South Norfolk Council

Long Stratton Area Action Plan

Environmental Adoption Statement (prepared under Regulation 16 of the Environmental Assessment of Plans and Programme Regulations 2004)

May 2016
<table>
<thead>
<tr>
<th>Contents</th>
<th>Page No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction</td>
<td>3</td>
</tr>
<tr>
<td>a) How environmental (and sustainability) considerations have been</td>
<td>3</td>
</tr>
<tr>
<td>integrated into the plans</td>
<td></td>
</tr>
<tr>
<td>SA Scoping Report</td>
<td>4</td>
</tr>
<tr>
<td>Long Stratton Area Action Plan (various stages)</td>
<td>5</td>
</tr>
<tr>
<td>Habitats Regulations Assessment</td>
<td>6</td>
</tr>
<tr>
<td>b) How the environmental report (Sustainability Appraisal) has been</td>
<td>7</td>
</tr>
<tr>
<td>taken into account</td>
<td></td>
</tr>
<tr>
<td>c) How opinions expressed in response to:</td>
<td>9</td>
</tr>
<tr>
<td>i. The invitation referred to in regulation 13(2)(d);</td>
<td>9</td>
</tr>
<tr>
<td>ii. Action taken by the responsible authority in accordance with</td>
<td>10</td>
</tr>
<tr>
<td>regulation 13(4) have been taken into account</td>
<td>14</td>
</tr>
<tr>
<td>Sustainability Appraisal Scoping consultation (2010)</td>
<td></td>
</tr>
<tr>
<td>Long Stratton Area Action Plan (various stages)</td>
<td></td>
</tr>
<tr>
<td>Main Modifications consultation</td>
<td></td>
</tr>
<tr>
<td>d) How the results of any consultations entered into under regulation</td>
<td>14</td>
</tr>
<tr>
<td>14(4) have been taken into account</td>
<td></td>
</tr>
<tr>
<td>e) The reasons for choosing the plans as adopted, in the light of</td>
<td>14</td>
</tr>
<tr>
<td>other reasonable alternatives;</td>
<td></td>
</tr>
<tr>
<td>f) The measures that are to be taken to monitor the significant</td>
<td>15</td>
</tr>
<tr>
<td>effects of implementation of the plans</td>
<td></td>
</tr>
</tbody>
</table>
Introduction

South Norfolk Council adopted Long Stratton Area Action Plan (LSAAP) on Thursday 26 May 2016. In accordance with Regulation 16 of the Environmental Assessment Plans and Programmes Regulations 2004, the Council has prepared this adoption statement that sets out:

a) How environmental (and sustainability) considerations have been integrated into the plan;

b) How the environmental report (Sustainability Appraisal) has been taken into account;

c) 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;

d) How the results of any consultations entered into under regulation 14(4) have been taken into account;

e) The reasons for choosing the plan as adopted, in the light of other reasonable alternatives; and

f) The measures that are to be taken to monitor the significant effects of implementation of the plan

This statement is a summary of information contained within the Sustainability Appraisal (SA) document and other relevant documents produced during the preparation of the Long Stratton Area Action Plan, including the additional SA to reflect the modifications made by the Inspector. The documents referenced and quoted can be viewed in full on the Council’s website at www.south-norfolk.gov.uk. Particular links to key documents are given throughout the statement.

a) How environmental (and sustainability) considerations have been integrated into the plan

SA was an integral part in the preparation of the Local Plan document, as this section demonstrates.

Under the Planning and Compulsory Purchase Act (2004), the Council is required to produce a SA Report for each Local Plan document it prepares. The overall purpose of the SA process is to promote sustainable development through the consideration of social, environmental and economic concerns in the preparation of a Local Plan document and to evaluate reasonable alternatives. SA also incorporates the requirements for a Strategic Environmental Assessment required by European Directive 2001/42/EC (the SEA Directive).

The SA process actually began before the preparation of the LSAAP. The overall effects of the pattern of growth in South Norfolk was assessed as part of the SA of
the (now-adopted) Joint Core Strategy (September 2009) and sustainability concerns were taken into account during this process.

