Strategic Environmental Assessment/ Sustainability Appraisal Statement

Annex 7

Prepared by Kent County Council

February 2007

TABLE OF CONTENTS

1. INTRODUCTION

1.1 SEA / SA for the Kent Joint Municipal Waste Management Strategy

1.1.1 The Joint Municipal Waste Management Strategy ('the Strategy') has been developed by the Kent Waste Partnership (KWP[1]) with support from Environmental Resources Management Ltd (ERM). The Strategy sets out the Council's policies and objectives for the management of Kent's municipal solid waste for the next twenty years. The development of the Strategy was steered by the KWP and input from other key stakeholders was achieved through the Kent Waste Open Forum.

1.1.2 The Strategy has been subject to a Strategic Environmental Assessment (SEA), carried out in conjunction with the Sustainability Appraisal (SA) of the Waste Development Framework. The SEA requires certain plans and programmes to undergo a formal environmental assessment. The SA involves the identification and evaluation of the Strategy's impact on economic, social and environmental objectives – the three dimensions of sustainable development. Annex 1 provides a summary of the SEA / SA methodology applied to the Strategy and the various written outputs from the process.

1.2 Taking the SEA / SA Findings into Account

1.2.1 Under the SEA Directive, the findings of the environmental assessment - as documented in the 'environmental report' – and the responses to the consultation on the plan or programme must be taken into account by decision-makers during the preparation of the plan or programme in question.

Under the SEA Directive:

"The environmental report...[and] the opinions expressed [through the consultation]... shall be taken into account during the preparation of the plan or programme and before its adoption..."

(Article 8)

1.2.2 In order to demonstrate that the findings of assessment and consultation have indeed been taken into account, plan and programme makers are required to produce a statement summarising precisely how environmental considerations and consultation responses are reflected in the final version of the plan or programme.

1.3 SEA / SA Statement

1.3.1 Once a plan or programme has been adopted, the SEA Directive requires those responsible for preparing it to provide key environmental bodies[2] and the public with information on how environmental considerations and consultation responses are reflected in the plan or programme and how its implementation will be monitored in the future.

[1] The KWP partner local authorities are the districts of Ashford, Canterbury, Dartford, Dover, Gravesham, Maidstone, Sevenoaks, Shepway, Swale, Thanet, Tonbridge & Malling, Tunbridge Wells and Kent County Council.
[2] The Countryside Agency, English Heritage, English Nature, and the Environment Agency.

Plan or programme proponents should ensure that, when a plan or programme is adopted, the Environmental Consultation Bodies and the public *"are informed and the following items are made available to those so informed:*

(a) the plan or programme as adopted;

(b) a statement summarising how environmental considerations have been integrated into the plan or programme...[including] the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and

(c) the measures decided concerning monitoring [of the plan]"

(Annex 9(1))

1.3.2 In light of this requirement, the Council has prepared this statement, which sets out the following information:

- Section 2 – the non-technical summary from the SA Report on the Strategy – this sets out the principal findings of the SA and recommendations for changes to the Strategy.
- Section 3 – how the findings of the SA have been taken into account in finalising the Strategy, including the reasons for choosing various alternatives.
- Section 4 – how the responses to the consultation were taken into account in finalising the Strategy.
- Section 5 – how the implementation of the Strategy will be monitored in the future.

2 SA FINDINGS

The non-technical summary from the SA Report (May 2006) on the Strategy is reproduced below.

2.1 Introduction

2.1.1 All local authorities should have in place a strategy for managing their municipal waste. With this in mind, the Kent Waste Partnership (KWP) has taken the lead in the development of a new **Joint Municipal Waste Management Strategy** (JMWMS) for the County. This will replace the existing Kent Household Waste Strategy which was adopted by the KWP and published in May 2003.

2.1.2 The KWP partner local authorities are the Districts of Ashford, Canterbury, Dartford, Dover, Gravesham, Maidstone, Sevenoaks, Shepway, Swale, Thanet, Tonbridge and Malling, Tunbridge Wells and Kent County Council. The KWP also includes representatives from the Environment Agency and the Association of Parish Councils.

2.1.3 The JMWMS ('the Strategy') covers the waste that the partner authorities are responsible for collecting, treating and disposing of. This includes waste collected from households, street sweepings, trade waste collections (where appropriate), and waste collected at Household Waste Recycling Centres (HWRCs). These waste streams are collectively referred to as **municipal solid waste** (MSW)[3]. The purpose of the Strategy is to set how the KWP's constituent authorities intend to manage municipal solid waste arisings over the next 20 years.

2.1.4 Developing a strategy to manage Kent's MSW is essential since recent years have witnessed an annual increase in waste arisings. In 2005 / 06, Kent residents produced approximately 811,000 tonnes of MSW – more than 1.4 tonnes per household. Although the Strategy assumes that waste growth per household will slow to zero, *overall* levels of MSW will grow in Kent due to the significant predicted growth in household numbers (particularly in the growth areas of Ashford and Kent Thameside).

2.1.5 The Strategy itself comprises a **Headline Strategy** together with a variety of supporting annexes including a baseline report on municipal waste in Kent and a series of documents setting out potential options for managing municipal waste. The Headline Strategy contains 20 policies addressing a range of issues including resource management; partnership working; education and engagement; waste minimisation and re-use; recycling and composting; and residual waste management services. Importantly, the Headline Strategy will be supported by a set of detailed **action plans** for implementing the policies. Further information on the Strategy is available on the Council's website[4].

2.2 Sustainability Appraisal

2.2.1 Scott Wilson and Levett-Therivel have been commissioned to support Kent County Council ('the Council') in undertaking the **Sustainability Appraisal** (SA) of the JMWMS (as well as the Kent Minerals and Waste Development Framework and the Local Transport Plan for Kent 2006 – 11).

