

MOLE VALLEY 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. Mole Valley District Council adopted its Core Strategy Development Plan Document (DPD) on 1st October 2009. The Core Strategy DPD has been subject to sustainability appraisal¹ throughout the process of its preparation. The Inspector's Report comments that the Sustainability Appraisal Report (SAR) shows how sustainability appraisal has influenced the development of the Core Strategy and demonstrates that the policy approaches are the most appropriate when considered against the alternatives.

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 DPD's 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 (ie 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;
- how the environmental report has been taken into account;

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

- 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. The Sustainability Appraisal Report published with the submitted Core Strategy included an explanatory note and a diagram setting out the relationship between the Core Strategy preparation stages and the Sustainability Appraisal process. It sets out the stages and process involved, and sets out much of the information for the statement.

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 19th and 27th May 2009.
- 3.2. Para 3.7 of the Inspector's Report dated 31st July 2009 states that the Sustainability Appraisal Report shows how assessment of sustainability has influenced the development of the Core Strategy and demonstrates that it is the most appropriate when considered against the alternatives.
- 3.3. The Inspector's Report also states in paras 1.3 and 1.4, that none of the changes specified, including the Council's Post Publication Minor Changes (February 2009), should materially alter the substance of the overall Plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 3.4. 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, or the need for sustainability appraisal addressed, at every stage of the Core Strategy preparation as follows:-
- May 2004 - GOSE seminar on how to build sustainability appraisal into the LDF process starts the 'ball rolling'.
 - Planning policy officers from the five east Surrey Districts² set up an informal self help LDF working group. Surrey County Council officers with sustainability appraisal experience also provide advice.
 - June 2004 - Surrey County Council run a county-wide Sustainability Appraisal workshop to brainstorm scope and methodology for sustainability

² Mole Valley DC, Epsom and Ewell BC, Elmbridge BC, Reigate and Banstead BC, and Tandridge DC

appraisal in Surrey regarding Indicators and Objectives, baseline information and plans, and policies and programmes (PPPs). Workshop attendees included the statutory environmental consultees, infrastructure providers, local amenity bodies, as well as County and district policy and sustainability officers.

- July-November 2004 - Surrey County Council, all Surrey districts, and the 4 statutory consultees [Environment Agency, English Heritage, English Nature and Countryside Commission (latter two now Natural England)] held workshops to establish sustainability objectives and indicators. It was agreed the Indicators should be based on those of the South East Integrated Regional Framework, refined to the Surrey context and having regard to the Surrey Community Strategy, DEFRA indicators, and Audit Commission Quality of Life indicators.
- Following this the five east Surrey Districts agreed a process of joint working and peer review for sustainability appraisal. It was agreed this would be overseen by an independent consultant to ensure the process is robust.

4.2 In undertaking sustainability appraisal of the Mole Valley Core Strategy DPD the following work was undertaken.

- July 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.
- November 2005 - peer review appraisal process of the Core Strategy Issues and Options.
- March 2006 - peer review appraisal of the Core Strategy Preferred Options; goals and alternative strategies.
- The outcome of this work was set out in the Sustainability Appraisal Report May 2006 which was published and consulted on alongside the Core Strategy Preferred Options.
- February 2008 - publication of a further set of Core Strategy Issues and Options. In order not to repeat previous work only the entirely new options were subject to sustainability appraisal. This was carried out by the Council but subject to independent scrutiny. (See Appendix 10 of the Sustainability Appraisal Report.)
- May 2008 - publication of Core Strategy Revised Preferred Options. This included an indication of the likely policy wording and the influence sustainability appraisal had on the chosen option. The Council considered the need for further sustainability appraisal. An exercise to compare the policy approaches in the Revised Preferred Options (May 2008) with the Preferred Options (May 2006) concluded there were no significant changes and that a new Sustainability Appraisal Report was not required. (See Appendix 11 of the Sustainability Appraisal Report.)
- November 2008 - publication of the Core Strategy : Proposed Submission Document. This did not present any new options and no further

sustainability appraisal was undertaken. A few minor factual/updating changes were made to the Sustainability Appraisal Report, May 2006, which was then republished with Appendices setting out the above work. 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 Preferred Options for the Core Strategy and continued through the preparation of the subsequent revisions to the Core Strategy, including the 'Further Issues and Options' and the 'Revised Preferred Options'.
- 5.3 The Core Strategy Revised Preferred Options was set out in a format which included a draft policy approach and a statement of the outcome of the sustainability appraisal relating to each policy option and conclusion, including positive and negative impacts. 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. Hard copies of documents have been made available at the Council Offices and Help Shop, and at local libraries in, or serving, 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 Sustainability Appraisal Report (SAR) sets out how consultation responses and representations have been taken into account at each stage of the preparation of the Core Strategy:
- Scoping Report – July 2005:- Appendix 3 of the SAR sets out the list of consultees, and Appendix 4 summarises the comments received (from 9 respondents) and the actions taken.
 - Sustainability Appraisal Report – May 2006:- Appendix 9 of the SAR summarises the comments received at this stage (3 respondents) and the actions taken.

- Further Issues and Options consultation - February 2008:- Appendix 10 of the SAR sets out the work undertaken on new options. Only one representation (from the Highways Agency) was received.
- Appendix 11 sets out the comparison of the Revised Preferred Options 2008 with the Preferred Options 2006. No responses were received with regard to this exercise.

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

8.1 Chapter 6 of the SAR considers the main strategic options and how they were identified. These were condensed into three reasonable alternatives which are set out in the Sustainability Appraisal of the Core Strategy Preferred Options (Appendix 8 of the SAR). These are:

- Alternative 1 - Concentration - make provision for new development only on previously developed land within built-up areas.
- Alternative 2 - Expansion - make provision for new development on greenfield sites on the edge of the main built-up areas.
- Alternative 3 - Dispersal of Expansion - make provision for new development on greenfield sites on the edge of larger rural settlements as well as on the edge of the main built-up areas.

8.2 Alternative 1 - Concentration was the most sustainable reasonable alternative.

8.3 The Inspector's Report comments, at para 3.7, that the SAR shows how the assessment of sustainability has influenced the development of the strategy. The SAR and the Issues and Options, Preferred Options, Further Issues and Options, and Revised Preferred Options 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 and 4.3, that in determining where development should be directed, protection of the countryside, together with Green Belt, AONB and other environmental designations, has to be balanced with providing growth of homes and jobs. This has led to a spatial strategy based primarily on the option of "concentration" identified in the Core Strategy Preferred Options, and which scores highly against sustainability objectives. However to ensure the strategy is robust and flexible the spatial strategy also includes elements of the 'expansion' and 'dispersal of expansion' options/alternatives.

8.4 The adopted Core Strategy therefore directs development and growth principally to the most sustainable locations in the District's main built-up areas; and that if there is insufficient land provision will be made by extensions to the built-up areas. The strategic approach is therefore one of 'concentration' (the most reasonable alternative). However in order to deliver the development requirements there may be a need to have regard to the other alternatives.

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 South East 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 Report, Appendix 2, 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 this 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 subsequent Land Allocations DPD and Dorking Town Centre Area Action Plan 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 3.7 of the Inspector's Report indicates that the adopted Core Strategy is the most appropriate strategy.