**SA Scoping Report**

The SA Scoping Report was published in 2010. It covers all the South Norfolk Local Plan Documents together and provides the baseline for the consideration of environmental concerns. It included a review of the environmental objectives of all relevant plans, programmes and policies, provides a baseline of key environmental, social and economic data and identifies issues and problems which need to be addressed through the South Norfolk Local Plan documents. A copy of the SA Scoping Report can be viewed online at [http://www.south-norfolk.gov.uk/planning/media/B105_B110_General_Direct_Documents_part_10.zip](http://www.south-norfolk.gov.uk/planning/media/B105_B110_General_Direct_Documents_part_10.zip)

The Scoping Report also provided a SA framework and set of objectives for the assessment of all sites and policies in the Local Plan documents. The framework included 9 key environmental objectives, alongside 8 social and 5 economic objectives.

The SA Scoping Report was consulted on widely with both statutory consultees and a number of other organisations. The consultation provided useful feedback on the key environmental, economic and social factors which have helped to shape the development of the South Norfolk Local Plan documents. Consultation comments were considered carefully and as result some minor amendments were made to the SA framework and objectives.

Following consultation on the SA Scoping Report, the LSAAP followed the process shown in the table below:

**Table showing the process of preparation of the Long Stratton Area Action Plan and how Sustainability Appraisal has been incorporated at each stage**

<table>
<thead>
<tr>
<th>Date</th>
<th>Long Stratton Area Action Plan and Sustainability Appraisal</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>Issues and Options consultation including consultation on Site Assessment Criteria (SA Scoping Report)</td>
</tr>
<tr>
<td>2011</td>
<td>Issues and Options consultation</td>
</tr>
<tr>
<td>2011</td>
<td>'Long Stratton 2026’ consultation</td>
</tr>
<tr>
<td>2013</td>
<td>Preferred Options consultation (Interim SA Report)</td>
</tr>
<tr>
<td>2014</td>
<td>Publication of proposed submission plans and SA reports (Reg 19)</td>
</tr>
<tr>
<td>2015</td>
<td>Submission of plans and examination (including Hearings)</td>
</tr>
<tr>
<td>2015-2016</td>
<td>Publication of proposed modifications and plan finalisation (Inspector’s Report) and SA of modifications</td>
</tr>
</tbody>
</table>
There follows a brief description of the main stages of preparation for the Local Plan document to demonstrate how environmental considerations and SA was integrated into plan preparation at each stage in the process:

**Long Stratton Area Action Plan**

**Site Specific Allocations and Policies (including Long Stratton) Issues and Options (2010):**
Around 900 sites across South Norfolk, including 21 potential sites in the parishes of Long Stratton and Tharston, were consulted on in 2010 alongside the SA Scoping Report and draft site appraisal criteria. No appraisal of sites was undertaken at this stage and hence no SA document was published as part of the consultation, although there was also consultation on a site assessment checklist (which would later form the basis of the site assessment process).

**Site Specific Allocations and Policies (including Long Stratton) Issues and Options (2011):**
A further 147 potential sites were suggested through the 2010 consultation (3 in Long Stratton) so a second Issues and Options stage consultation took place in 2011. Again no appraisal of sites was undertaken at this stage so no SA document was published as part of the consultation. A further 2 sites were suggested across the LSAAP area through this consultation.

**Long Stratton 2026 (2011):**
In parallel with the 2011 consultation, the Council also first consulted specifically on the LSAAP in 2011. A leaflet and survey called ‘Long Stratton 2026’ were prepared with input from Long Stratton Parish Council and sent to all homes and businesses in the parish of Long Stratton and the immediately adjoining parishes, as well as a large number of other consultees. This survey was widely publicised alongside the Site Specific Allocations and Policies and at a series of exhibitions and meetings in the Council offices, Long Stratton Library, the Leisure Centre, the High School and the Co-Op car park. The consultation was high level and was not accompanied by a Sustainability Appraisal. However the Council did ask questions about where people undertook a range of day-to-day activities and what enhancements to existing services and facilities would encourage them to stay in Long Stratton for more of these, and what would encourage them to walk and cycle more for local journeys. This helped to develop the options subsequently assessed in the SA Report.

