

# **Babergh Core Strategy Sustainability Statement**

Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations, 2004

This Sustainability Statement is prepared in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations, 2004. It effectively tells the story of the Sustainability Appraisal environmental assessment process and its relationship with the Babergh Core Strategy and is required upon adoption of the document.

**The statement is published following the adoption of the Babergh Local Plan 2011-2031 Part 1 - Core Strategy Development Plan Document on 25<sup>th</sup> February 2014.**

**The Plan and accompanying relevant documents are available to view at:**

The Babergh District Council Office, Corks Lane, Hadleigh, Suffolk, IP7 6SJ

## **Background and context**

A Sustainability Appraisal (SA) must be carried out for all Development Plan Documents (DPDs). Section 19 of the Planning & Compulsory Purchase Act, 2004 ('the 2004 Act') requires that local authorities carry out SA which also comprises the Strategic Environmental Assessment (SEA) required by European Directive 2001/42/EC and implementing regulations in England and Wales. Any further reference to SA in this statement should be assumed to incorporate SEA simultaneously. SA is an iterative process which assesses DPDs against sustainability criteria covering social, economic and environmental objectives. SA helps Local Planning Authorities (LPAs) identify the relevant predicted performance of reasonable options and policies and evaluate which are the most sustainable. The SA process has a key role in assisting the decision making process for DPD production.

The Babergh Core Strategy and Development Management Policies document has been prepared under the 2004 Act and will form the statutory development plan for Babergh District. When work commenced on the plan, the 2004 Act required it to be in general conformity with the adopted East of England Plan, the regional spatial strategy for the area. In order to localise the planning system, section 109 of the Localism Act provided for the abolition of the regional planning tier. The East of England Plan was abolished on 3<sup>rd</sup> January 2013.

In developing local plans, local planning authorities must have regard to national policies and advice contained in guidance issued by the Secretary of State for Communities and Local Government. Significantly, during the Core Strategy production process, the National Planning Policy Framework (NPPF) represented a substantial change and was published in March 2012. This sets out the Government's planning policies for England and provides a framework within which local communities can produce their own distinctive local and neighbourhood plans reflective of the needs and priorities of their communities. Local planning authorities will continue to determine the quantum and location of development, albeit without

the additional tier of regional direction. It includes Government's expectation for planning strategically across local boundaries and within that role of the planning system in protecting the environment.

In addition, local councils need to comply with existing national and European legislation in preparing their plans and the duty to co-operate, introduced in section 33A of the Act 2004 with effect from 15th November 2011, in order for their plan to be found sound at examination.

### **Core Strategy Policies**

The Core Strategy sets out the vision for Babergh to 2031. It shows how this strategy has been developed to respond to the vision for Babergh and how it will be delivered by working in partnership with everyone with an interest in the future of the district. It covers the entire district of Babergh.

The production of the Core Strategy involved 5 formal consultation stages where the public has had an input into the preferred policy approach taken. The SA process has also been iterative as the Core Strategy has evolved. Due to the nature of the district, it has also been necessary to carry out the relevant stages of a Habitats Regulations Assessment (HRA) in accordance with Regulation 61 of the Conservation of Habitats and Species Regulations 2010. The key stages of the Core Strategy, SA and HRA document production are set out in Table 01 below.

**Table 01** – key consultation stages in Core Strategy / SA / HRA production

September 2009	SA Scoping Report.
April - June 2009	“Core Strategy Issues & Options Report” & accompanying SA document.
October – November 2010	“Core Strategy The Future Growth of Babergh District to 2031” [Summer 2010] document and accompanying SA [June 2010] document.
October – December 2011	“Core Strategy (2011- 2031) Submission Draft” document & accompanying SA [September 2011] and HRA Screening [September 2011] documents.
July – August 2012	“Schedule of Proposed Main Modifications to Core Strategy (2011 - 2031) Submission Draft [July 2012] document” & accompanying SA and HRA [June 2012] addendum document.
May – July 2013	“Schedule of further Main Modifications to the Babergh Core Strategy (2011 - 2031)” [April 2013] document & accompanying SA addendum and HRA review [May 2013] document.

The Submission draft Core Strategy was consulted upon in October 2011. A number of proposed main modifications to the Submission draft Core Strategy were made thereafter, and again consulted upon in July 2012 prior to Submission in November 2012. The proposed modifications (July 2012) can be viewed on the Council website at: <http://www.babergh.gov.uk/Babergh/CoreStrategy>

The starting point for the Examination was the composite Core Strategy (incorporating all modifications up to November 2012), and all subsequent comments and modifications were taken into account by the Inspector through the Examination.

