

Sustainability Appraisal of the
Borough of Redditch Local Plan No.4

Post Adoption Statement

January 2017

	Contents	Page No.
1.	Introduction	3
2.	Legislative background	4
3.	How environmental considerations have been integrated into BORLP4	5
4.	How the environmental report has been taken into account	6
5.	How the SA and Consultation Representations have been taken into account	6
6.	The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives	8
7.	The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (Regulation 16)	9
	Appendices	
	Appendix A- Key Sustainability Issues and the Sustainability Framework	10
	Appendix B- Key Stages in the BORLP4 SA process	12

1. INTRODUCTION

- 1.1 This document provides the Post-Adoption Statement for the Borough of Redditch Local Plan No.4 2011-2030 (BORLP4), which was adopted on XXX 2017 by Redditch Borough Council (RBC).
- 1.2 BORLP4 is the main basis for making decisions on planning applications within the administrative area of Redditch Borough. BORLP4 provides a general policy framework and suggests sites for development to meet the housing and employment needs of the Borough.
- 1.3 A Sustainability Appraisal (SA) was undertaken whilst developing BORLP4. The purpose of the SA was to ensure that the environmental, social and economic issues were considered throughout the development of BORLP4 with the aim of improving sustainability through its implementation.
- 1.4 The purpose of the Post-Adoption Statement is to satisfy the legislative requirements of Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations (2004).
- 1.5 In total RBC has previously produced 24 key SA documents in the process of developing the Local Plan as follows:

	Document	Date
1	Sustainability Appraisal Scoping Report	October 2007
2	Draft Sustainability Appraisal for the Core Strategy Issues and Options Document	May – June 2008
3	Sustainability Appraisal Scoping Report Annual Update	May 2008
4	Sustainability Appraisal Scoping Report Annual Update	October 2008
5	Sustainability Appraisal for the Preferred Draft Core Strategy	Oct 2008 - Jan 2009
6	Sustainability Appraisal Scoping Report Annual Update	April 2009
7	Sustainability Appraisal Refresh and Technical Paper	March 2009
8	Sustainability Appraisal Refresh	Feb - March 2010
9	Sustainability Appraisal Scoping Report Annual Update	April 2010
10	Sustainability Appraisal Scoping Report Annual Update	April 2011
11	Sustainability Appraisal for the Revised Preferred Draft Core Strategy	Jan - March 2011
12	Sustainability Appraisal Scoping Report Annual Update	April 2012
13	Sustainability Appraisal for the Bromsgrove District and Redditch Borough Housing Growth Development Study	January 2013
14	Sustainability Appraisal for the Draft Borough of Redditch Local Plan No.4	January 2013
15	BORLP4 Proposed Submission Sustainability Appraisal	September 2013
16	Sustainability Appraisal Addendum Post Proposed Submission Corrections	March 2014
17	Sustainability Appraisal Scoping Report Annual Update	March 2014
18	BORLP4 Sustainability Appraisal Refresh	November 2014
19	Addendum to the Housing Growth Development Study and the Housing Growth Sustainability Appraisal	November 2014
20	Bromsgrove District Council & Redditch Borough Council Joint Note to clarify the recent SA process in line with a request from the Inspector	May 2015
21	BORLP4 Sustainability Appraisal - Revised Submission for Consultation	March 2015
22	Summary of changes made to the Borough of Redditch Local Plan No.4	March 2015

	Sustainability Appraisal - Revised Submission for Consultation (March 2015) in response to the six week consultation process (Examination Document Number OED/33b)	
23	BORLP4 Sustainability Appraisal	May 2015
24	BORLP4 – Proposed Main Modifications Screening Matrix 2016	December 2016

- 1.6 RBC took the findings and recommendations of the SA at each stage into account in preparing the BORLP4 before its Adoption.
- 1.7 Most of the SA work was carried out by the Development Plan Planning Team at Redditch Borough Council.
- 1.8 SA screening of the Inspector’s proposed Main Modifications was carried out but the Council did not consider that the modifications proposed by the Inspector (nor minor ones proposed by the Council) would lead to significant changes and therefore did not require further consultation or SA work.

