

**BRECKLAND DISTRICT COUNCIL
LOCAL DEVELOPMENT FRAMEWORK**

**THETFORD AREA ACTION PLAN DEVELOPMENT PLAN DOCUMENT
(LOCAL PLAN)**

**Sustainability Appraisal / Strategic Environmental Assessment
Adoption Statement
5th July 2012**

Breckland District Council adopted its Thetford Area Action Plan Development Plan Document (DPD) on 5th July 2012. 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:

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

Paragraph 165 of the National Planning Policy Framework (NPPF)¹ widens these considerations from environmental, to broader sustainability issues, so that this statement provides information on the wider sustainability appraisal process. This statement examines these points in turn.

Background

Under the Planning and Compulsory Purchase Act 2004 (as amended) Breckland Council is required to undertake a Sustainability Appraisal (SA) of all Development Plan Documents (DPD's) which form part of the Local Development Framework (LDF), and the requirement for SA is set out in the NPPF. Government guidance also clarifies that SA can incorporate the requirements for a Strategic Environmental Assessment (SEA) required by Article 13.3 of European Directive 2001/42/EC (SEA Directive). A combined SA/SEA of the Thetford Area Action Plan DPD has therefore been undertaken based on guidance provided by the Planning Advisory Service².

The overall purpose of the SA is to evaluate the likely implications for sustainable development of the Thetford Area Action Plan DPD and to consider reasonable alternatives. The plan and any reasonable alternatives have been appraised to determine their potential to give rise to significant effects.

The final SA report describes the culmination of a process that has included the production of a Sustainability Appraisal Scoping Report, published in April 2005, which has been updated periodically. The SA was carried out at Issues and Options, Preferred Options and Draft Final stages, allowing for refinement of approaches, and thereby ensuring the most appropriate option was taken forward. Extensive consultation at each stage of the process has ensured the views of the public and stakeholders have contributed to the process.

The responses received from the consultations were reported to Breckland Council's Cabinet during the production of the Thetford Area Action Plan. The Thetford Area Action Plan was then subject to a six week pre-submission publication period in August/September 2011 during which comments were invited on the soundness of the document, and whether it had been prepared in accordance with the correct procedures. A Sustainability Appraisal was published again at this time.

¹ National Planning Policy Framework, Department of Communities and Local Government, March 2012.

² <http://www.pas.gov.uk/pas/core/page.do?pagelid=152450>

The Scoping Report (prior to Issues and Options), Draft SA (at Preferred Options and Draft Final stage), Submission SA (Submission), Final SA (Examination in Public) and Adoption SA (accompanying the Adopted Thetford Area Action Plan), together constitute the 'Sustainability Appraisal Report' required by Section 19(5) of the Planning and Compulsory Purchase Act 2004. The Adoption SA should be read in conjunction with the Scoping Report (2005), the draft SAs, Submission and Final SA. These documents can be viewed on the LDF pages of the Councils website.

Following examination in March 2012 and the publication of the Inspector's Report on 30th May 2012 the Council adopted the Thetford Area Action Plan DPD on 5th July 2012. The Inspector (Mr Ian Broyd) accepted a 'Schedule of Minor Changes' proposed by the Council to provide clarification and minor updates to the text. Additionally a 4 week consultation was undertaken on a new policy referring to the NPPF which has been incorporated into the Thetford Area Action Plan as a main modification. The effect of these changes has been considered and had no significant effect on the overall conclusions of the SA.

1. How environmental considerations have been integrated into the plan

The SA of the Thetford Area Action Plan Submission DPD sets out baseline information for Thetford (in Appendix A of the Submission Sustainability Appraisal report), and identifies the main environmental and sustainability issues affecting Thetford. It includes key facts and statistics, and identifies the issues Thetford will face in the future. The baseline information was collected at a Ward and Parish scale for Thetford and data compared to district, regional and national data. The data collected helped to identify the environmental, social and economic issues that needed to be addressed. The information was collected under the following headings which are SEA/SA topics:

- Land, water and soil resources
- Climate Change, air and pollution
- Biodiversity
- Cultural Heritage and Landscape
- Population and Human Health
- Inclusive Communities/Economic Activity

The process of appraisal, together with consideration of the Sustainable Community Strategy and the results of public consultation helped identify a number of sustainability issues. These are summarised in Table 1 below:

Table 1 – Summary of SEA/SA Issues

| SEA/SA topics | Sustainability issues |
|-----------------------------------|--|
| Land, water and soil resources | <ul style="list-style-type: none"> ○ Loss of agricultural land ○ Tensions between water demand and supply. ○ Increased contamination of water and soil resources |
| Climate Change, air and pollution | <ul style="list-style-type: none"> ○ Development in certain areas may be subject to fluvial flooding and the effects of climate change ○ Reduced Air Quality ○ Increased traffic congestion and increased dependency on forms of transport that contribute to climate change ○ Energy supply issues. |
| Biodiversity (and Geodiversity) | <ul style="list-style-type: none"> ○ Effects on biodiversity and natural and semi-natural habitats as well as adverse effects on species as a result of development and the associated recreation pressure the increase in population will bring. |
| Cultural Heritage and Landscape | <ul style="list-style-type: none"> ○ Loss of historical assets and impact on historical character. ○ Pressures on landscape from new development ○ The Need for Good Quality Design |
| Population and Human | <ul style="list-style-type: none"> ○ Loss and continued shortfalls in the provision of public open space. ○ Inequalities in health. |

| SEA/SA topics | Sustainability issues |
|---|---|
| Health | <ul style="list-style-type: none"> ○ Higher crime rates in Thetford. ○ Ageing Population ○ Pressure placed on healthcare infrastructure. ○ High incidence of Limiting Long Term Illnesses. |
| Inclusive Communities/ Economic Activity | <ul style="list-style-type: none"> ○ Lack of affordable housing ○ Deprivation and low paid economy ○ Vulnerable and constrained economy ○ Higher order shopping centres outside the district attract shoppers from Thetford which results in a leakage of expenditure away from Thetford and Breckland. |

In addition to the baseline information, the versions of the SA/SEA identifies the key higher-level plans and programmes which influenced the Thetford Area Action Plan.

Having regard to the sustainability issues identified, 17 sustainability objectives were developed against which the objectives of the plan and subsequently the options were assessed (see Appendix D and E of the Adopted Sustainability Appraisal). The objectives comprehensively cover the wide range of social, economic and environmental issues of sustainability, and include the issues identified within the town.

In addition to the SA of the Thetford Area Action Plan 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 (SPA's and SAC's).

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.

Breckland District Council has worked with Natural England and RSPB to assess the potential effects of the emerging DPD on a number of Natura 2000 sites. The Thetford Area Action Plan has to be in general conformity with the adopted Core Strategy which has a number of required interventions in order to enable it to 'pass' a Habitats Regulations Assessment. Therefore, the Thetford Area Action Plan required a Habitats Regulation Assessment in order to assess Likely Significant Effect on European sites, and as such an appropriate assessment under the Habitats Regulations has been undertaken.

The key considerations were the significance of effects of land take by development, impact on protected species, recreational pressure and disturbance, water quantity and quality and changes in pollution levels. The Council objectively concluded that the submitted Thetford Area Action Plan DPD is not likely to have any significant effects on any Natura 2000 or Ramsar sites subject to mitigation measures. This was reinforced by consultation with Natural England who supported the conclusion that the Thetford Area Action Plan is unlikely to have any significant impacts on the European sites located within and in the vicinity of the Town.

2. How the Environmental Report has been taken into account

The SA Report has contributed to the development of the Thetford Area Action Plan by providing an independent assessment of the sustainability of the Council's proposed sites and policies throughout the Thetford Area Action Plan DPD production process. The SA Report demonstrates how sustainability objectives have been taken into account, and integrated into the development of the document. This provides a clear audit trail and formal statement on the assessment of options at each stage of the process.

The SA Report was prepared alongside, and in support of the Thetford Area Action Plan DPD and is a key output of the policy development process. The appraisal assisted in the assessment of various different site and policy options and in shaping the 'preferred approaches' as they were developed. These preferred options were adjusted through the appraisal process to better reflect sustainable

development objectives and ensure all aspects of sustainability were considered. The Submission Thetford Area Action Plan DPD was then prepared taking account of representations received during the three previous consultations (Issues and Options 2008, Preferred Options 2009 and Draft Final 2011) and the Submission SA Report.

The process began with preparation of the Sustainability Appraisal Scoping Report. The Scoping Report contains a series of 17 sustainability objectives, indicators and decision-making criteria and establishes a framework to appraise the Thetford Area Action Plan policy areas. A consistency matrix was used to help identify any tensions between the objectives and highlight areas where priorities needed to be determined during plan production and where mitigation measures may be required. A set of 'appraisal questions' was also formulated in order to provide more specific criteria for use in assessing sites against the objectives.

The list of 17 sustainability objectives comprehensively covers the wide range of social, economic and environmental issues of sustainability, and includes the issues identified within the Town. The sustainability objectives were used to test emerging Thetford Area Action Plan policies and land allocation options. Analysis included the scale and nature of the impact (short, medium and long term), as well as cumulative, secondary and synergistic impacts.