**Preferred Options (2013):**
An Interim SA was published at the preferred options stage. This Interim SA tested the objectives of the LSAAP against the SA Framework; assessed each of sites put forward at earlier stages against a detailed site assessment checklist (developed from the site assessment checklist consulted on in 2010); which in turn allowed broad options for housing and employment growth to be developed and evaluated. The LSAAP Interim SA also developed and assessed proposed policies for the town
centre; environment and recreation; accessibility; and the development boundary. As a result of the detailed sustainability exercise the Council was able to identify two preferred options for locating housing, employment and other uses in Long Stratton which were subject to public consultation.

Pre-Submission (2014):
The pre-submission version of the document was accompanied by an updated SA (http://www.south-norfolk.gov.uk/planning/media/F3_Sustainability_Appraisal_of_the_Pre_Submission_LSAAP_July_2014.pdf) and both were then submitted to the Secretary of State for independent examination in March 2015.

Examination
The Long Stratton Area Action Plan and accompanying SA Report were submitted to the Secretary of State for examination in March 2015. The hearing sessions took place in July 2015. Before, during and after the hearing sessions in July 2015 the Inspector requested the Council to draft some modifications to the plan. Following the hearing sessions, the Inspector asked the Council to consider which, if any, of the draft main modifications would require further Sustainability Appraisal.

The Council therefore produced an additional SA document after the examination hearings, to clarify the SA of two of the Inspector’s Main Modifications (the proposed widening of the corridor of the bypass and the removal of the indicative employment areas from LNGS1 on the Policies Map/replacement with criteria within the policy wording). This additional SA document is:


This document was prepared to show clearly how the Inspector’s Main Modifications performed against the SA Framework. The Inspector’s modifications were shown to provide more flexibility in the delivery of employment land and the bypass.

The Council received the Inspector’s Report (http://www.south-norfolk.gov.uk/planning/media/Long_Stratton_Area_Action_Plan_Inspectors_Report_26_April_2016.pdf) on the examination of the LSAAP in April 2016. Subject to a number of main modifications being made, the documents were found to be “sound” and in doing so, the Inspector accepted that the Council’s approach to SA was adequate.

Habitats Regulations Assessment
To comply with European legislation, a Habitats Regulation Assessment (HRA) under the Habitats Directive (1994) is mandatory for all relevant development plan
documents. This is to ensure that policies and proposals will avoid adverse effects on certain habitats of national and international significance, whether these are already protected by a formal designation or are sites proposed for such protection. The Long Stratton Area Action Plan may only be adopted after it has been shown that it will not adversely affect the integrity of the sites concerned.

Two Appropriate Assessment screening reports were undertaken by Norfolk Council, one jointly for the SSAPD, WAAP, Long Stratton AAP and Cringleford Neighbourhood Plan (http://www.south-norfolk.gov.uk/planning/media/C9_C18_Submission_Documents.zip) and a second for the DMPD (http://www.south-norfolk.gov.uk/planning/media/C62_C65_Submission_Documents_Development_Management_Policies_Documents.zip). They conclude that site proposals within the Local Plan documents either alone, or in combination with other growth proposals identified by the JCS, would be unlikely to have an adverse effect upon the integrity of any European site, subject to the delivery of the necessary mitigation as set out in the Appropriate Assessment of the JCS.

b) How the environmental report (Sustainability Appraisal) has been taken into account

The environmental (sustainability appraisal) report was taken into account throughout the various stages of the plan making process from the drafting of preferred options onwards and helped to inform the proposals for reasonable alternatives for growth in Long Stratton, through the detailed assessment of sites and the allocation of preferred sites. The SA process considered the mitigation of short, medium, long term, cumulative and synergistic impacts of development and monitoring measures. SA was also key in the development of other non-site specific policies in the LSAAP, such as the town centre policy, environment and recreation policy etc. The findings and recommendations outlined in the various SA reports were taken into account through the amending and finalising of Plan objectives, policies and site selection.

