

**Spelthorne Local Development Framework  
Core Strategy and Policies 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 Core Strategy and Policies Development Plan Document (DPD) on 26 February 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 the Core Strategy and Policies DPD and to consider reasonable alternatives. The plan and any alternatives have been appraised to determine their potential to give rise to significant effects.

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 to include in the DPD, and how the emphasis of policies can seek to maximise benefits and avoid adverse impacts.

Following submission, the Core Strategy and Policies DPD was amended to clarify the expression of the spatial strategy, particularly with regard to the approach on Green Belt. The DPD was re-advertised in March 2008 with a further six week consultation period. The changes did not, however, have any effect on the conclusions of the SA and consequently the SA Report did not need to be amended or re-issued.

Following Examination in September 2008 and publication of the Inspector's binding report and recommendations in December 2008 the Council has adopted the DPD. This differs from the submission plan to the extent that the "saved" policies which had been included for information have been removed. As a result Policy LO2 on flooding has been renumbered LO1. Two policies have been deleted on the recommendation of the Inspector and the subsequent policies in the chapter renumbered accordingly:

EN11 Control of Advertisements and  
EN17 Telecommunications

No other policies have been deleted from the plan but four policies were amended by the Inspector:

HO3 Affordable Housing  
TC5 Proposals for Retail Development  
EN13 Noise from Heathrow  
CC1 Renewable Energy, Energy Conservation and Sustainable Construction

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.

It should be noted that the SA Report covers the appraisal of both the Core Strategy and Policies DPD and the Allocations DPD. However the Allocations DPD is still at Examination stage and therefore the SA Report is only final with respect to the Core Strategy and Policies DPD.

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

The final SA Report of the Core Strategy and Policies DPD sets out baseline information for the Borough, 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 the Core Strategy and Policies 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 DPD, 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 the Core Strategy and Policies DPD would not 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 Core Strategy and Policies DPD by providing an independent assessment of the sustainability of the Council's proposed options and policies through the Core Strategy and Policies DPD production process. The SA Report demonstrates how the sustainability objectives have been taken into account, and integrated into the development of the Core Strategy and Policies 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 Core Strategy and Policies DPD and is a key output of the policy development process. The process began with the production of the SA Scoping Report. This involved identifying the sustainability issues and objectives for the Core Strategy and Policies 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 was 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 and policies identified at the Preferred Options stage. The sustainability objectives were then assessed against the emerging policies of the Core Strategy and Policies DPD to determine the effects of the policy. The assessment matrices are in Appendices 1 - 4 of the SA Report.

Following the assessment of the effects of the policies, measures to limit and mitigate the environmental, social and economic impacts of the Core Strategy and Policies DPD were identified. These measures are set out in chapter 4 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 England<sup>1</sup>.

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

- 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 this SAR. 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 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 a result of consultation, strategic policies in the Core Strategy and Policies DPD were modified as documented in paragraphs 4.7 to 4.41 of the SA Report.

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

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

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.

Within the SA/SEA process, the alternative options for the Core Strategy and Policies DPD were tested against the sustainability objectives. The results showed in the short, medium and long term the effects of the approach, this helped inform the decision as to which alternatives should be taken forward as policies in the Submission Core Strategy and Policies DPD. Appendix 4 of the final Sustainability Appraisal Report of the Core Strategy and Policies DPD shows these effects in full.

Judgements have been made with respect to the likely effects of policies in terms of the 18 SA Objectives. Chapter 4 (paras 4.42 – 4.74) of the SA Report presents the predicted social, environmental and economic impacts under the headings of the seven Strategic Policies.

Appraisal has not just been undertaken for the policies proposed in the submission DPD. Rather, it 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 and in drafting the strategic and detailed policies:

- Appraisal of DPD Objectives
- Appraisal of Options for delivering the DPD Objectives
- Appraisal of the seven strategic policies proposed in the Preferred Options DPD
- Consideration of how well the detailed policies support the objectives of sustainable development

The full detail of appraisal from each stage has been recorded in a set of matrices which are provided as Appendices 1, 2, 3 and 4. In forming judgements, reference has been made to the baseline information and the key issues. The focus has been on likely significant impacts of the DPD and Chapter 4 of the SA Report provides an account of the difference that the policies in this DPD are predicted to make.

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

An Implementation and Monitoring Framework is set out at Chapter 12 (Table 4) in the Core Strategy and Policies DPD. It will involve quantifying, as often as necessary, both the beneficial and adverse significant sustainability effects of implementing the plan and will seek to identify impacts which differ from those which were predicted, or were unforeseen due to changes of circumstances.

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
- CO<sub>2</sub> emissions
- Whether areas exist with low IMD scores
- Meeting Biodiversity Action Plan targets

The results of this monitoring will be published annually in the Annual Monitoring Report and will be taken forward into subsequent reviews of the Core Strategy and Policies DPD.

### **Further Information**

A full copy of the Sustainability Report of the Core Strategy and Policies DPD and related documents can be downloaded from the website: [www.spelthorne.gov.uk](http://www.spelthorne.gov.uk)