

11. Environmental Appraisal of the Structure Plan



View from Wickhambrook

- 11.1 The Development Plan Regulations 1999 require local authorities to have regard to environmental considerations in preparing Structure Plans. Most policies and proposals will have environmental implications, which should be appraised as part of the development plan process. Such an environmental appraisal is the process of identifying, quantifying, weighing up and reporting on the environmental and other costs and benefits of measures which are proposed.
- 11.2 Environmental appraisal is an explicit, systematic and iterative review of development plan policies and proposals to evaluate their individual and combined impacts on the environment. It is an integral part of the plan making and review process which allows for the evaluation of alternatives and is based on a quantifiable baseline of environmental quality.
- 11.3 As a first step, an appraisal of the previous Structure Plan adopted in 1995 was undertaken to identify possible impacts of policies on different aspects of the environment. This exercise highlighted policy areas where there was potentially adverse environmental impact and where further study was necessary to fully assess this impact. The appraisal was a major input into the preparation of this Plan.
- 11.4 As a second iteration of the appraisal process an impact analysis of policies in the consultation draft of this Structure Plan was undertaken. This demonstrated an improvement in the performance of the policies compared with the previous Plan.

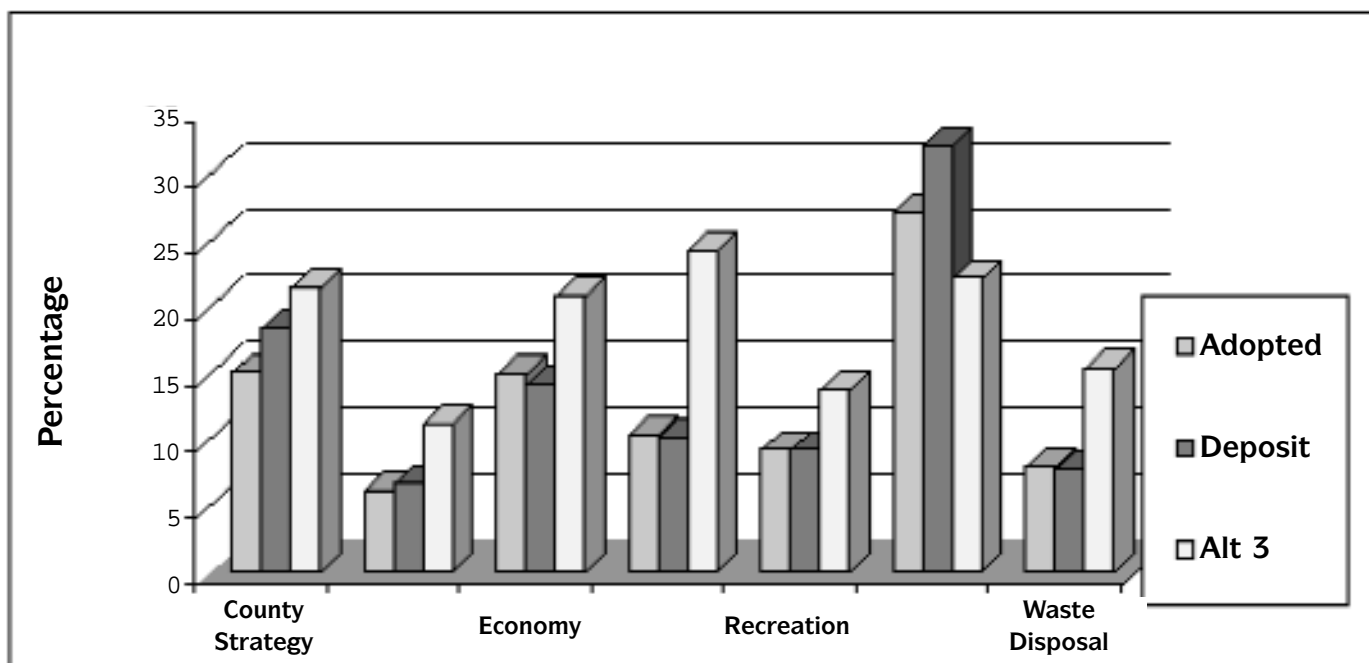
11.5 Further iterations of the appraisal have been undertaken in relation to the deposit draft of this Plan, post deposit changes, proposed modifications and this adopted version. A background document for the Examination in Public set out details of the methodology and the results of appraisal up to that point. A summary of the results of appraisal of the previous Plan and the deposit draft and adopted versions of this Plan is set out below.

SUMMARY OF RESULTS

Introduction

- 11.6 This Plan contains 95 policies capable of being appraised, compared to 88 in the deposit draft and 96 in the previous Plan. Because of this change in the number of policies, when comparing the results of the appraisals it is considered more appropriate to analyse impacts expressed as a proportion of the total impacts identified rather than stating the absolute numbers involved.
- 11.7 Appraisal has shown a progressive improvement in the performance of the Structure Plan since 1995. The proportion of overall impacts recorded as being adverse has fallen from 17.3% for the previous Plan, to 13.8% for the deposit draft and 12.5% for this Plan. The proportion of impacts that are recorded as adverse has fallen in relation to all topic policies (by section) between the previous Plan and this one, with the exception of the minerals policies. Figure 2 below summarises the results of the three appraisal exercises section by section.