2.2.2 The Department for Environment, Food and Rural Affairs (DEFRA) suggests that SA is undertaken for municipal waste management strategies. SA involves the identification and evaluation of the Strategy's impacts on economic, social and

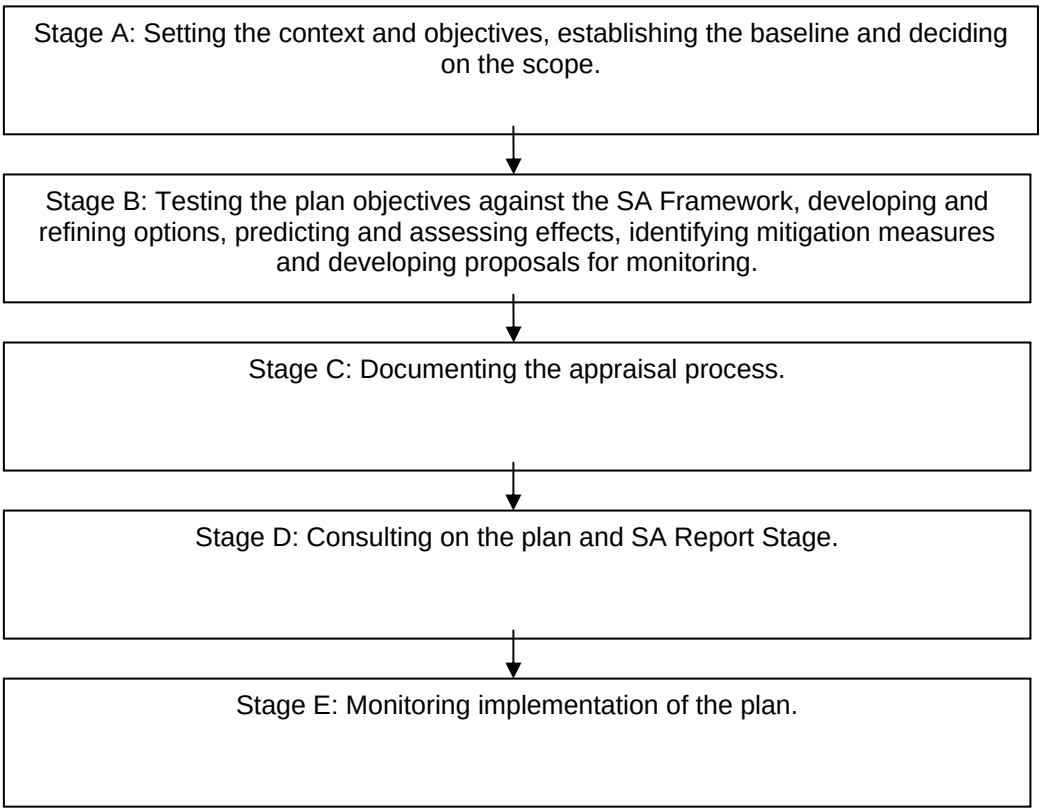
[3] The Strategy does not address waste generated by businesses in Kent except where authorities arrange for its collection.

[4] See: www.kent.gov.uk/kwp

environmental objectives – the three dimensions of **sustainable development**. The SA process incorporates the requirements of a new European law on the environmental assessment of plans (referred to as the 'Strategic Environmental Assessment Directive').

2.2.3 The SA process (incorporating SEA) – involves five key stages – see Figure 1.

Figure 1: Five stage approach to SA



2.2.4 Stage A in the SA process involved establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which the Strategy could be appraised – together with an evidence base to inform the appraisal. The framework and evidence base were documented in a **Scoping Report** which is available on the Council's website[5]. This report also provided the framework and evidence base for the appraisal of the Kent Minerals and Waste Development Framework (MWDF) and the Local Transport Plan for Kent 2006 – 11 (LTP).

2.2.5 Stage B in the process focused primarily on appraising, firstly, the various waste management **options** available to the KWP and, secondly, the 20 **policies** for waste management contained in the Headline Strategy. Following the appraisal, a series of recommendations were made for strengthening the Strategy's sustainability performance.

2.2.6 This report – Stage C in the SA process – documents the appraisal of the options and policies as well as the recommendations. The draft Strategy - together with this report - is subject to consultation under Stage D. This report also includes recommendations for monitoring the Strategy as required under Stage E.

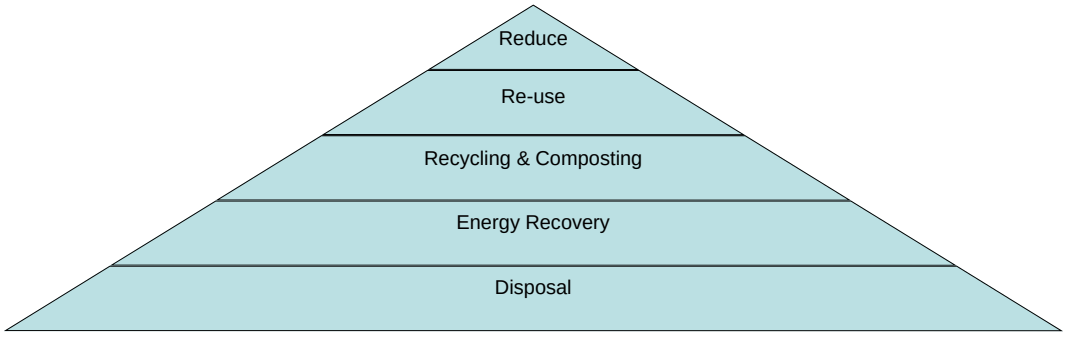
[5] Scoping Report available at: http://www.kent.gov.uk/publications/environment/scoping-report04-05.htm

2.3 Options for Managing MSW

2.3.1 A key part of the SA process was the appraisal of different **options** for managing Kent's MSW. The choice between these options will provide the foundations for the Strategy's detailed action plans.

2.3.2 The KWP commissioned ERM to assist in developing and appraising various options. Options were generated for key levels in the **waste hierarchy** – for reduction and re-use; recycling and composting; and energy recovery and disposal (see Figure 2).

Figure 2: The waste hierarchy



2.4 Options for Waste Reduction and Re-use

2.4.1 The KWP generated a series of options for **waste reduction** – or prevention – and **re-use** – see Table 1. These options comprised different combinations of various initiatives currently available to promote waste prevention and re-use. All of these approaches are focused on the reduction of waste with the exception of the last one – support for re-use of items, local waste exchanges and charity shops – which is a re-use measure.

Table 1: Options for waste reduction and re-use

Option 1	Do nothing (do not further advance the various waste prevention and re-use initiatives currently in place)
Option 2	Implement programmes that do not require any capital expenditure: • trade waste diversion; • re-usable nappies; • waste aware (SMART) shopping; and • unwanted mail.
Option 3	Implement programmes that divert more than 2.5% of MSW arisings: • home composting; • waste aware (SMART) shopping; and • re-use – unwanted goods
Option 4	Implement all programmes offered identified by the KWP – home composting, waste aware (SMART) shopping, unwanted mail, re-usable nappies, trade waste diversion, product service businesses, and re-use – unwanted goods.

2.4.2 The appraisal concluded that, in general, the options that promised the greatest reduction in MSW arisings – Options 3 and 4 – performed best in terms of sustainability. Through reducing waste and increasing its re-use, they are likely to have positive implications for air quality, water quality, climate change, biodiversity, landscape and health. This is because Options 3 and 4 could lead to a reduction in MSW arisings such that there would be a corresponding reduction in the need for waste treatment facilities and the impacts associated with these.