Specifically the environmental report has been taken into account in the following ways through the production of the LSAAP:

- Review of plans, programmes and policies identified a number of key issues that needed to be included when developing the Local Plan documents;
- The identification of key sustainability issues presented an opportunity to address these through policies within the Local Plan documents;
- The LSAAP objectives were tested against the SA Framework to identify and understand potential conflicts. This process identified potential conflicts relating to the allocation of land and environmental protection considerations, areas of flood risk, air quality, the distinctiveness of Long
Stratton townscape and surrounding landscape, minimising loss of undeveloped land and impacts on water quality. It was considered that these impacts could be overcome or mitigated by the appropriate location of development sites and the application of suitable mitigation measures and these were explored through the SA process;

- All individual sites suggested for development were subject to rigorous assessment through the SA process against a detailed site assessment checklist. This enabled the Council to identify preferred options for public consultation at the preferred options stage. The detailed site checklist was informed by and tested against the SA Framework to increase the robustness of the site selection process. Site assessment allowed the comparison of sites, allowed issues to be identified and the identification of mitigation measures which translated into policy criteria. Site assessment allowed the identification of mitigation measures which could be translated into policy criteria to mitigate any potential adverse impacts of development;

- The SA also considered a number of broad distribution options for new housing and employment land in Long Stratton. The effects of the options were predicted, evaluated and mitigated and conclusions were drawn which allowed the identification of preferred options for public consultation;

- The LSAAP is more than simply an assessment of sites suggested for development, it also contains non site specific policies and proposals which have been included either because of a direct link to JCS policy, a request from a particular organisation or group or to reflect current planning issues in Long Stratton. Although many of these policies and proposals do not have an alternative option, they were still subject to SA to identify any potential effects which needed to be mitigated through the policies in the plan;

- Short, medium, long term, cumulative and synergistic impacts were evaluated through the SA process which supported the approach taken. It was concluded that the approach to development in the LSAAP document will have a number of environmental effects. In order to meet the need for housing and employment land the majority of new allocations will need to be on greenfield sites, so there will inevitably be some loss of agricultural land and some impacts on landscape character. However there is also likely to be an increase in the self-sustainability of Long Stratton through reaching a better balance of homes and jobs, reduced traffic in the new ‘town centre’ due to the bypass, greater levels of walking, cycling and public transport use and significantly improved levels of green infrastructure in and around the town to alleviate pressure on nearby environmentally sensitive areas.
Public engagement is an important aspect of the plan making process. Changes have been made to the document to take account of issues and concerns raised by consultees up to and including the examination in public. An SA Report has been published with each consultation version of the plan since preferred options stage and consultation bodies and the public were invited to comment on both the document and the accompanying SA at each stage. The Council has produced a Consultation Statement for LSAAP (both Regulation 19 and Regulation 22(1)(c)) which sets out who was consulted, how they were consulted, a summary of the main issues raised in response to the consultation and how the representations made have been taken into account, with the aim of showing how the decision making process has taken account of consultees’ opinions on the plan and accompanying environmental report at each stage in the plan making process. Throughout the preparation of the LSAAP the Council has sought to address the issues raised through the consultation exercises and to reflect these concerns in the content and wording of policies.

In addition to the Consultation Statement, which lists all representations received and the Council’s responses, the Council has also prepared a separate appendix for the SA document to specifically pull out the Sustainability comments received and Council’s response to them. This appendix (number 12) was updated for the examination to take account of SA comments received at pre-submission stage and can be found at the following link: http://www.south-norfolk.gov.uk/planning/media/F5b_LSAAP_Statement_of_Consultation_Appendices_4_to_12.pdf

How the results of public consultation on the plan and sustainability appraisal have been taken into account are considered for the document below. Further details can be found in the relevant Consultation Statements:

**Sustainability Appraisal Scoping consultation (2010)**

Initial consultation on the draft SA Scoping Report took place in 2005/06 at a time when South Norfolk was preparing the Issues and Options stage of a stand-alone Core Strategy and Site Specific Proposals. Comments were sought from the four statutory Sustainability Appraisal bodies at that time: Environment Agency, Countryside Agency, English Nature and English Heritage as well as seven neighbouring local authorities and other stakeholders with environmental, economic and social responsibility. A further consultation took place in 2010 after South Norfolk Council joined with neighbouring local authorities to work on a Joint Core Strategy (JCS). The representations received suggested a number of minor and technical additions and corrections and did not raise any significant issues that would necessitate major changes to the SA appraisal or re-consultation.
Long Stratton Area Action Plan

Issues and Options Consultation (Regulation 18 stage, formerly Regulation 25) (2010 and 2011)

These were the same consultations that took place for the Site Specific Allocations and Policies Document. 44 responses related to issues to consider for the Long Stratton AAP.