2. Legislative background

- 2.1 European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (‘the SEA Directive’) states that a Strategic Environmental Assessment is mandatory for plans prepared for town and country planning and land use purposes.
- 2.2 The SEA Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the Sustainability Appraisal of local development plan documents.
- 2.3 The Town and Country Planning (Local Planning) Regulations (2012) states that a Sustainability Appraisal report must be completed for Local Plan documents in accordance with section 19(5) of the Planning and Compulsory Purchase Act (2004).
- 2.4 In accordance with these regulations, a Sustainability Appraisal was prepared completed for the Local Plan under the following requirements:
- Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004 implementing the European SEA Directive.
 - Paragraph 165 of the National Planning Policy Framework (NPPF, 2012).
- 2.5 Article 9 of the SEA Directive requires that when a plan or programme is adopted, the Council makes available a statement summarising:
- “how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.”*

2.6 This requirement in European law has been transposed into UK law through Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the responsible authority to produce a statement containing the following information as soon as reasonably practical after the adoption of a plan or programme:

- 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 in response to:
 - i. The invitation referred to in Regulation 13(2)(d);
 - ii. Action taken by the responsible authority in accordance with Regulation 13(4), have been taken into account;
- 4) How the results of any consultations entered into under Regulation 14(4) have been taken into account;
- 5) The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- 6) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (Regulation 16).

3. How environmental considerations have been integrated into BORLP4

3.1 The Sustainability Appraisal process involves assessing the performance of a plan or a programme against a series of sustainability objectives to test whether it is likely to result in significant environmental effects. These sustainability objectives and associated questions guide the evaluation of proposed policies and sites through a sustainability framework.

3.2 The sustainability framework for the Plan was developed during the scoping stage for the Sustainability Appraisal by considering the following:

- The environmental objectives of other plans, policies, programmes and objectives on a local, national and international scale;
- the characteristics of Redditch Borough and
- the key environmental problems within Redditch Borough.

3.3 This ensured that both the wider environmental considerations and the specific environmental problems in Redditch Borough were integrated into the sustainability framework and therefore the Local Plan, since each policy and allocation was tested using the sustainability framework.

3.4 The key sustainability issues and how they are reflected in the sustainability objectives is set out in Appendix A below.

3.5 The sustainability framework for the Borough Plan considers each of the environmental topics set out in Annex 1 of the SEA Directive and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations (2004), as shown in Table 2.1 Page 9

of the Borough of Redditch Local Plan No.4 Sustainability Appraisal (May 2015). The full range of environmental considerations were therefore integrated into BORLP4.

3.6 The Environment Agency, Natural England and Historic England (formerly known as English Heritage) were consulted as statutory consultees during the development of the sustainability framework and during the SA Scoping stages. This ensured that the sustainability framework addressed the key environmental considerations of other organisations.

4. How the environmental report has been taken into account

4.1 The SA must be an integral part of producing the Plan being appraised. The section below describes the process by which the SA influenced the development of BORLP4.

4.2 The SA identified relevant sustainability objectives for the Borough and provided an objective assessment of the likely significant effects of the policies and site allocations throughout the preparation of BORLP4.

4.3 At each stage the SA recommends a series of mitigation measures to reduce or avoid the potential adverse effects and maximise the potential beneficial effects arising from the implementation of the Plan and these changes have been incorporated into the adopted Local Plan.

4.4 The SA has informed the selection of preferred options through an objective appraisal of a range of reasonable options and alternatives against the framework of sustainability objectives for the Borough. The types of options considered fall into the following categories:

- Alternatives to the development strategy
- Alternative locations for development
- 'Do nothing' option

4.5 Appendix B provides details the key stages of SA consultation during the preparation of the Plan.

5. How the SA and Consultation Representations have been taken into account.

5.1 The SEA Directive requires the opinions expressed by consultees to be taken into account during the preparation of the plan before its adoption. Consultation is therefore an important aspect of plan making and SA and this is set out in Appendix B.

