



South Cambridgeshire Local Development Framework Health Impact Assessment Supplementary Planning Document

Sustainability Appraisal / Strategic Environmental Assessment Adoption Statement

Introduction

South Cambridgeshire District Council adopted the Local Development Framework (LDF) Health Impact Assessment Supplementary Planning Document (SPD) on 8 March 2011.

This statement has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), which require a statement to be produced on adoption of a plan or programme, to detail:

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

Planning Policy Statement 12 widens these considerations from environmental, to broader sustainability issues, so that this statement provides information on the wider sustainability appraisal process.

This statement examines each of these points in turn.

1. How sustainability considerations have been integrated into the plan

The LDF aims to improve the overall quality of life for residents of South Cambridgeshire in a way, which will also benefit future generations. Taking a sustainable approach to economic, social and environmental issues is at the heart of the plan and will be closely related to the national strategy for sustainable development, which has four objectives:

- Social progress which recognises the needs of everyone;
- Effective protection and enhancement of the environment;
- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

Policy Context

The national context is set out in Planning Policy Statements (the replacement to Planning Policy Guidance Notes), Circulars and other advice from Government. Whilst some of those national policies require local interpretation, a great number do not.

The regional context is set out in the East of England Plan that was published by the Secretary of State in May 2008. It continues the strategy that was set out in the Regional Planning Guidance for East Anglia (RPG6). It aims to focus a higher proportion of Cambridgeshire's growth into the Cambridge Sub-Region and proposes a sequential approach to the planning of development, with much of the development concentrated into and on the edge of Cambridge (subject to a review of the Cambridge Green Belt), including development in South Cambridgeshire, and into a new town beyond the outer boundary of the Green Belt.

The East of England Plan 2008 replaced the Cambridgeshire and Peterborough Structure Plan when it was published in its final form by the Secretary of State in May 2008. A number of Structure Plan policies were 'saved' after September 2007 and remain valid until they will be superseded by policies in LDFs as these plans are adopted across the County.

Health Impact Assessment SPD Policy Approach

The Health Impact Assessment SPD expands on district-wide policy DP/1 in the Development Control Policies Development Plan Document (DPD), adopted in July 2007, and in the adopted Area Action Plans for Northstowe, Cambridge East, Cambridge Southern Fringe and North West Cambridge. These policies seek to ensure the creation of healthy and inclusive communities and that Health Impacts on populations are adequately addressed throughout the development process.

The SPD builds on international guidance, Gothenburg consensus paper on Health Impact Assessment - Main concepts and suggested approach (December 1999) ⁽¹⁾, the European Commission Health & Consumer Protection Directorate-General paper “Ensuring a high level of health protection A practical guide” (December 2001) ⁽²⁾ and on national guidance, Introducing Health Impact Assessment (HIA): Informing the decision-making process (2002), and recognised good practice contained in The Merseyside Guidelines for Health Impact Assessment (May 2001) ⁽³⁾.

The overarching objective of the SPD is to assist achievement of the Development Control Policies DPD Objective DP/e “To ensure that major new developments create distinctive, sustainable and healthy environments that meet the needs of residents and users, contribute towards the creation of vibrant socially inclusive communities.”

Specific objectives for the Health Impact Assessment SPD are as follows:

- Assist applicants’ and agents’ understanding of whether a Health Impact Assessment is required;
- Assist applicants’ and agents’ understanding of Health Impact and its relationship to other assessments such as Environmental Impact Assessments (EIA);
- Assist applicants and agents to help identify important health impacts and ensure that proposed developments carefully consider key determinants to protect human health;
- Assist applicants and agents to gain planning decisions quickly by informing them of what information is required to accompany applications, to justify their proposals and to demonstrate what impact the proposals may have on human health.

2. How the Sustainability Appraisal had been taken into account

The Sustainability Appraisal has contributed to plan development by providing an independent assessment of the sustainability of the Council’s proposed options and policies as they were developed. It demonstrates that sustainability considerations have been incorporated into the development of the LDF and subsequently that of the SPD from an early stage, and provides a formal statement and audit trail of the assessment.

¹ Gothenburg Consensus Paper on Health Impact Assessment, European Centre for Health Policy, WHO-Euro, Brussels 1999

² European Commission Health & Consumer Protection Directorate-General paper “Ensuring a high level of health protection A practical guide” (December 2001)

³ Scott-Samuel, A., Birley, M., Ardern, K., (2001). *The Merseyside Guidelines for Health Impact Assessment*. Second Edition, May 2001. 20 pages. ISBN 1 874038 56 2. Published by the International Health Impact Assessment Consortium.

The Sustainability Report is a key output of the plan preparation process. It reflected and supported the draft plan on which formal public consultation and participation was carried out.

The SPD is adding detail to policies to assist the implementation of adopted Development Plan Document policies and therefore the process had begun with the preparation of a Sustainability Report for these DPDs. The policies in these DPDs were therefore subject to Sustainability Appraisal.

It was decided not to do a Sustainability Appraisal for the SPD as recent changes to planning legislation makes it clear that government no longer requires an SA to be undertaken for SPDs. The Town and Country Planning (Local Development) (England) Regulations 2004 were amended in 2008 and 2009. Following the 2009 amendments there is no longer a requirement to undertake a SA of SPD. The European Union Strategic Environmental Assessment (SEA) Directive (2001/42/EC) only requires assessment of those LDDs likely to have a *significant effect*. As SPDs are not able to create new policy and the parent policies, upon which the SPD expands, have already been fully appraised through the SEA / SA process, the Council considers that there is no need to undertake further assessment of the SPDs. The SA for the parent policies can be viewed on the Council's website: www.scams.gov.uk/ldf.