2.4.3 Option 1 is the least compatible with sustainability principles since it essentially represents business-as-usual and will result in relatively little reduction in MSW arisings. Option 2 focuses on initiatives that do not require any capital expenditure (and relatively little action on the part of Kent's local authorities) and will result in comparatively less waste reduction than Options 3 and 4.

2.4.4 It should be noted that the difference between the performances of the options hinges on whether or not they actually lead to an overall *reduction* in MSW arisings. This 'tipping point' is the point at which an option is effective in reducing waste despite year-on-year increases in waste arisings.

2.4.5 It is acknowledged that some scepticism exists as to the effectiveness of waste prevention and re-use schemes. Nevertheless, work done on behalf of the KWP indicates that reductions in MSW arisings can be made, particularly under Options 3 and 4. However, the KWP's background work indicates that any waste reduction achieved by 2019 / 20 is likely to be limited (probably more so in light of planned housing growth for Kent). Achieving real reductions in waste arisings may require more radical measures (e.g. charging households per unit of waste produced[6]).

2.4.6 **Recommendation**: The KWP should pursue Options 3 or 4 (or a combination of these) since these options have the potential to reduce overall MSW arisings. This is crucial considering the recent year on year increases in MSW in Kent and the planned growth in the number of households.

2.5 Options for Recycling and Composting

2.5.1 The combined household recycling and composting rate for Kent, including material recycled at HWRCs, is currently around 29%. In light of this, the KWP generated a series of options for recycling and composting waste – see Table 2.

Table 2: Options for recycling and composting

Option A	Raise participation and capture rates of current recycling collections to 80%
Option B	Increase coverage of recycling and composting collections to 100% and increase participation and capture to 80%
Option C	Expand glass collections to all households
Option D	Introduce compostable kitchen waste collections to all households
Option E	Expand garden waste collections to all relevant households
Option F	Expand the current cardboard collections to all households
Option G	Collect dense and film plastics from 100% of households
Option H	Collect tins and cans from 100% of households
Option I	Add kitchen and cardboard to current garden waste collections
Option J	Collect commingled plastics and tins and cans from 100% of households

[6] As recently recommended by the Policy Studies Institute (2006). *A Green Living Initiative* available at: http://www.psi.org.uk/pdf/2006/GreenLivingInitiative.pdf (NB this is not currently within the legal remit of authorities)

Option K	Increase recycling at bring sites by 15%
Option L	Increase recycling at bring sites by 20%
Option M	Expand the range of bring sites to include dense and film plastics
Option N	Increase recycling at the Household Waste Recycling Centres (HWRCs) to 60%
Option O	Increase recycling at the HWRCs to 75%

2.5.2 The appraisal concluded that Kent should maximise the coverage, participation and capture of recycling and composting collections as well as increasing recycling at bring sites and HWRC's. The Strategy should also make every effort to maximise the level of plastic and non-ferrous metal recycling within the County (therefore avoiding this being transported elsewhere).

2.5.3 **Recommendation**: It is recommended that Kent maximise the coverage, participation and capture of recycling and composting collections as well as increasing recycling at bring sites and HWRCs. The Strategy should also make every effort to ensure that such increases maximise the level of plastic and non-ferrous metal recycling within the County.

2.6 Options for Energy Recovery and Disposal

2.6.1 Beyond recycling and composting, **recovery** is the capture of value from residual waste, usually in the form of energy. The Allington Waste Management Facility near Maidstone will include an Energy from Waste (EfW) plant - due to come on stream in late 2006 – and this will generate approximately 40 megawatt hours of electricity. Waste **disposal** generally involves landfilling residual waste and Kent currently sends approximately 552,000 tonnes of MSW per year to landfill. The amount of waste permitted to go to landfill is increasingly restricted under the EU Landfill Directive[7].

2.6.2 The KWP generated a series of options for energy recovery from waste and waste disposal – see Table 3. These centre on different waste treatment facilities and provide an indicative route to meeting the County's allowances under the Landfill and Allowance and Trading Scheme (LATS)[8].

Table 3: Options for energy recovery from waste and waste disposal

Option 1	New Energy from Waste (EfW) facility in East Kent
Option 2	Expand current contracted capacity at Allington EfW
Option 3	Mechanical Biological Treatment (MBT) plant in East Kent providing Refuse Derived Fuel (RDF) to Allington EfW
Option 4	MBT plant in East Kent stabilising material to be sent to landfill
Option 5	Autoclave in East Kent with fluff to Allington EfW
Option 6	Gasification plant in East Kent
Option 7	Anaerobic Digestion facility in East Kent
Option 8	In-vessel composting facilities across Kent for Garden and Kitchen Waste

[7] The Landfill Directive sets demanding targets to reduce the amount of biodegradable municipal landfilled.

[8] The Landfill Allowances Trading Scheme (LATS) went live on 1st April 2005 and is designed to help English authorities meet the targets in the Landfill Directive. The allowances will convey the right for a waste disposal authority to landfill a certain amount of biodegradable municipal waste in a specified scheme year. Each waste disposal authority will be able to determine how to use its allocation of allowances in the most effective way. It will be able to trade allowances with other authorities; save them for future years (bank) or use some of its future allowances in advance (borrow).

2.6.3 The appraisal concluded that Kent should maximise the level of recycling and composting, particularly of plastics and metals, before any subsequent residual waste processing is carried out.

2.6.4 The technical appraisal work carried out by ERM, suggests that those options which generate energy perform better than those which do not. Of those which do, anaerobic digestion[9] (Option 7) is the only technology that generates renewable energy (under current definitions). It also operates further up the waste hierarchy than the other technologies and is therefore considered marginally more sustainable than the other energy generating technologies. However, it should be noted that the relatively strong performance of Option 7 rests on the fact that plastics and metals are removed (and recycled) prior to the digestion process.

2.6.5 **Recommendation**: It is recommended that Kent maximise the level of recycling and composting, particularly of plastics and metals, before any subsequent residual processing is carried out. The technical appraisal carried out by ERM suggests that although there is little difference between the options in terms of sustainability, those options which recover energy from waste perform better than those which do not. Of those that do, anaerobic digestion is the only option that generates renewable energy (under current definitions) and operates further up the waste hierarchy than the others. It is therefore marginally more compatible with sustainable development objectives than the other energy generating technologies.

2.7 Other Recommendations from the Options Appraisal

2.7.1 Addressing the issues of waste reduction and re-use and recycling and composting on a separate basis (as required by Government guidance) can lead to potential incompatibilities. For example Option 3 for the reduction and reuse of waste emphasises that home composting can divert more than 2.5% of MSW arisings (and importantly promote a shift in household behaviour). Such a reduction could potentially be undermined by options for recycling and composting that lead to waste being collected from households and treated elsewhere. These options include the introduction of compostable kitchen waste collections to all households (Option D) and the expansion of garden waste collections to all relevant households (Option E).