5.2 Appendix B demonstrates that there was consultation of every key stage of the Plan's preparation and that this included consultation on the associated SA documents. Sustainability Appraisal has accompanied each stage of the plan-making process and been subject to consultation. The outcomes of these consultations have been reported in Consultation Statements (Regulation 19) and Regulation 22(1) Summary of Main Issues Raised at Proposed Submission Stage. A very small number of representations were received on the SA at each stage which included observations on the scores given

and the scope of the SA (in relations to Habitats Regulations Assessment). Where appropriate, these comments have informed subsequent versions of the SA.

- 5.3 In addition, the SA Scoping Report was informed by information gathering beginning in June 2007. Statutory consultation was carried out in November 2007 with the three statutory bodies (Historic England, Environment Agency and Natural England) and other stakeholders. A total of seven responses were received on all aspects of the Scoping Report and appropriate amendments were made to the contents of the report (information taken from Borough of Redditch Local Plan No.4 Sustainability Appraisal May 2015). All representations on the SA were collated and summarised at each stage of plan preparation and Officer Responses were made addressing the comments of consultees. This ensured that the SA and consultation responses were considered in an iterative and ongoing way throughout the plan making process.
- 5.4 Regulation 22 (1) (c) (v) of the Town and Country Planning (Local Development) (England) Regulations 2012 sets out that a summary of the main issues raised to the Local Plan should be completed. This was completed at every stage of the Plan making process. It was not appropriate to complete this after the Publication stage of the process as the Plan had already been submitted and this was the version the Inspector would be basing the Examination in Public on. At this point all representation received were sent directly to the Inspector for assessment.
- 5.5 A document was produced entitled 'Summary of changes made to the Borough of Redditch Local Plan No.4 Sustainability Appraisal - Revised Submission for Consultation (March 2015) in response to the six week consultation process' (Examination Document Number OED/33b) which details the changes made to the SA as a result of the consultation undertaken.
- 5.6 During the Redditch Examination hearing sessions in September 2014 the Inspector requested clarification on the cross boundary site selection process carried out as part of the Housing Growth Development Study and accompanying SA in January 2013. An Addendum to the HGDS and SA (the HGDS Addendum) was produced in November 2014.
- 5.7 On publication of external Hearing Statements for the cross boundary hearing sessions some queries were raised concerning the SA process. A further revision to the Redditch SA was produced by AMEC Foster Wheeler on behalf of RBC in March 2015. This was consulted on and republished in May 2015. The Bromsgrove District Plan (BDP) SA was also updated at this time (in house but verified by AMEC Foster Wheeler) to ensure alignment continued with the Redditch SA. Both the updated BDP SA and the BORLP4 SA May 2015 contained quality assurance checklists that demonstrated how the SA's complied with the SEA Directive (page 57 of the BDP SA)
- 5.8 A table showing all the responses to the SA consultation carried out between March and April 2015 was published on both Councils' websites. This included a summary of the response, officers' comments and proposed action (OED/33A). Corresponding

amendments were also made to both SAs as a result of this consultation (OED/ 33B – Redditch and OED/34 Bromsgrove).

5.9 At the Examination hearing sessions in June 2015 it was confirmed that the BDP SA did not in itself contain a detailed assessment of growth options for Redditch within the BDP area, and that it referred instead to the BORLP4 SA. The Inspector accepted this as a suitably pragmatic approach and saw no benefit in duplicating the exercise and the BDP SA (as updated) provided appropriate cross-references to the relevant documentation.

5.10 During the final cross boundary hearing session's concerns were re-expressed regarding various SA issues and at the final joint examination session on 24 March 2016 the Inspector requested a Legal Opinion commission by the Councils on whether the SAs complied with the SEA Directive. This Opinion confirmed legal compliance and was published on the Councils websites on 20 April 2016 (Reference ED/50-Legal Opinion on behalf of the Councils on SEA, April 2016).