The final Inspector's Report, including Main Modifications, can be viewed on the Council's website at: <http://www.babergh.gov.uk/Babergh/CoreStrategy>

### **Purpose of the Sustainability Statement**

Babergh District Council adopted the Babergh Local Plan 2011-2031, Part 1 – Core Strategy (the 'Core Strategy') on 25th February 2014. In accordance with Article 9 of the Strategic Environmental Assessment Directive 2001, Regulation 36 of the Town and Country Planning (Local Development) (England) Regulations 2004 and Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004, the District Council has prepared this statement that sets out:

- (i) How environmental and sustainability considerations have been integrated into the Core Strategy
- (ii) How the environmental reports (sustainability appraisals) have been taken into account
- (iii) How opinions expressed during the consultation on the draft plan and environmental reports have been taken into account within the plan as adopted
- (iv) The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered
- (v) Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

The purpose of this Post Adoption Statement is to provide specific information outlined under each of the points listed above and which is presented in the following sections of this statement.

#### **(i) How environmental and sustainability considerations have been integrated into the Core Strategy**

From the outset of the Core Strategy process, the Council has sought to gather relevant baseline information regarding the social, economic and environmental characteristics of the district. This was collected for the SA Scoping Reports and the profile of information was used to inform the context for developing Objectives and Policies within the Core Strategy document. The key characteristics and issues in the district are also set out in section 1.3 of the Core Strategy and sections 4 and 5 of the SA documents. The key objective principles were established early in the process in the Issues & Options Core Strategy, (section 3) and were developed into the final 8 strategic objectives in the adopted Core Strategy (section 1.6). The Core

Strategy strategic objectives were tested against the SA objectives in order to ensure they were generally consistent with sustainable development (see section 7 of SA documents).

Each policy option was subsequently developed from the strategic objectives and the reasonable alternatives were also subject to SA analysis. The SA has been used to guide and inform the decision making process when developing the Core Strategy, and has been considered by decision makers and members of the public. Regard has been had to the NPPF, published in March 2012, which requires (para 14) that local authorities ensure that the local plan is consistent with the '*presumption in favour of sustainable development*'.

The adopted Core Strategy also includes two key policies ensuring that sustainable development is at the heart of the plan – policy CS1: Applying the Presumption in favour of Sustainable Development in Babergh, and policy CS15: Implementing Sustainable Development in Babergh. The policies have been subject to SA which confirms that they will help to ensure an overall positive environmental outcome.

## **(ii) How the environmental reports (sustainability appraisals) have been taken into account**

Table 01 above sets out the major stages of Core Strategy document production and indicates the key accompanying SA and HRA iterations. Decision makers have considered these documents during the production process as well as comments obtained from public consultation. A detailed report setting out how consultation comments have been taken into account is contained in the Council's Core Strategy Consultation Statement (September 2012).

The Council identified and considered the reasonable alternative policy options in 2009. The SA process has helped to refine the Core Strategy policies, including the main modifications prior to adoption in 2014 and has therefore improved the sustainability of the plan. The SA produced a number of recommendations and mitigation requirements throughout the process and, where relevant, these have been incorporated into the Core Strategy iterations. Other SA recommendations will be pursued when looking at more detailed development plan documents.

## **(iii) How opinions expressed during the consultation on the draft plan and environmental reports have been taken into account within the plan as adopted**

At each major stage in the production of the Core Strategy, consultation on the relevant documents (see Table 01 above) has been undertaken with the statutory and other specific consultation bodies. In addition, other organisations and community groups known to be active within the district and anyone who had previously contacted the Council requesting that they be kept informed of progress on the Local Plan were also notified. This has been carried out in accordance with the Council's Statement of Community Involvement.

The process has been iterative and all comments provided have been considered. A detailed report setting out how consultation comments have been taken into account

is contained in the Council's Core Strategy Consultation Statement (September 2012). Comments made during 2009 – 2010 were considered by the Council during the informal early plan production stages. Comments made on the Submission version documents, (2011) and thereafter, were considered by the Planning Inspector examining the Core Strategy.

**(iv) The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered**

The Council identified and consulted upon the reasonable alternatives in 2009, and subsequently, further reasonable alternatives in 2010 resulting from the proposed revocation of the East of England Plan.

As part of the iterative process, each policy / option was tested in the relevant SA report for their likely performance in relation to sustainable development. The policies were considered against the SA Framework objectives and the respective advantages and disadvantages presented. This analysis helped to guide and inform the decision making process and to select the most appropriate overall policy framework for the Babergh district.

**(v) Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.**

Most policies will require collaborative working between a wide range of bodies, including: infrastructure providers, developers, service providers, government agencies, parish and town councils. The Core Strategy contains a Delivery and Monitoring Framework. It sets out a summary of what the intended outcomes are for each policy, how they may be delivered, by whom and when. In addition it broadly identifies the indicators for success, the risks, flexibilities and contingencies, in the event that monitoring of these point to a failure to deliver.

The SA has also set out a series of monitoring recommendations in order to measure any significant social, economic and environmental effects after the Core Strategy adoption. This will allow the identification of any unforeseen adverse effects and enable appropriate remedial action to be taken.

The Annual Monitoring Report process will be used to satisfy the relevant monitoring recommendations and will normally collect and report data annually for the period between 1<sup>st</sup> April and 31<sup>st</sup> March.