

Bedford Development Framework

**BEDFORD TOWN CENTRE AREA ACTION
PLAN**

ADOPTION SUSTAINABILITY STATEMENT

Bedford Borough Council

October 2008

The Bedford Town Centre Area Action Plan was adopted by the Council as a development plan document on 8th October 2008. *The Environmental Assessment of Plans and Programmes Regulations 2004* (SI.1633) requires the Council to prepare a statement concerning –

- how environmental considerations have been integrated into the document
- how the environmental report has been taken into account
- how opinions expressed in response to public consultation have been taken into account
- the reasons for choosing the document as adopted in the light of the other reasonable alternatives dealt with
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the document.

This statement has been broadened to cover the other sustainability considerations addressed in the Council's sustainability appraisal of the Plan as well as environmental issues. These matters are considered below.

The integration of sustainability considerations and how the sustainability appraisal report has been taken into account

Sustainability appraisal has been built-in to the process of preparing of the Bedford Town Centre Area Action Plan in accordance with *The Town and Country Planning (Local Development)(England) Regulations 2004* (SI.2204). The consideration of sustainability effects followed the Government's guidance (*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*, ODPM 2005) and included specific consideration of environmental effects. As a result, during the preparation of the Bedford Town Centre Area Action Plan appraisals have been carried out at various stages in relation to its overall sustainability effects and recommendations were made to the authors. These recommendations were taken into account when writing the Bedford Town Centre Area Action Plan. A sustainability appraisal report of the Bedford Town Centre Area Action Plan as submitted to the Secretary of State for examination in July 2006 has been published which concluded that the policies of the Bedford Town Centre Area Action Plan were mostly sustainable. Any negative effects of individual policies would be mitigated by other policies in the Plan.

The account taken of opinions expressed in response to public consultation

A *Scoping Report* was prepared to decide the scope and level of detail to be contained in the sustainability appraisal. The report set out baseline information as well as the draft objectives and indicators that would be used in carrying out the appraisal. Consultation was undertaken with the organisations specified in the Environmental Assessment Regulations and other relevant bodies. Views were sought on whether all the relevant sustainability issues were identified and whether the proposed sustainability objectives and indicators were sufficiently comprehensive. The responses received are summarised in the sustainability appraisal report and, as a result, a number of changes were incorporated into the next stage of the appraisal process.

The next stage was the publication of an *Interim Report* which set out similar information to that contained in the *Scoping Report* together with the results of the appraisal of policy options for the Bedford Town Centre Area Action Plan. Consultation was undertaken on the *Interim Report* with the consultation bodies specified in the Environmental Assessment Regulations, with the specific consultation bodies specified in the Local Development Regulations and the general public. The responses received are summarised in the sustainability appraisal report and, as a result, a number of changes were incorporated into the next stage of the appraisal process. The result of consultation on policy options for the Bedford Town Centre Area Action Plan is set out in the *Statement of Consultation* (July 2006).

The third stage was the preparation of the *Final Sustainability Report*. Public consultation was undertaken as previously on the *Final Sustainability Report* which appraised the Bedford Town Centre Area Action Plan Preferred Option. Only two responses were received to the consultation (summarised in the sustainability appraisal report) and minor changes were made. The result of consultation on the Bedford Town Centre Area Action Plan Preferred Option is set out in the *Statement of Consultation* (July 2006).

A *Revised Sustainability Report* was produced to reflect the amendments made to the draft Bedford Town Centre Area Action Plan in producing the version of the Plan submitted to the Secretary of State for examination. This *Revised Sustainability Report* is the environmental report for the purposes of the Environmental Assessment Regulations and the sustainability appraisal report for the purposes of the Local Development Regulations.

The consideration of reasonable alternatives

A number of options were considered in the process of preparing the Bedford Town Centre Area Action Plan. These are fully described in the document *Alternatives Considered in Preparing the Plan* which was produced in June 2006. All the reasonable options were included in the Preferred Option Plan and were appraised in the *Interim Report*. The results are contained in the sustainability appraisal report.

In addition to appraising options for policies in the Bedford Town Centre Area Action Plan, a 'do-nothing' alternative was appraised, in other words, an assessment of the effect of not producing the Bedford Town Centre Area Action Plan. The results of the sustainability appraisal of the 'do nothing' option showed that the option of not producing the Plan would have mostly negative and some uncertain effects. Not producing the Plan could result in one short-term positive effect however, as it would mean that currently vacant sites are not developed, which would be likely to conserve (if not enhance) biodiversity. Longer term such sites would be likely to see some form of development in any case, leading to negative effects on biodiversity without the Plan to ameliorate them. To make the negative and uncertain effects more positive, special consideration would have to be given to enhancing the town centre. The most effective means of doing this is through the preparation of an overall town centre plan. Therefore preparation of the Bedford Town

Centre Area Action Plan was considered to be more sustainable than a 'do-nothing' alternative.

The monitoring of significant effects

It is intended that sustainability monitoring and the monitoring of significant environmental effects will be incorporated into existing monitoring arrangements and be included in the Annual Monitoring Report. Where monitoring identifies unforeseen adverse effects it will be appropriate to consider in the Annual Monitoring Report whether remedial action is needed. This could include reviewing the Plan or making recommendations on the implementation of specific policies.

Changes to the Plan following examination

The sustainability appraisal report that has been prepared is of the Bedford Town Centre Area Action Plan as submitted to the Secretary of State in July 2006 for examination. Following the public examination, the Inspector prepared a binding report which set out a number of amendments to be made to the Plan. None of the amendments affects the sustainability assessment of the Plan. These amendments have been incorporated into the adopted version of the Bedford Town Centre Area Action Plan.