5.11 A screening of the proposed Main Modifications to the BORLP4 following Examination found that no significant environment effects were likely and therefore further SA is not required. This screening is available as a separate document.

6. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives

6.1 This is explained in detail in the document entitled 'Borough of Redditch Local Plan No.4 Sustainability Appraisal May 2015' under the section titled 'The Borough of Redditch Local Plan No.4 and its Evolution' subsection '3.4 Consideration of Reasonable Alternatives' (page 17). This covers reasonable alternatives to accommodate all of Redditch's housing needs, both within Redditch Borough and in cross boundary locations.

6.2 At each stage of the evolution of the BORLP4, reasonable alternative options have been identified and appraised, with detailed explanation given on the reasons for choosing the proposed option, taking account of consultee representations, planning considerations and sustainability analysis. The Submission BORLP4 and accompanying SA set out detailed consideration of all the policies and potential housing sites and ensures that all reasonable alternatives were explicitly tested against one another. Particular attention was paid to the need to provide for development in Bromsgrove District to meet the needs of Redditch, and detailed evaluation of options relating to such strategic provision was undertaken and appraised.

6.3 The SA report identifies a number of likely effects associated with strategic sites and policy options and the likelihood and scale of these effects. Mitigation or remedial measures have also been proposed that maximise any predicted beneficial effects of the proposed options or approaches and that minimise any predicted adverse effects.

7. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (Regulation 16)

7.1 The significant environmental effects (and proposed mitigation measures) of the plan are summarised on page 40 of the Borough of Redditch Local Plan No.4 Sustainability Appraisal May 2015, under the section entitled '4.7 Overall Effects of the BORLP4 and Proposals for Mitigation'. These will be monitored as set out in this document (page 45) which states:

"4.8.2 Once the Local Plan is adopted, its significant effects will be assessed based on the monitoring of the sustainability indicators. This will help to measure how well the Local Plan contributes to sustainable development and informs any future review of plans and policies. Through this process, the significant effects predicted in this SA will be monitored via the Monitoring Report. The SEA Directive requires that the significant environmental effects of implementing the Local Plan should be monitored in order to identify unforeseen adverse effects, and to be able to undertake appropriate remedial action.

4.8.3 Data for the indicators will be collected at least annually in the Monitoring Report to monitor whether the Local Plan has made a positive contribution to sustainable development. Monitoring of the Local Plan will eventually be linked to monitoring the remainder of the documents in the Development Plan."

7.2 Potential indicators and targets have been developed and are detailed in Appendix A of the Borough of Redditch Local Plan No. 4 Sustainability Appraisal May 2015, furthermore, details relating to Monitoring are set out in the BORLP4 Proposed Submission document under the heading 'Monitoring and Implementation'.