2.7.2 **Recommendation**: The Strategy should elaborate on the relationship between home composting as a waste reduction measure and the collection of kitchen and garden waste as a recycling and composting measure. If necessary, the Strategy should include a policy or measures to ensure that the collection of kitchen and garden waste does not undermine efforts to promote home composting.

2.8 Headline Strategy Policies

2.8.1 A key part of the SA process was the appraisal of the 20 policies for managing MSW contained in the Headline Strategy – see Table 4. The detailed action plans will set out how these policies will be implemented.

Table 4: Headline Strategy policies

Policies for resource management	
Policy 1	The KWP will encourage the conservation of resources through the use in Kent of materials and energy recovered from wastes produced in Kent. It will aim to influence other areas of public policy and service delivery to support this agenda

[9] Anaerobic digestion is an alternative to landfilling of organic wastes. It is a naturally occurring process of decomposition and decay, by which organic matter is broken down to its simpler chemicals components under anaerobic conditions (without oxygen). The process produces biogas and digestate.

Policies for partnership	
Policy 2	To deliver the Strategy, the County, District and Borough Councils will work towards a new Kent Waste Partnership with a formal joint committee structure; they will actively seek the views of stakeholders, and their contribution to achieving the Strategy's objectives
Policies for education and engagement	
Policy 3	All stakeholders, including elected Members, will be kept informed and consulted on waste management issues affecting Strategy implementation
Policy 4	Targeted and co-ordinated campaigns will be run across Kent to inform, educate and to work towards changing behaviour of householders
Policy 5	The authorities will work jointly and individually to encourage the Community and Social Enterprise Sector to reach its full potential in delivering cost-effective and sustainable waste management services
Policies for waste minimisation and re-use	
Policy 6	Waste minimisation and re-use will be prioritised and the KWP will seek through its wider policy aims to break the link between waste production and economic growth
Policy 7	The KWP will lobby for measures to combat waste growth in areas such as product design and producer responsibility that are most effectively pursued at the national and international levels
Policies for recycling and composting	
Policy 8	The KWP will achieve a level of 40% recycling and composting household waste by 2012 / 13
Policy 9	The KWP authorities will work together to develop, to maintain and to improve schemes that secure the best recycling and composting performance for Kent as a whole
Policy 10	The KWP will secure higher rates of performance from existing services through education and awareness-raising
Policy 11	The KWP will strive to make waste and recycling accessible and easy to use for all householders, across all housing types and sectors of the community
Policy 12	The KWP will work to secure additional in-vessel composting capacity in the County to enable the authorities in the east of Kent to provide an efficient and cost-effective service for managing compostable wastes
Policy 13	The recycling and composting performance of HWRCs will be improved, reaching 60% by 2012 / 13, while maintaining high standards of customer service
Policies for residual waste management services	
Recovery	
Policy 14	A timely procurement programme will be implemented to provide sufficient capacity for Kent to continue to meet its statutory targets for the diversion of biodegradable municipal waste
Policy 15	The procurement programme for additional capacity will take account of the opportunities for co-management with other waste streams, but will discourage facilities of a scale that will attract imports of waste to the County.
Policy 16	Procurement of additional capacity will keep technical options open and flexible in terms of the number and scale of facilities to be provided but will need to emphasise deliverability

Policy 17	Kent County Council will take a pragmatic approach to trading landfill allowances, being willing to trade, but not reliant on trading for compliance or essential income.
Disposal	
Policy 18	Kent will procure landfill capacity to meet the need for the disposal of residual waste for which recovery capacity is not contracted
Policy 19	Where it is cost effective, Kent will exceed its statutory targets for diversion of biodegradable municipal waste from landfill in order to preserve landfill void space in the County
Waste Transfer Facilities	
Policy 20	The transfer station network will be improved across Kent to promote the efficient transport of wastes for treatment, recovery and disposal.

2.8.2 The appraisal concluded that the Strategy's performance in relation to the many of the environmental aspects of sustainability (e.g. reducing flood risk, protecting and enhancing biodiversity, the countryside and the historic environment) depended on the location, scale and characteristics of new waste management facilities.

2.8.3 **Recommendation**: The Strategy should adopt a clear requirement that waste facilities should not have an adverse impact on the natural or built environment and should contribute to environmental enhancement wherever possible. This commitment could be expressed through an additional policy on environmental sustainability in the Headline Strategy. More broadly, this policy could also include an explicit commitment to promoting sustainable development through the Strategy.

2.8.4 The appraisal emphasised the adverse impacts associated with the transportation of waste around Kent (e.g. pollution, noise, disruption to local amenity etc.). With this in mind the appraisal highlighted the need to promote waste transportation via more sustainable modes (rail, river and sea as opposed to road) as well as the proximity principle with respect to local recycling centres (the proximity principle holds that the best place to deal with something is as close to that something as possible).

2.8.5 **Recommendation**: The Strategy should explicitly support the transportation of waste by more sustainable modes (rail, river and sea as opposed to road) as well as the location of recycling facilities within walking distance of residential areas in order to reduce the need to travel by car). With this in mind, the KWP should clarify the meaning of the term 'accessible' under Policy 11.

2.9 Taking the Strategy Forward

2.9.1 The 20 policies set out in the Headline Strategy will be implemented through a set of detailed action plans to be prepared during mid to late 2006. The completed Strategy including the action plans is set to be adopted in early 2007. In drawing up these action plans, choices will be made between the various options set out above for waste reduction and re-use, recycling and composting and energy recovery and disposal. In order to ensure that sustainability concerns are considered in formulating these action plans, the appraisal findings set out above should be explicitly taken into account. In addition, the KWP could consider undertaking formal SA of the emerging action plans.

2.9.2 **Recommendation**: The KWP should ensure that the findings of this SA are taken into account in formulating the action plans for policy delivery. The KWP should also consider undertaking formal SA of the emerging action plans.