Comments specifically related to Long Stratton from the 2010 consultation were:

- Issues relating to levels of growth, landscape preservation, overloading services, traffic volumes, preserving local historic and landscape character and appropriate density
- Major constraints at the waste water treatment works

The Council’s response was:

- To take forward the comments about sites and issues when developing the Long Stratton AAP.

75 comments specifically related to Long Stratton from the 2011 consultation.

Overall, the general (District-wide) comments can be summarised as:

- Concern about the capacity of social infrastructure, particularly schools and health care services to cope with proposed growth, particularly in the small rural service villages
- The need to protect important open spaces, form and character, landscapes, maintain gaps between settlements and key viewpoints were also a common theme in many responses
- Concerns over potential scale of development of some sites; loss of agricultural land; impact on public and private amenity; traffic impacts and site access issues; there should be no net loss of woodland; some water infrastructure capacity issues and underlying minerals; concerns over road safety and increased traffic levels (including on adjoining parishes).

The Council’s response was:

- To take forward the comments and issues raised relating to Long Stratton to inform the initial Regulation 18 Long Stratton AAP consultation
- To commission landscape consultants Chris Blandford Associates to undertake a Landscape Study to review the Local Landscape Character Areas, River Valleys and Strategic Gaps and Important Breaks to inform the Preferred Options stage of the Site Specific Allocations and Policies Document and Area Action Plans for Long Stratton and Wymondham and
to inform the merging policies in the Development Management Policies Document

- To take forward the comments on Central Business Areas, Primary Shopping Areas, protection of important spaces, frontages or other suggested designations to the Development Management Policies Document for further consideration and also inform work on Areas Action Plans.
- To consider the additional sites that were suggested, and gather views from Specific Consultees, infrastructure/service providers and parish/town councils.

A summary of all the representations received to both consultations and the Council's responses and actions are included as an appendix to Consultation Statement (previous link).


The first stage of public consultation specifically on the LSAAP took place in 2011. The consultation included sending a leaflet/survey to every household and business in the parish of Long Stratton and surrounding parishes. The Council also wrote to a large number of other people including agents and developers, government organisations, neighbouring local authorities and parish and town councils and neighbouring parish councils, local schools, environment, heritage and amenity groups and transport and utility bodies (as detailed in appendix 1 of the Consultation Statement).

A consultation report was published which summarised the results (see appendix to the consultation statement). The key issues were:

- Majority of respondents access services in Long Stratton rather than travelling elsewhere. (This could be because most people who completed the questionnaire either live or work in Long Stratton rather than visit it)
- Respondents wanted to see a broad range of shops, services and facilities provided in Long Stratton
- The provision of a bypass to resolve traffic congestion, road safety, noise and pollution would encourage more people to use the village centre and encourage more cycling and walking
- Majority of respondents said the frequency of the bus service was good but the quality of the waiting services was poor
- If the bypass, 1800 homes and new employment sites are all forthcoming in Long Stratton, the majority of respondents were concerned with education and health services provision

The key issues were taken forward and used to develop a vision and set of objectives for the Long Stratton AAP.
Preferred Options (Regulation 18) (2013)

Formal public consultation on the Long Stratton AAP Preferred Options and Sustainability Appraisal took place between May and July 2013. An appendix to the Consultation Statement sets out the list of Specific Consultees who were invited to submit representations at this stage. In addition a number of other stakeholders and members of public were also consulted. A total of 499 representations were made.

The key issues were:

- Concern about infrastructure capacity of Long Stratton to accommodate new growth, in particular: lack of doctor surgeries, shops, education facilities, health care and policing infrastructure.
- Concern about open space and new burial provision and request for a more detailed approach within the AAP to address these issues.
- Concern that there was a lack of variety of provision for employment.
- Concern that development will impact upon biodiversity, geodiversity and the historic environment.
- Significant objections were made to the bypass phasing policy.
- Concern was raised that the proposed development would generate significant traffic.