Appendix A: Key Sustainability Issues and the Sustainability Framework

Topic	SA Objective	Issues and Trend
Managing waste in accordance with the waste hierarchy	(1) To manage waste in accordance with the waste hierarchy: reduce, reuse, recycle, compost, recovery, disposal	The level of household waste which is recycled in the Borough is amongst the lowest in the country.
Climate Change	(2) Reduce causes of and adapt to the impacts of climate change	The Borough has lower domestic, road transport and total CO2 emission than all other Districts in Worcestershire.
Reducing the need to travel	(3) To reduce the need to travel and move towards more sustainable travel patterns	A low percentage of the population cycle and walk to work in Redditch Borough compared to Worcestershire and England despite the average travel to work distance being shorter.
Redditch's Economy	4) Develop a knowledge driven economy, with the appropriate employment land, infrastructure and skills base whilst ensuring all share the benefits urban and rural	There is a high percentage of self-employed workers in the Borough compared to elsewhere and a high number of business registrations which is increasing at a higher rate than elsewhere. The demand for larger offices is not met by the current supply.
Community Involvement	(5) To provide opportunities for communities to participate in and contribute to decisions that affect their neighbourhood and quality of life, encouraging pride and social responsibility in the local community	Election turnout varies by ward across the Borough but is relatively low like much of the country.
Economic Diversity	(6) Promote and support the development of new technologies, of high value and low impact, especially resource efficient technologies and environmental technology initiatives	A high proportion of the Borough's population work in the manufacturing industry.
Natural resources	(7) Protect and improve the quality of water, soil and air and water resources	The percentage of river length in Redditch Borough assessed as having good biological quality is low. There are no air quality management areas in the Borough.
Flood risk	(8) Ensure development does not occur in high-risk flood prone areas and does not adversely contribute to fluvial flood risks or contribute to surface water flooding in all other areas	Defined flood zones cover a relatively small proportion of the Borough. There is evidence of flooding from both watercourses and sewers.
Vitality and Viability of Centres	(9) To improve the vitality and viability of Town and District Centres and the quality of and equitable access to, local services and facilities, regardless of age, gender, ethnicity, disability, socio-economic status or educational attainment	There have been no residential dwellings completed in Redditch Town Centre since 1996. There are a very low number of vacant units in Redditch town centre and in all district centres.
Landscape and	(10) Safeguard and strengthen landscape	There are three identified landscape

Topic	SA Objective	Issues and Trend
townscape	and townscape character and quality	character areas in the rural area of the Borough which can influence the location and form of new development. The issues related to townscape are not currently understood.
Biodiversity	(11) To conserve and enhance biodiversity and geodiversity	There is room for improvement in biodiversity provision and the standard of maintenance of nationally important resources.
Health and well being	(12) To improve the health and well-being of the population and reduce inequalities in health	There is a higher percentage of Redditch's population claiming disability benefits compared to averages. The percentage of the population living in the most deprived Super Output Areas in Redditch is falling.
	(13) Provide decent affordable housing for all, of all the right quality and tenure for local needs, in clean, safe and pleasant local environments	The supply of affordable housing does not meet demand in the Borough. The average house price in the Borough is below the regional average.
Qualifications and skills base	(14) To raise the skills levels and qualifications of the workforce	GCSE and A Level performance is relatively poor in Redditch and there is a high percentage of people with no qualifications/level unknown.
Crime and fear of crime	(15) Reduce crime, fear of crime and anti-social behaviour	The perceptions of crime and fear of crime are not relative to the actual low levels of crime in the Borough.
Historic Environment	(16) Conserve and enhance the architectural, cultural and archaeological heritage and seek well-designed, resource efficient, high quality built environment in new development proposals	There is a rich and varied stock of cultural and landscape assets which contribute to defining the Borough's character including both designated and non-designated assets.
Making the most efficient use of land	(17) Ensure efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural lands, land of Green Belt value, maximising use of previously developed land and reuse of vacant buildings, where this is not detrimental to open space and biodiversity interest	As a former new town, there is a limited amount of brownfield land and high levels of open space in Redditch compared to other districts.
Resource efficiency and renewable energy	(18) Promote resource efficiency and energy generated from renewable energy and low carbon sources	No Borough level data available

Taken from Borough of Redditch Local Plan No. 4 Sustainability Appraisal May 2015