The analysis of the impacts of the plan proposals indicated opportunities to improve the sustainability of the plan and indicate mitigation measures. Summaries of the mitigation measures proposed are included in the Draft SAs, Submission SA, Final SA and Adopted SA. A number of changes were made to plan options, and subsequently plan policies, as a result of the analysis in the Draft SA and Submission.

Appendix I of the Adopted SA shows how the Thetford Area Action Plan DPD was changed to take on board findings.

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

Consultations throughout the SA process have been undertaken in accordance with Article 6(3) of the SEA Directive, the SEA regulations and the Breckland District Council Statement of Community Involvement. 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 are the Environment Agency, English Heritage, and Natural England. The guidance also states that it is desirable to consult other bodies with social and economic responsibilities, as the Council deems appropriate. Breckland Council therefore included Norfolk County Council and EEDA³ (as Regional Development Agency).

Consultation on the actual SA reports for various iterations of the Thetford Area Action Plan was undertaken at the same time as the consultation on that particular iteration of the document (in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 regulation 13). The statutory consultees (listed above), stakeholders and the public were consulted on the following documents:

- SA of the Thetford Area Action Plan DPD Issues and Options;
- SA of the Thetford Area Action Plan DPD Preferred Options;
- SA of the Thetford Area Action Plan DPD Draft Final; and
- SA of the Thetford Area Action Plan DPD Submission Version.

The changes that followed to the SA following the Scoping Report and Preferred Options SA are included in the SA at Appendix G.

Table 2 (over page) provides a summary of the consultations at each stage of the DPD process.

³ Although now defunct, EEDA were in existence throughout the majority of the production of the TAAP.

Table 2 - SA and Consultation Date Plan Making Stage SA Document Details

| Date | Plan Making Stage | SA Document | Details |
|--|--|---|---|
| 25 June 2008 to 5 August 2008 | Issues and Options | Scoping Report (2005) | SA at this stage provided a baseline position, objectives and a summary of a key issues and challenges facing the Town. |
| 23 February to 3 April 2009. | Preferred Options | Draft SA | SA at this stage assessed the effects of the Preferred Options and reasonable alternative options. |
| 31 January 2011 and 4 March 2011 | Draft Final | Draft SA | SA at this stage assessed the effects of the draft final options and reasonable alternative options. |
| 30th August 2011 to 11th October 2011 | Thetford Area Action Plan Pre-Submission publication | Submission SA | The final SA report including final updates to baseline and any amendments to reflect minor changes and new options made between preferred options and submission. |
| 6 th and 7 th March 2012 | Thetford Area Action Plan Thetford Area Action Plan Examination Hearings | Final SA | The final SA report including final updates to baseline and any amendments to reflect minor changes identified as a result of pre submission publication. |
| 5 th July 2012 | Adoption | The Adopted SA and this SA Adoption Statement | Also includes the final assessment to reflect changes from the main modification. Also available as a separate document is the Sustainability Appraisal of the Minor Modifications. This separate document is available at all the locations listed at section 7. |

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/SEA's to consider any reasonable alternatives to the plan or programme, taking into account the objectives and scope of the document. This statement is required to set out the reasons for choosing the plan and programme as adopted, in light of other reasonable alternatives dealt with.

This limited the number of available reasonable alternatives, as non-conformity with the clearly established strategy in a recently adopted higher order plan would make an alternative unreasonable. The Council did not consider alternatives that were in conflict with planning guidance, undermined sustainable development principles, were unrealistic in their scope, inappropriate for dealing with local conditions or priorities, or impractical to implement through the legislative scope of the LDF.

Within the SA/SEA process, the alternative options for the Thetford Area Action Plan were tested against the sustainability objectives. The results helped inform the decision as to which site and policy options should be taken forward to be identified as allocations and policies in the Submission Thetford Area Action Plan DPD. SA involves testing each reasonable site and policy against the SA Framework to determine its' performance in sustainability terms. The process is fully documented, including reasons for eliminating options. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken can be found in the in the 'Developing and Appraising Options' chapter and 'Appraisal of Policy and Site Allocations Options' of the versions of the SA.

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

The Environmental Assessment of Plans and Programmes Regulations 2004 require authorities to set out the measures that are taken to monitor the significant environmental effects of the implementation of the plan or programme.

Indicators have been developed for each sustainability objective in the Scoping Report, and many derive from Government guidance, drawing where possible from national sources of potential indicators to allow for comparisons between local data and the wider picture. Appendix A of the Adopted Sustainability Appraisal lists the selected indicators against the relevant appraisal objectives and reports the current situation and identifiable trends for each indicator, and an assessment of the Town's performance against the comparator data.

Many of the targets and indicators contained in the Scoping Report have been incorporated into the Monitoring and Implementation Framework contained in Chapter 30 of the Thetford Area Action Plan DPD. The Monitoring and Implementation Framework identifies indicators and targets to be used to assess the effectiveness of policies and highlights where change may be required if the required effect is not being achieved.