The Council's response was:

- Consultation with Norfolk County Council (Education Authority) confirmed that there is sufficient capacity at the existing High School for further expansion. A policy was provided to produce a masterplan showing social and community infrastructure.
- A new policy was added to reflect current burial rates and support a new burial ground in Long Stratton.
- Additional detail of new recreation provision in Long Stratton was added.
- A text change was added to reflect appropriate mix of local job opportunities.
- Text has been added within the appropriate policies and supporting text of the Environment, Recreation, Employment and Town Centre sections.
- The council concludes that the bypass phasing approach allows for the right balance between sufficient development to fund the initial phases of the bypass and ensures that impact from additional development is managed in a sustainable way.
- The provision of housing will enable the delivery of the bypass which will reduce town centre traffic.

Regulation 19 Publication of proposed submission plans and SA reports (2014)

At this stage, the public has an opportunity to comment, although this is not formally a consultation stage. A total of 170 representations were made. The key issues raised were:

- Concern about infrastructure capacity of Long Stratton to accommodate new growth, in particular: lack of doctor surgeries, shops, education facilities, health care and policing infrastructure.
- Concern about open space and new burial provision and request for a more detailed approach within the AAP to address these issues.
- Concern that there was a lack of variety of provision for employment.
- Concern that development will impact upon biodiversity, geodiversity and the historic environment.
- Significant objections were made to the bypass phasing policy.
- Concern was raised that the proposed development would generate significant traffic.
LSAAP

- Concern for the high housing target
- Limited evidential basis for the 250 occupation threshold for new homes (bypass), 1000 dwelling occupation threshold (waste water) and the 200 dwelling completion (link road A140 – Swan Lane).
- Single allocation policy is not essential to ensure delivery of the proposed growth in Long Stratton
- The plan contains insufficient detail of social infrastructure requirements and their delivery mechanisms
- Further explanation as to the definition, function and legal status of a 'common', and whether woodlands and commons form part of the overall open space requirements.
- CIL and s106 requirements should be detailed within the AAP
- Impact of the volume of traffic that will be generated by the additional growth (including surrounding villages/roads to Long Stratton), design and delivery of the bypass and certainty of the Hempnall roundabout (guaranteed funding and delivery).
- Clarity/certainty required as to how delivery and funding of the bypass is to be 'split'.
- A transport assessment is required to support the AAP
- New/updated evidence for outdoor sports/children’s play should be reflected within the final version of the AAP. Specific child/adult open space, GI and woodlands/commons requirement should be detailed within Policy LNGS1 (which would negate the need for Policy LNGS8)
- Greater flexibility/less prescription in the identification of the extent/location of the proposed town centre extension.

Sustainability Appraisal

- Lack of consideration to 'other' reasonable alternatives to the growth of Long Stratton including any settlement boundary changes
- Concern that impacts of the proposed development on surrounding villages has not been considered
- The need for additional social infrastructure has not been properly assessed through the SA process
- The under-representation in evaluation of the potential negative effects of development on the east side of Long Stratton
- The loss of ‘best and most versatile’ agricultural land and the absence of supportive evidence to illustrate land of lower environmental quality have been assessed as a suitable alternative.

The Council assessed the representations received and the Council’s agreed course of action of each representation falls into the following categories:
- No action required
- Potential changes which could be addressed by making some minor amendments or small changes to the plan without affecting its substantive content or soundness.

A summary of all the representations received and the Council’s responses and actions are included as an appendix to Consultation Statement.

**Main Modifications consultation (2015-16)**

Following the completion of the Examination Hearing sessions on the Long Stratton Area Action Plan, the Council consulted on proposed Main Modifications to the Plan from December 2015 to January 2016. The modifications are intended to address issues of legal compliance and/or soundness. Consequently representations were sought on whether the Proposed Main Modifications, Sustainability Appraisal information and Policies Maps changes satisfactorily address matters of soundness and/or legal compliance. The Inspector reflected on the changes put forward by the Council and all representations made in responses to them when preparing her final report.