2.10 Summary of Recommendations

2.10.1 The recommendations arising from the appraisal are summarised in Table 5.

Table 5: Summary of recommendations

Options for managing MSW	
Waste reduction and re-use	**Recommendation**: The KWP should pursue Options 3 or 4 (or a combination of these) since these options have the potential to reduce overall MSW arisings. This is crucial considering the recent year on year increases in MSW in Kent and the planned growth in the number of households.
Recycling and composting	**Recommendation**: The KWP should pursue options which maximise the coverage, participation and capture of recycling and composting collections as well as increasing recycling at bring sites and HWRC's. Furthermore, the Strategy should promote the recycling of materials such as plastics and non-ferrous metals within the County.
Energy recovery and disposal	**Recommendation**: It is recommended that Kent maximise the level of recycling and composting, particularly of plastics and metals, before any subsequent residual processing is carried out. The technical appraisal carried out by ERM suggests that although there is little difference between the options in terms of sustainability, those options which recover energy from waste performs better than those which do not. Of those that do, anaerobic digestion is the only option that generates renewable energy (under current definitions) and operates further up the waste hierarchy than the others. It is therefore marginally more compatible with sustainable development objectives than the other energy generating technologies.
Other issues	**Recommendation**: The Strategy should elaborate on the relationship between home composting as a waste reduction measure and the collection of kitchen and garden waste as a recycling and composting measure. If necessary, the Strategy should include a policy or measures to ensure that the collection of kitchen and garden waste does not undermine efforts to promote home composting.
Headline Strategy policies	
Recommendation: The Strategy should adopt a clear requirement that waste facilities should not have an adverse impact on the natural or built environment and should contribute to environmental enhancement wherever possible. This commitment could be expressed through an additional policy on environmental sustainability in the Headline Strategy. More broadly, this policy could also include an explicit commitment to promoting sustainable development through the Strategy.	
Recommendation: The Strategy should explicitly support the transportation of waste by more sustainable modes (rail, river and sea as opposed to road) as well as the location of recycling facilities within walking distance of residential areas in order to reduce the need to travel by car). With this in mind, the KWP should clarify the meaning of the term 'accessible' under Policy 11.	
Taking the Strategy forward	
Recommendation: The KWP should ensure that the findings of this SA are taken into account in formulating the action plans for policy delivery. The KWP should also consider undertaking formal SA of the emerging action plans.	

3 HOW THE SA FINDINGS HAVE BEEN TAKEN INTO ACCOUNT

3.1 Introduction

3.1.1 The Joint Municipal Waste Management Strategy was subject to SA at two key stages during its development:

1. The waste management options available to the KWP were appraised. Decisions on which of these options to pursue helped shape the overall direction and content of the Strategy.

2. The 20 policies for the management of municipal solid waste contained in the draft Headline Strategy were subject to SA to ensure that they adequately reflected sustainable development principles.

3.1.2 The findings of the options and policies appraisal were documented, along with recommendations, for the KWP to fully consider when taking the Strategy forward.

3.2 Kent Waste Partnership Responses

3.2.1 Final changes to the draft strategy as a result of the SA Report findings and the ERM and KWP responses to these findings are outlined in Tables 6-9.

Table 6: Options Appraisal - SA Findings

SEA / SA recommendation	ERM recommendation	Final change
Waste reduction and re-use. The KWP should pursue Options 3 or 4 (or a combination of these) since these options have the potential to reduce overall MSW arisings. This is crucial considering the recent year on year increases in MSW in Kent and the planned growth in the number of households.	This issue should be addressed in the detailed Waste Minimisation Action Plans produced to implement the Strategy. The KWP authorities should pursue this recommendation in line with individual needs and circumstances.	As ERM recommendation.
Recycling and Composting The KWP should pursue options which maximise the coverage, participation and capture of recycling and composting collections as well as increasing recycling at bring sites and HWRC's. Furthermore, the Strategy should promote the recycling of materials such as plastics and non-ferrous metals within the County	This issue is addressed in policy 10 and 13 of the Strategy. Policy 10: 'The KWP will secure higher rates of performance from existing services through education and awareness-raising'. Policy 13: 'The recycling and composting performance of HWRCs will be improved, reaching 60% by 2012/13, while maintaining high standards of customer service'.	As ERM recommendation.
Energy recovery and disposal	This is reflected in Policy 1:	As ERM recommendation.

It is recommended that Kent maximise the level of recycling and composting, particularly of plastics and metals, before any subsequent residual processing is carried out. The technical appraisal carried out by ERM suggests that although there is little difference between the options in terms of sustainability, those options which recover energy from waste performs better than those which do not. Of those that do, anaerobic digestion is the only option that generates renewable energy (under current definitions) and operates further up the waste hierarchy than the others. It is therefore marginally more compatible with sustainable development objectives than the other energy generating technologies.	Policy 1: 'The KWP will encourage the conservation of resources through the use in Kent of materials and energy recovered from wastes produced in Kent. It will aim to influence other areas of public policy and service delivery to support this agenda'. Anaerobic digestion is the only option that generates renewable energy. A number of the technologies produced energy that can be used.	
Other issues The Strategy should elaborate on the relationship between home composting as a waste reduction measure and the collection of kitchen and garden waste as a recycling and composting measure. If necessary, the Strategy should include a policy or measures to ensure that the collection of kitchen and garden waste does not undermine efforts to promote home composting.	Home composting is promoted as part of the waste minimisation area of the Strategy. There will be increased monitoring of this option from the WRAP-funded research to show the impact of this waste reduction method.	As ERM recommendation.

Table 7: Policies Appraisal - SA Findings

SEA / SA recommendation	ERM recommendation	Final change
The Strategy should adopt a clear requirement that waste facilities should not have an adverse impact on the natural or built environment and should contribute to environmental enhancement wherever possible. This commitment could be expressed through an additional policy on environmental sustainability	This issue does not need to be addressed in the JMWMS. This will be dealt during planning.	As ERM recommendation.

in the Headline Strategy. More broadly, this policy could also include an explicit commitment to promoting sustainable development through the Strategy.		
The Strategy should explicitly support the transportation of waste by more sustainable modes (rail, river and sea as opposed to road) as well as the location of recycling facilities within walking distance of residential areas in order to reduce the need to travel by car). With this in mind, the KWP should clarify the meaning of the term 'accessible' under Policy 11.	This issue does not need to be addressed in the JMWMS. This will be dealt during planning. Sustainable modes of transport will be looked on favourable in the planning arena.	As ERM recommendation.

Table 8: Taking the Strategy Forward – SA findings

SEA / SA recommendation	ERM recommendation	Final change
The KWP should ensure that the findings of this SA are taken into account in formulating the action plans for policy delivery.	The findings of the SA will be taken into account when producing the Strategy Delivery Action Plans.	As ERM recommendation.
The KWP should also consider undertaking formal SA of the emerging action plans.	It is not deemed appropriate to undertaken a formal SA of the Action Plans as these documents are working documents that will not remain static.	As ERM recommendation.