Figure 2: Comparison of potential adverse impacts by section



County Strategy

- 11.8 It is inevitable that any reasonable environmental appraisal of a Structure Plan will record a significant number of adverse impacts. As the Plan makes provision for housing and employment growth and contains proposals for major transport infrastructure schemes it would be impossible to avoid adverse impacts on many aspects of the environment. The absolute number of adverse impacts identified in relation to the county strategy is little changed between all three versions of the Plan appraised. However, due to a change in the number of policies the proportion of adverse impacts recorded has decreased from the previous Plan. It should be noted that the environmental appraisal methodology is not sophisticated enough to consider the potential scale of the impacts identified.

Environment

- 11.9 Fewer adverse impacts are recorded in relation to this Plan's environment policies than in the case of the previous Plan. This is mainly due to changes in the policies regarding renewable energy development. The previous plan was restrictive towards the development of renewable energy sources and was recorded as adverse in relation to a number of stock criteria, whereas new policy ENV10 takes a more positive approach and is recorded as having fewer adverse impacts. Other new policies on biodiversity, light pollution, water conservation and energy conservation introduced into the environment section are recorded as having no adverse environmental impacts.
- 11.10 The introduction in this Plan of policy ENV5 on the avoidance of pollution has had a beneficial knock-on effect on the appraisal of those policies in other sections of the Plan which contain reference to proposals only being acceptable where consistent with policies for the protection of the environment.

Economy

- 11.11 The appraisal shows a considerable improvement in environmental performance between the previous Plan and the deposit draft of this Plan. The introduction of a new policy ECON7 promoting the development of high technology business clusters has introduced potential additional adverse impacts into this Plan. However, the performance of this Plan remains substantially better than the previous one. Despite the improvement many of the policies,

particularly those concerned with promoting the development of new or existing employment uses or tourism facilities, are recorded as having potential adverse environmental impacts. These impacts should be minimised in practice by the locational principles set out in the policies and by frequent cross references to the environment policies.

Transport

- 11.12 The number of transport policies has increased substantially in this new Plan compared to the previous one. Despite this increase, the number of adverse impacts remains virtually unchanged. As a result, the proportion of adverse impacts has fallen from 24% to 10%. This is because the majority of the new policies are concerned with the promotion of modes of travel other than the private car and are recorded as having few adverse impacts. The inclusion of fewer new road building proposals in the new Plan is not fully reflected in the appraisal, because the methodology cannot take into account beneficial reductions in the scale of impact.

Recreation, Sport and Leisure

- 11.13 Relatively little change has occurred to the recreation, sport and leisure policies between the three versions of the Structure Plan appraisal reported here. Policy REC5 of the previous Plan has been moved to the transport section of the new Plan, which has reduced the number of adverse impacts recorded by one. Because of the low number of overall impacts recorded against policies in this section, the percentage of adverse impacts recorded has fallen by 4%.

Minerals

- 11.14 The appraisal of the minerals policies shows an apparent worsening in environmental performance between the previous Plan and the deposit and final versions of this new Plan. However, this is due to the deletion of policies to reflect the adoption of the Minerals Local Plan rather than any substantive changes in the policies retained. The absolute number of adverse impacts is unaltered. Many of the development control-type policies in the previous Plan, seeking to minimise the adverse impacts of minerals extraction on the environment, have been deleted. As a result the proportion of adverse impacts has increased.

Waste Disposal

- 11.15 The environmental performance of the waste disposal policies is improved in both versions of the new Plan compared to the previous Plan. This is due to changes giving higher priority to recycling or recovery of energy from waste and seeking to minimise the amount of disposal by landfill.

Conclusion

- 11.16 In both absolute and proportional terms the number of adverse impacts fell substantially in the deposit draft version of this Plan compared to the previous Plan. A more modest improvement has been recorded between the deposit draft and this final version. Notwithstanding the limitations of the appraisal methodology, in particular its inability to take into account the scale of the impacts recorded, it is reasonable to conclude that the environmental performance of the Structure Plan has improved gradually through the three stages.

Scope of the appraisal methodology

- 11.17 PPG12 indicates that local authorities are expected to carry out a full environmental appraisal of their development plan. The above summary sets out the key features of the Suffolk Structure Plan appraisal. However, since the deposit draft of this plan was prepared, the Government has issued advice on how appraisal might be extended to encompass economic and social issues and cover all of the Government's sustainable development objectives.

- 11.18 Paragraph 4.21 of PPG12 states that the appraisal process should continue once development plans have been adopted. Key environmental and other indicators should be monitored throughout the lifetime of the Plan. These can then inform the review of the Plan and suggest the need for subsequent alterations to policies, or the replacement of the Plan. Section 12 of this Explanatory Memorandum sets out the County Council's intentions in this respect. In association with monitoring, the extension of the Council's appraisal methodology to embrace social and economic issues will be considered.