One of the requirements of the SEA Directive is to monitor the *significant environment effects* of the implementation of plans to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action. Although there are not anticipated to be any significant impacts beyond any identified in the SA of the parent policies, the impact of the SPDs can be monitored through the LDF Annual Monitoring Report.

3. How consultation taken into account (draft plan and the Environmental Report)

In this statement the Council is required to detail how opinions expressed in response to consultation have been taken into account.

Key Environmental Bodies

The Strategic Environmental Assessment Directive requires that authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information, which must be included in the Environmental Report. In England, the key bodies are the Environment Agency, English Heritage and Natural England.

Consultation on a draft of the LDF Sustainability Appraisal Scoping Report with these key bodies was carried out in June 2004. The consultation enabled these bodies to comment on the appropriateness of the objectives, indicators, baseline assessment and issues / problems. A report on the outcome of these consultations is included in Appendix 7 of the Scoping Report. The consultation resulted in a number of changes

to the Scoping Report, including changes to the sustainability objectives and questions, new issues for the area being identified, new plans and strategies being analysed in the report, and revised and new monitoring indicators.

Public Participation

The Strategic Environmental Assessment Directive requires early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying Environmental Report before the adoption of the plan or programme or its submission to the legislative procedure.

The Council consulted the public on the SPD and its Sustainability Appraisal Statement. Full details can be found in the Statement of Consultation – Regulation 18(4)(b), available to view on the Council's website. This outlines the main issues raised in the representations received and how they have been addressed in the SPD, which is to be adopted.

Consultation under Regulation 17

The public consultation on the draft SPD and Sustainability Appraisal Statement was carried out over a 6-week period, which was in accordance with Regulation 17 of the Town and Country Planning (Local Development) (England) Regulations 2004 as amended.

There were in total 3 representations received: 1 was in support and 2 objecting to the draft SPD. No representations were received on the Sustainability Appraisal Statement.

The main issues raised include:

- Support from NHS Cambridgeshire - in particular because it highlights the social aspects of health and the importance of social infrastructure in contributing to the mental wellbeing of a community. These are aspects that have often got overlooked in the planning process where usually only physical aspects have been considered. This aspect is further supported in the forthcoming Joint Strategic Needs Assessment (JSNA) on New Communities (2010) which contains a section on the social environment. The executive summary of this is contained in the Phase 4 Cambridgeshire JSNA Summary document that has been recently published.
- Objection to the duplication of guidance and good practice set out in other policy documents, which will add further bureaucracy, cost and delay. PPS4 (Planning for Sustainable Economic Growth) is recent guidance and if health impact was considered to be important it would have been included as an area to address. It would go against the advice of the Killian Pretty review which notes the amount and type of information that has been needed to support planning applications has substantially increased and become more complex.

- A suggested amendment to paragraph 2.10 to make it clear that Environmental Impact Assessment and Health Impact Assessment do not necessarily need to be integrated together in the same document.

The consultation resulted in one change to the SPD, listed in Appendix A.

4. Reasons for choosing the document as adopted in light of other reasonable alternatives.

The Environmental Assessment of Plans and Programmes Regulations 2004 (12) (2) requires environmental reports to examine reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

This statement is required to set out the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.

PPS12 makes clear that full regard should be had to the chain of conformity to avoid duplication of assessment.

The alternative to having an SPD was to have no SPD at all and to carry out "Business As Usual" implementing the adopted Development Control Policies DPD without published detailed guidance. The Health Impact Assessment SPD, once adopted will provide further guidance on the implementation of the Council's adopted policies requiring the submission of a Health Impact Assessment with planning applications for major developments. As such, it is considered more likely to result in the submission of Health Impact Assessment of an appropriate detail and quality than existing policies alone.

5. Monitoring

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

Details of the monitoring measures envisaged are summarised in Appendix 7 of the Final LDF Sustainability Report.

The indicators created in the Sustainability Appraisal Scoping Report, will continue to be monitored annually. They have been utilised as 'significant effect indicators', to be collated in the LDF Annual Monitoring Report. This report includes an analysis of the implications of the results, and should a need arise a review of LDF documents could be triggered by this information.

The South Cambridgeshire Annual Monitoring Report is available to view on the Council's website.

Appendix A – Amendment made to the SPD as a result of the public consultation

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- Amend paragraph 2.10 to read:
"For those development proposals that are already required to submit an Environmental Impact Assessment (EIA) it may make sense to integrate health impacts into the EIA rather than duplicate the assessments as the methodology is very similar and there is a large overlap in the evidence gathered and used in both assessments. The Council's preferred approach is for Health Impact Assessments to be integrated with other similar assessments to ensure the HIA is wide ranging and has adequately examined all the potential health impacts of a development. It also makes it easier to cross reference the impacts helping to ensure the HIA is comprehensive. At the outset it needs to be made clear that environmental impacts are not health impacts. When carrying out the screening and scoping stages for both the HIA and the EIA, it is important to be ensure that:..."