Table 9: Other Suggestions made in the SA Report

SEA / SA recommendation	ERM recommendation	Final change
P38, paragraph 6.2.11 - Home composting could be encouraged in the growth areas of Ashford and Kent Thameside where considerable housing development will take place.	The findings of the SA will be taken into account when producing the Growth Areas Action Plans.	As ERM recommendation.
P41, paragraph 6.3.8 - Options make no mention of local community recycling and composting schemes which could achieve a high rate of recycling and composting, reduce transportation requirements and play a part in achieving a reduction in waste arisings through changes in behaviour.	This is addressed in Policy 5: Policy 5: 'The authorities will work jointly and individually to encourage the Community and Social Enterprise Sector to reach its full potential in delivering cost-effective and sustainable waste management services'	As ERM recommendation.

4 COMMENTARY ON DECISION MAKING AND RESPONSES TO CONSULTATION

4.1 Introduction

4.1.1 Under the SEA Directive, this statement should set out 'how environmental considerations have been integrated into the plan or programme' and how the 'opinions expressed' as a result of consultation on the draft plan or programme and the accompanying SA report have been taken into account. Three factors therefore need to be explicitly taken into account in finalising the Strategy:

1. The findings of the SA;
2. The findings of the consultation on the draft Strategy;
3. The findings of the consultation on the draft SA Report.

4.1.2 In relation to the SA findings section 3.2 details changes to the Strategy accepted by the KWP in light of the SA report

4.1.3 In relation to the consultation findings on the Strategy, section 4.2 provides a commentary on the evolution of the Strategy, including changes made between the draft and final Strategy and the way in which consultation has led to changes in the plan.

4.1.4 In relation to comments on the SA Report, Section 4.3 sets out responses to the SA Report and how these have been taken into account in finalising the Strategy. Section 4.4 details how the SA Scoping Report (prepared at the beginning of the SA process) was amended in light of consultation.

4.1.5 It is important to note that the final version of the Strategy reflects the findings of the consultation and the findings of the SA Report.

4.2 Wider Consultation and Changes to the Plan

4.2.1 ERM proposed amendments to the Headline Strategy after the consultation process. These suggested amendments were presented to the Kent Waste Partnership for consideration and agreement on 16th November 2006. Table 10 details the outcomes of the consultation and changes to the final Strategy.

Table 10: Impact of the consultation on the final Strategy

Objective/Policy	Concern Raised	Suggested Amendment	Final Agreed Change
Objective – Delivery of high quality services	It was felt that this objective was vague, and that high quality services should be delivered as a matter of course. A large number of respondents and delegates at the Kent Waste Open Forum thought that waste reduction/minimisation should be included explicitly at this point.	Delivery of high quality services to the people of Kent including an emphasis on waste reduction, recycling and diversion from landfill	As per suggested amendment

Policy 4 – Targeted and co-ordinated campaigns will be run across Kent to inform, to educate and to work towards changing behaviours of householders.	Consultees thought that focusing the policy on changing the behaviour of *householders* may not emphasise sufficiently clearly the fact that campaigns should also target children, students, businesses etc.	Targeted and co-ordinated campaigns will be run across Kent to inform, to educate and to work towards changing behaviours **of residents, consumers and the wider community.**	As per suggested amendment
Policy 7 - The KWP will lobby for measures to combat waste growth in areas such as product design and producer responsibility that are most effectively pursued at the national and international levels.	The issue of reducing the amount of packaging and lobbying Government and supermarkets was raised strongly in the consultation feedback. People were therefore generally supportive of Policy 7. However, it was felt that 'packaging' should be mentioned explicitly to stress the need for action to be taken specifically on this component of the municipal waste stream.	The KWP will lobby for measures to combat waste growth in areas such as product design and producer responsibility, **with a particular emphasis on packaging,** which is most effectively pursued at the national and international levels.	The KWP will lobby for measures to combat waste growth in areas such **as product design, packaging and producer responsibility issues,** which are most effectively pursued at the national and international levels.
Policy 8 - The KWP will achieve a level of 40% recycling and composting of household waste by 2012/13	The majority of responses thought that this policy and target was not ambitious and not best practice. A number of responses suggested higher levels of 50%, 60% and 75% recycling & composting.	Option 1: The KWP will achieve **a minimum of** 40% recycling and composting of household waste by 2012-13 Option 2: The KWP will achieve a level of 40% recycling and composting of household waste by 2012/13 **and seek to exceed this where practicable**	A combination of Option 1 and 2 was accepted: The KWP will achieve **a minimum of** 40% recycling and composting of household waste by 2012-13 **and seek to exceed this where practicable**
Policy 12 – The KWP will work to secure composting capacity including in-vessel in the County to enable the authorities in the East of Kent to provide an efficient and cost-effective service for	Kent County Council suggests a change to the wording of Policy 12 to "*The KWP will work to secure composting capacity* ***such as in-vessel*** *in the County*."	The KWP will work to secure **additional composting capacity** in the County to enable the authorities in the east of Kent to provide an efficient	It was decided that the suggested amendment affected the clarity of the policy. The original wording remains.

managing compostable wastes.		and cost-effective service for managing compostable wastes.	
Policy 13 – The recycling and composting performance of HWRCs will be improved, reaching 60% by 2012/13, while maintaining high standards of customer service.	No real detail given, just a suggestion for improvement.	The recycling and composting performance of HWRCs will be improved, reaching a **minimum of** 60% by 2012/13, while maintaining high standards of customer service	It was felt that the current policy wording was appropriate and the percentage rate was achievable rather than purely inspirational. The original wording was retained.

4.3 Responses to the SA Report

4.3.1 A number of comments were made on the draft Strategy during the consultation period. No specific comments were made on the Sustainability Appraisal Report. No changes were made to the SA Report.

4.4 Consultation at the Scoping Stage

4.4.1 The SEA/SA process comprises of five stages (A-E) (see Appendix A). Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which the plan in question can be assessed – together with the evidence base that will help inform the appraisal.

4.4.2 Stage A for the SEA/SA of the Strategy was documented in a Scoping Report and a Context Review Report. These reports were subject to consultation with the four designated Environmental Consultation Bodies and other organisations for a period of five weeks. It should be noted that the Reports also applied to the Kent Minerals and Waste Development Framework and the Local Transport Plan for Kent. None of the consultation responses referred to the JMWMS. Table 11 documents the comments made.