Appendix B- Key Stages in the BORLP4 SA process

Document	Summary
Draft Sustainability Appraisal for the Core Strategy Issues and Options Document (May – June 2008)	<p>The purpose of this SA was to ensure that sustainability principles were incorporated into the plan at an early stage of production. The SA Framework was a sound basis for appraising the different Options set out in the Issues and Options Document. The Issues and Options Document contains issues which were determined after reviewing the plans, policies and programmes and baseline information in the Scoping Report, through ongoing informal consultation and through evidence gathering. Each Issue in the Issues and Options Document raised questions which needed to be answered and suggested a set of alternative Options which are intended as possible solutions to these questions. Each of these Options were assessed in this SA Report to give an indication of the sustainability of the different Options.</p> <p>The conclusions were there would be significantly harmful effects on sustainability if the ‘Business as usual/ Do nothing’ approach was taken. The SA demonstrated that, in most cases, a proactive approach to dealing with Issues was required. Mitigation measures were proposed in the SA to ensure the benefits of implementing some Options were maximised and that the harmful effects of implementing other Options were minimised.</p> <p>The SA tested the Plan’s Strategic Objectives against the Sustainability Appraisal Framework, developed the Plan Options, predicted the effects of the Plan, evaluated the effects of the Plan, considered ways to mitigating adverse effects and maximise beneficial effects and proposed measures to monitor the significant effects of implementing the Plan.</p>
Sustainability Appraisal for the Preferred Draft Core Strategy (Oct 2008 - Jan 2009)	<p>This SA demonstrated which options were the most appropriate to take forward. All new options raised since the Issues and Options SA were appraised in this SA which helps to justify the most appropriate approach taken in the Preferred Draft Core Strategy. There were open ended questions in the Issues and Options document, where no alternative options are presented. Following consultation, new issues have been identified for Redditch, and the Preferred Draft Core Strategy details the additional areas covered.</p> <p>In order to better understand the implications of including Strategic Sites in the Core Strategy, an appraisal of the sites was undertaken in this SA. The SA Objectives and decision making criteria have been used in the assessment of each site. Each site has then been scored against assessment criteria.</p> <p>This SA also includes an Appropriate Assessment, also known as a Habitats Regulations Assessment and has demonstrated that the Core Strategy would have no effects on the nearest Natura 2000 designated site at Bredon Hill, Wychavon.</p>
Sustainability Appraisal for the Revised Preferred Draft Core Strategy (Jan - March 2011)	<p>During the Core Strategy production lots of changes have impacted on how Redditch prepares the Core Strategy and when the policy approaches need to change the Borough Council needs to assess what effects these changes will bring. This is the focus of this SA. Following the change of Government in May 2010, the Government announced the abolition of Regional Spatial Strategies and the development requirements embedded in them, in favour of locally derived development targets.</p> <p>The impacts of locally generated housing targets and other development targets (where appropriate) have been assessed in this SA.</p>
Sustainability Appraisal for the Draft Borough of Redditch Local Plan No.4 (January 2013)	<p>The Draft Core Strategy was refocussed and presented as a Local Plan following amendments to the Planning and Compulsory Purchase Act 2004, the publication of the Town and Country Planning (Local Development) (England) Regulations 2012 and the introduction of the National Planning Policy Framework (NPPF) (March 2012).</p> <p>Guidance in the NPPF was clear that locally generated development targets needed to be evidence based taking account of, amongst other things, the Borough’s objectively assessed housing need.</p> <p>Under the remit of the Duty to Co-operate, Redditch Borough Council addressed the issue of cross boundary growth to meet its development needs with Bromsgrove District Council. The Housing Growth Development Study (HGDS), which informed the Draft BORLP4, was undertaken jointly by the two Local Authorities and was subject to a specific Sustainability Appraisal, which is referenced in the BDC Post Adoption Statement.</p>
BORLP4 Proposed Submission Sustainability Appraisal (September 2013)	<p>This version of the Sustainability Appraisal was prepared to reflect the proposals in the Proposed Submission version of the Local Plan. This was the version submitted to the Inspector to be Examined.</p>
BORLP4 Sustainability Appraisal Refresh (November 2014)	<p>This version of the SA was updated to reflect the changes made to Proposed Submission version of the SA and the Proposed Submission version of the Local Plan.</p>
BORLP4 Sustainability Appraisal (March and May 2015)	<p>A final SA report was produced in May 2015 as part of the iterative process of SA, incorporating some changes made during consultation in March 2015. This document informed the cross boundary site selection process.</p>
BORLP4 – Proposed Main Modifications Screening Matrix 2016 (Appendix B)	<p>SA screening of the Inspector’s proposed Main Modifications was carried out but the Council did not consider that the modifications proposed by the Inspector (nor minor ones proposed by the Council) would lead to significant changes and therefore did not require further consultation or SA work</p>