The reports cover air quality, transport, the Special Protection Area (SPA), flood risk, the economy, housing and flood risk and information from them supplements the consideration of sustainability issues.

In addition to the SA of the DPDs, Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans or projects affecting Natura 2000 sites (SPAs and SACs). Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, has to be subject to an “appropriate assessment” of its implications for the site in view of the site's conservation objectives.

Spelthorne Borough Council has worked with Natural England and adjoining Local Planning Authorities to assess the potential effects of the emerging DPD on a number of nearby Natura 2000 sites. It has not been possible to fully integrate the appropriate assessment process into all the stages of the SA but consideration was given to all policies which might result in development within 3km of the boundary of an SPA/SAC,

and consideration was given to the potential for significant effects on the integrity of any site. This in turn has helped inform a detailed “screening opinion” which has been recorded in a separate document (Appropriate Assessment – Draft Screening Opinion SBC April 2007). This has involved consideration of all the Natura 2000 sites within 15km of the Borough against the effects of the DPD.

The key considerations were the significance of the effects of pollution, particularly from motor vehicles, on habitats and on water quality, together with effects from increasing levels of development, urbanisation and recreational impacts. The Screening Opinion, which has been accepted by Natural England, concludes that neither the Core Strategy and Policies DPD nor the Allocations DPD would have a significant effect on any SPA or SAC.

2. How the Environmental Report has been taken into account

The SA Report has contributed to the development of the Allocations DPD by providing an independent assessment of the sustainability of the Council’s proposed options through the Allocations DPD production process. The SA Report demonstrates how the sustainability objectives have been taken into account, and integrated into the development of the Allocations 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 Allocations 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 Core Strategy and Policies DPD and Allocations DPD, as well as identifying relevant baseline information and indicators. The options which could be taken forward into the Preferred Options document were set out and the document then sent out to stakeholders for comment.

The comments received on the SA Scoping Report helped to create a final set of sustainability objectives, which were then used to test the options, policies and allocation sites identified at the Preferred Options stage. The assessment matrices for the preferred Allocations are set out in Appendix 5 of the SA Report.

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

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 England¹.

Formal consultation has been undertaken with the environmental consultation bodies, community groups and social and economic bodies for the following documents:

¹ The original Consultation Bodies included English Nature and the Countryside Commission which were subsequently reorganized to form Natural England.

- Scoping Report, March and April 2005
- Sustainability Appraisal Progress Report, September 2005
- Sustainability Appraisal Report, March 2006

An SA Framework was presented in the Scoping Report in March 2007. Following consultation, the SA Framework was revised. Consultation Bodies (Natural England, English Heritage, and the Environment Agency) together with Surrey County Council were formally advised of the amendments and asked to verify that the SA Framework was fit for its purpose. Further details on consultation are provided in Appendix 8 of the SA Report. The SA Framework has also been tested for internal compatibility to help identify areas where conflict may occur and whether there are opportunities to maximise benefits. The full details of the compatibility test are set out in Appendix 1.

Following initial consultation on DPD issues and options (SA Progress Report), the Council sought to further improve the SA Framework by re-phrasing and re-organising some of the SA Objectives. This also provided an opportunity to update objectives and indicators to reflect recent government documents, notably Securing the Future (the UK's Sustainable Development Strategy 2005, Cm 6467) and PPS1, Delivering Sustainable Development (ODPM 2005).

The Preferred Options Core Strategy and Policies DPD and the Preferred Options Allocations DPD, together with the draft SA Report, were published for public consultation in March 2006 for 6 weeks. The report highlighted the reasons for the selection of the preferred options, and assessed the options against the sustainability objectives, the uncertainties and risks of the options, as well as identifying possible mitigation measures.

As with testing the SA Objectives, addressing the transport consequences of the locational strategy is a clear priority and it was considered that smart growth, whereby land would be redeveloped for the most appropriate use or mix of uses and seek to maximise the benefits of the local circumstances, would make a positive contribution.

One DPD Objective to minimise the impact of noise on local communities and the environment was added after the initial testing. Whilst this was not identified as a significant issue through appraisal, the objective is considered to support the improvement of health and wellbeing for all.

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. Some options for delivery were not assessed within the SA/SEA process as they are limited by higher-level guidance.

Appraisal has involved a four stage process whereby the findings of appraisal have been taken into account by the policy making team when making decisions on options to take forward.

Within the SA/SEA process, 27 alternative sites for the Allocations DPD were tested at the options stages against the sustainability objectives. To facilitate the consideration of individual sites the approach to a number of strategic issues needed to be established. This involved the production of separate reports:

- Strategic Flood Risk Assessment
- Transport Statement
- Appropriate Assessment (Screening Opinion) for the South West London Waterbodies Special Protection Area (SPA)
- Detailed Air Quality Assessment for Spelthorne 26 April 2006 (CERC)

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 Allocations DPD. Some sites were not taken forward for more detailed consideration on the basis that they were located in the Green Belt. The SA considered that their greenfield nature marked them as less sustainable rather than the policy principle of only allowing development in the Green Belt in very special circumstances. Table 3 in Part IIb of the final Sustainability Appraisal Report sets out the reasons why particular sites were not taken forward as allocations.

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

A Monitoring Framework is set out at Chapter 5 (Table 1) in the Allocations DPD. 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.

In addition to the issues identified in the Core Strategy and Policies DPD the SA Report recommends that the following issues are monitored or, where data is not available, that the Council seeks to develop a means to improve monitoring:

- The condition of the SPA, in conjunction with Natural England,
- The availability of appropriately skilled workers
- Meeting BREEAM standards
- Meeting the standards in the Code for Sustainable Homes
- CO₂ emissions
- Whether areas exist with low IMD scores
- Meeting Biodiversity Action Plan targets

A number of these issues will be particularly relevant in the implementation of individual allocations. The results of this monitoring will be published annually in the Annual Monitoring Report.

Further Information

A full copy of the Sustainability Report of the Core Strategy and Policies DPD and the Allocations DPD and related documents can be downloaded from the website:

www.spelthorne.gov.uk