An additional SA was prepared to address any mitigation needed related to the Main Modifications. This can be found online here: [http://www.south-norfolk.gov.uk/planning/media/LSAAP_Sustainability_Appraisal_of_Proposed_Main_Modifications_MM6_and_MM12_DEC15.pdf](http://www.south-norfolk.gov.uk/planning/media/LSAAP_Sustainability_Appraisal_of_Proposed_Main_Modifications_MM6_and_MM12_DEC15.pdf)

d) **How the results of any consultations entered into under regulation 14(4) have been taken into account**

Regulation 14(4) relates to where the Secretary of State receives a request from another EU Member State indicating that it wishes to enter into consultations on trans-boundary impacts before the adoption or submission of a plan or programme. This is not relevant to the Long Stratton Area Action Plan as no such request was received and therefore no additional consultation of this nature was undertaken.

e) **The reasons for choosing the plan as adopted, in light of other reasonable alternatives;**

This section provides a summary to explain how reasonable alternatives were considered and why the adopted plan was chosen when compared with the other reasonable alternatives considered during its preparation.

It is important to note that some aspects of the consideration of alternatives were dealt with through the preparation of the JCS such as the determination of the settlement hierarchy, the locations for major growth and the quantum of growth to be allocated to Long Stratton. The LSAAP has been prepared to be in general conformity with the JCS.
The consideration of alternatives has been fundamental in the development of the LSAAP. Initially the LSAAP followed the same site assessment process as the Site Specific Allocations and Policies Document; all sites were appraised individually against a detailed site assessment checklist and conclusions drawn.

Because of the high level of growth allocated to Long Stratton in the JCS and the need to consider this against a number of constraints affecting the location and quantum of growth, the Council felt that the SA needed to look at broad options for growth in addition to the individual assessment of sites. The Council therefore used the results of the individual site assessments together with comments from public consultation, the objectives of the AAP and the key sustainability issues identified in the SA Scoping Report to develop a number of options for the distribution of housing and employment growth in the town.

To enable the effects of the options for the distribution of housing and employment growth in Long Stratton to be predicted each option was tested against the SA Framework. This showed that each option has potential positive and negative effects which have been summarised and evaluated in the SA document to allow the Council to develop its Preferred Options for housing and employment growth.

The Council also tested the other policies and proposals in the AAP against the SA Framework to determine whether these would have any significant effects. It was shown that the other policies and proposals would have either positive or neutral effects.

The LSAAP SA Report also looked at short, medium and long term impacts as well as cumulative and synergistic impacts and concludes that significant effects, both positive and negative are likely in a number of areas from the proposed approach but that it is possible to reduce or avoid many of these.

In following this process, the adopted Long Stratton Area Action Plan has encompassed the site allocation and policy options which performed best in overall sustainability terms. Other reasonable alternative options did not perform as well against the SA Framework.

f) **The measures that are to be taken to monitor the significant effects of implementation of the plans**

The SEA Directive requires the significant environmental effects of plans and programmes to be monitored, in order to identify at an early stage unforeseen adverse effects and to be able to take appropriate action where necessary. Monitoring of significant effects will also include social and economic effects that have been predicted through the SA.
Under Section 35 of the Planning and Compulsory Purchase Act 2004 planning authorities are required to monitor and report on the implementation of Local Plan policies. The Sustainability Appraisal indicators must also be monitored.

The JCS has a policy on implementation (JCS 20) and discusses monitoring. The three district councils of the GNDP produce a single combined Authority Monitoring Report each year, principally to monitor the JCS and the adopted Local Plan documents, including Sustainability Appraisal objectives.

The SA report for the Long Stratton Area Action Plan uses the same monitoring framework and will track the same indicators as the JCS, which will be reported in the AMR. This will ensure that the significant effects of implementing the plan are monitored.

The Council is committed to working with its GNDP partners to ensure that the monitoring framework is up to date and reflects the key issues that have emerged through the plan making/SA process.

In addition to this the LSAAP contains monitoring frameworks to track the implementation of the policies in the plan. It is intended that these more local indicators will be reported on as an appendix to the wider AMR document.