Table 11: Amendments to the Scoping Report and Context Review Report in response to consultation

Alterations	Document	Source
Add: CAMS - Darent CAMS CAMS - North Kent CAMS CAMS - Stour CAMS CAMS - Medway CAMS (NB CAMS - Catchment Abstraction Management Strategy)	Context Review	Environment Agency
Add: CFMP - Medway CFMP - Rother (NB CFMP - Catchment Flood Management Plan)	Context Review	Environment Agency
Add: Making Space for Water	Context Review	Environment Agency
Add:	Context Review	Environment Agency

Water Framework Directive - Implications and River Basin Management Plans (RBMPS)		
Imperative that impact of mineral workings on hydrology and quality is understood and managed. Encouragement to locate in areas of low groundwater vulnerability	Context Review / Scoping Report - Key Messages - MWDF	Environment Agency
Change Objective 4 *To maintain and improve the quality of Kent's rivers and coasts, and to achieve sustainable water resource management.*	Scoping Report	Environment Agency
Add: Reduction in area of designated and locally important nature conservation sites as a result of development	Scoping Report - Baseline Review Data gaps (under investigation)	English Nature
Add: Area designated as SCNI and LNR	Scoping Report - Baseline Review Data gaps (under investigation)	English Nature
Add: Achievement of Kent BAP targets	Scoping Report - Baseline Report New Kent BAP targets to be added	English Nature
Add: SSSI indicator change to *% of SSSI units in favourable conditions*	Scoping Report - Baseline Review	English Nature
Add: Woodland Grant Scheme Environmental Stewardship	Scoping Report - Baseline Review Data gaps (under investigation)	English Nature
Change Sustainability Problems Declining Marine environment changed to *declining coastal and marine environment.* Flag up coastal squeeze and rising sea levels as further cause	Scoping Report	English Nature

5 Monitoring

5.1 Introduction

5.1.1 The SEA Directive includes a specific requirement for monitoring the significant environmental effects of plans and programmes and the Environmental Report (incorporated into the SA Report) should include a description of the measures envisages for monitoring the plan. The SEA statement should then include details of the measures decided concerning monitoring.

The 'Environmental Report' required under the SEA Directive should include:

"a description of the measures envisaged concerning monitoring in accordance with Article 10"

Annex 1(i)

"Member States shall monitor the significant environmental effects of the implementation of plans and programmes..."

(Article 10(1))

5.1.2 Monitoring allows the significant environmental and sustainability effects of the Strategy's implementation to be identified and dealt with early on. It helps to assess the actual effects of the Strategy against those predicted in the SA and can provide baseline information for future plans. Table 12 sets out the significant impacts identified through the appraisal process and the potential indicators.

Table 12: Significant environmental and sustainability effects of the Strategy and potential indicators as identified through the SA process

Significant effect	Potential indicators
Flood risk	
The provision of new recycling and composting and energy recovery and disposal facilities will inevitably involve land take with potentially consequent adverse effects on flood risk.	• Flood risk in Kent – Overlay EA flood zone maps with JMWMS derived schemes over a given threshold in scale.
Air quality and climate change	
Impacts on air quality and climate change can arise from new recycling and composting and energy recovery and disposal facilities as well as associated transportation. They also arise from extraction and processing of virgin materials that ultimately generates waste.	• Additional levels of waste transportation associated with JMWMS derived schemes • Carbon emissions from waste treatment and disposal
Water quality and water resources	
The provision of new recycling and composting and energy recovery and disposal facilities will inevitably involve land take with potentially consequent adverse effects on water quality in particular.	• Proportion of river length achieving compliance, marginal and significant failure against overall river quality objectives.

Biodiversity	
The provision of new recycling and composting and energy recovery and disposal facilities will inevitably involve land take with potentially consequent adverse effects on biodiversity.	• Net loss of any designated area due to JMWMS derived scheme. • Potential impacts of proposed JMWMS derived scheme on biodiversity. (Information derived from relevant planning application and environmental statement).
Countryside and the historic environment	
The provision of new recycling and composting and energy recovery and disposal facilities will inevitably involve land take with potentially consequent adverse effects on the countryside and the historic environment.	• Net loss of any designated area due to JMWMS derived scheme • Potential impact of proposed JMWMS derived scheme on landscape designations and landscape character (Information derived from relevant planning application and environmental statement).
Efficient use of land and buildings	
The provision of new recycling and composting and energy recovery and disposal facilities will inevitably involve land take which could include greenfield land	• Net loss of greenfield land and / or greenbelt as a result of proposed JMWMS derived scheme. (Information derived from relevant planning application and environmental statement).
Road traffic and sustainable transport	
The provision of new recycling and composting and energy recovery and disposal facilities will involve the transportation of waste – the more demanding recycling and composting options involve greater levels of transportation.	• Additional levels of waste transportation associated with JMWMS derived schemes • Proportion of MSW in Kent transported by rail, river and sea
Waste management	
It is assumed that the degree to which the management of MSW in Kent is driven up the waste hierarchy will be monitored through the various performance indicators.	
Energy efficiency and renewable energy	
The provision of new recycling and composting and energy recovery and disposal facilities will involve energy consumption and could potentially generate renewable energy. Energy will also be used for associated waste transportation. However, the energy necessary to extract and process virgin materials may decline (generally outside of Kent)	• Additional levels of waste transportation associated with JMWMS derived schemes • Renewable energy generated from energy recovery facilities (NB zero if anaerobic digestion is not pursued)
Sustainable production and local products and services	

The role of the Community and Social Enterprise Sector in managing MSW could be significant with impacts on household behaviour, transportation etc.	• Prevalence of community-based MSW management schemes
Health and well-being	
Studies show the total number of emissions to hospital associated with waste technologies to be relatively low (although this is clearly reliant on the correct operation of facilities).	• Failures in operating procedures at JMWMS derived schemes
Economy	
Generally speaking there are limited employment opportunities arising from new waste management facilities and this is not considered a significant issue	N/A

5.1.3 The SEA Directive requires monitoring to identify possible 'unforeseen adverse effects'. To help comply with this requirement, the Council and Consultants will annually update the SA baseline included in the Scoping Report. Table 13 lists the current baseline indicators and a summary of any significant changes in the SA baseline will be included alongside the significant effects indicators listed in Table 12 above.