Some of the Scoping Report sustainability indicators are not included in the Monitoring Plan. They include:

- a) Indicators which will be incorporated into the monitoring of future DPD's, such as 'the number of crimes recorded' or 'the percentage of waste collected which is recycled';
- b) Indicators that relate to objectives those are not directly attributable to Thetford Area Action Plan policies, being highly influenced by other factors. Examples are 'life expectancy at birth', 'the percentage of residents with limiting long term illnesses' and 'house prices'.

These indicators will continue to be monitored as they help to show the overall level of a sustainable community. The Monitoring and Implementation Framework and SA Indicators will be monitored regularly through the Annual Monitoring Report to check whether the predicted effects are correct and if the Thetford Area Action Plan is contributing to the achievement of all SA objectives. Section 9 of the Adopted SA Report contains the latest version of the Scoping Report indicator data, as reported in the AMR 2010/11. The latest Breckland Annual Monitoring Report is available to view on the Council's website.

7. Where the SA/SEA (Environment Report) can be viewed.

In accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 Part 4, 16 (1) (a) copies of this Adoption Statement, the Thetford Area Action Plan DPD, the Policies Map, the Sustainability Appraisal (and a separate document appraising the Minor Modifications), Inspector's Report, the Sustainability Appraisal Adoption Statement as well as details of where the plan is available for inspection and the places and times at which the documents are available for public inspection, free of charge on the Council's website at www.breckland.gov.uk and also at Elizabeth House (Breckland Council Principle Office) as well as the following venues (opening times correct at time of writing):

| Parish | Location | Opening Days | Opening Times |
|---------------------|--|--|---|
| Attleborough | Attleborough Customer Service Centre Community and Enterprise Centre Church Street Attleborough Norfolk NR17 2AF | Monday, Tuesday, Thursday Friday | 0900-1630hrs 0900-1600hrs (Closed for lunch from 1300 hrs for 30mins each day) |
| | Attleborough Library 31 Connaught Road Attleborough Norfolk NR17 2BW | Monday, Wednesday, Thursday Friday Saturday | 0930-1700hrs 0930-1930hrs 0930-1600hrs |
| Dereham | Dereham Customer Service Centre (Head/Principle Office) Elizabeth House Walpole Loke Dereham | Monday-Thursday Friday | 0900-1700hrs 0900-1630hrs |

| Parish | Location | Opening Days | Opening Times |
|-----------------|--|---|---|
| | Norfolk NR19 1EE | | |
| | Dereham Customer Service Centre Breckland Business Centre St Withburga Lane Dereham Norfolk NR19 1FD | Monday-Friday | 0900-1700hrs |
| | Dereham Library 59 High Street Dereham Norfolk NR19 1DZ | Monday Wednesday, Thursday, Tuesday, Friday Saturday | 0915-1700hrs 0915-1900hrs 0915-1600hrs |
| Swaffham | Swaffham Customer Service Centre Town Hall London Street Swaffham Norfolk PE37 7DQ | Monday Tuesday, Thursday Friday | 0900-1600hrs (Closed for lunch from 1300 hrs for 30mins) 0930-1300hrs |
| | Swaffham Library The Pightle Swaffham Norfolk PE37 7DF | Tuesday, Thursday Wednesday Friday Saturday | 1000-1700hrs 1000-1300hrs 1000-2000hrs 0900-1300hrs |
| Thetford | Thetford Customer Service Centre St Nicholas Street Thetford Norfolk IP24 1BT | Monday-Thursday Friday | 0900-1700hrs 0900-1630hrs |
| | Thetford Library Raymond Street Thetford Norfolk | Monday, Tuesday, Thursday Wednesday Friday Saturday | 0830-1730hrs 0830-1300hrs 0830-1900hrs 0900-1300hrs |
| | Thetford Town Council Offices King's House King's Street Thetford IP24 2AP | Monday to Friday | Public counter service available from 0900hrs to 1600hrs |
| Watton | Watton Customer Service Centre Wayland House High Street Watton Norfolk IP25 6AR | Wednesday Friday | 0900-1630hrs 0900-1600hrs (Closed for lunch from 1300 hrs for 30mins each day) |
| | Watton Library George Trollope Road Watton Norfolk IP25 6AS | Monday, Thursday, Friday Wednesday Saturday | 1000-1700hrs 1000-1900hrs 1000-1300hrs |

8. Further Information

A full copy of the Sustainability Appraisal Report of the Thetford Area Action Plan Development Plan Document and related documents can be downloaded from the Council's website www.breckland.gov.uk.

For further information please contact the Planning Policy Team on (01362) 656873 or e-mail planningpolicyteam@breckland.gov.uk.