Table 13: Baseline indicators

SA baseline indicators
Homelessness
Temporary accommodation
Average house prices
Average house price increases
House price to income ratio
Additional provision of affordable housing
Number of unfit dwellings
Homes judged fit to live in
Properties at risk from flooding
Development in a flood plain
Number of days when air pollution is moderate or high
Number of days when air pollution is moderate or high from PM^{10} and ozone
Annual average nitrogen dioxide concentration
CO_2 emissions
Rivers of Good or Fair chemical and biological water quality
Compliance with Bathing Waters Directive
% of SSSIs in favourable condition
Population of wild birds
Extent of UK BAP priority habitats
Area of woodland
Area under Environmentally Sensitive Areas and Countryside Stewardship Schemes, Woodland Grant Schemes and Environmental stewardship
Reduction in area of designated and locally important nature conservation sites as a result of development
Area designated as Site of Nature Conservation (SNCI) and Local Nature Reserve (LNR)
Achievement of Kent BAP Targets
Changes in populations of characteristic and rare species, e.g. protected and UKBAP species
Grade I and II* listed buildings at risk of decay
Access to local green space

Access to the countryside
Proportion of total area that is derelict land and buildings
New homes built on previously developed land
Access to school
Access to further education
Access to work
Access to hospitals
Access to GPs
Access to major centres
Social investment as percentage of GDP
Real changes in the cost of transport
New retail floor space in town centres and out of town
Index of multiple deprivation
Income deprivation – number of people within families dependent on means-tested income support benefits
Proportion of children under 16 who live in low income households
Benefit recipients
Percentage of households in fuel poverty
Number of households with no central heating
Water affordability
Qualifications at age 19
16 year olds with no qualifications
Proportion of 18-19 year olds with Level 2 qualifications (5 GCSEs A8 – C or NVQ equivalent)
Proportion of people qualified to degree level or higher
Proportion of adults with poor literacy and numeracy skills
Learning participation
Percentage of working age population with qualifications to either NVQ Level 1 / equivalent, NVQ Level 3 or 4 or a trade apprenticeship with no formal qualifications
Travel to work
Average daily motor vehicle flows
Traffic congestion
Road traffic
Heavy goods vehicles
Proportion of travel by mode
Leisure trips by mode of transport
Monetary investment in public transport, walking and cycling
Number of people killed or injured on roads in the country
Household waste arisings
Recycling of household waste
Percentage of waste arisings: (1) recycled (2) composted (3) used to recover heat etc. (4) landfilled
Energy use (gas and electricity)
Proportion of energy generated from renewable sources
Energy use by household
Percentage of new build and retrofit homes meeting EcoHomes Very Good standard
Percentage of commercial buildings meeting BREEAM Very Good standard
Per capita consumption (PCC) of water
Average life expectancy
Percentage of people describing their health as good
Long-term illness, health problem or disability which limits people's daily activities or the work they could do

Death rates from circulatory disease, cancer, accidents and suicides
Work fatalities and injury rates; working days lost through illness
Respiratory illness
Participation in sport and cultural activities
Public concern over noise
Health inequalities
Crime – violence against the person (rate per 1000 population)
Crime – burglary from a dwelling (rate per 1000 population)
Crime – theft from a motor vehicle (rate per 1000 population)
Fear of crime
Unemployment rate
Change in total employment over time
Average claimant count rate
Proportion of people of working age in employment
Proportion of people claiming unemployment benefits who have been out of work for more than a year
Proportion of lone parents, long-term ill and disabled people who are economically active
Ethnic minority employment and unemployment
Low pay
Average gross weekly earnings
VAT registered Businesses per 1000 population
Change in total VAT registered business stock
Proportion of businesses in knowledge-driven sectors
Proportion of professional occupations among employed workforce
Proportion of elementary occupations amongst employed workforce
New business formation rate
GVA per capita
Percentage of jobs in the tourism sector
Number of visitors staying overnight and overnight spend

5.1.4 The implementation of the JMWMS will include ongoing assessment of all options and schemes implemented to ensure all sustainability factors have been considered.

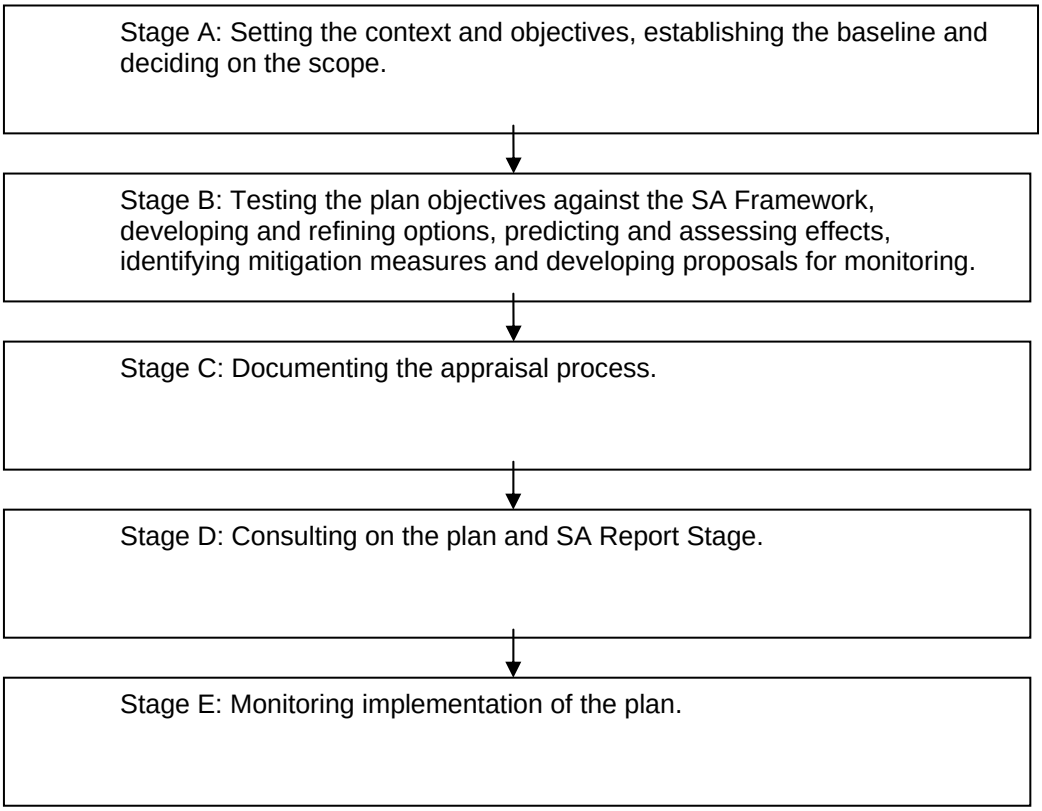
ANNEX 1 – SEA / SA METHODOLOGY AND WRITTEN OUTPUTS

SEA / SA Methodology

The Department for Environment, Food and Rural Affairs (DEFRA) suggests that SA is undertaken for municipal waste management strategies. SA involves the identification and evaluation of the Strategy's impacts on economic, social and environmental objectives – the three dimensions of sustainable development. The SA process incorporates the requirements of a new European law on the environmental assessment of plans (referred to as the 'Strategic Environmental Assessment Directive'). The Kent Waste Partnership has applied SA – incorporating SEA – to the Kent Joint Municipal Waste Management Strategy.

The KWP commissioned consultants Scott Wilson and Levett-Therivel to assist in undertaking the SA of the Strategy. The appraisal process was based on a five stage methodology – see figure 1.

Figure 1: Five stage approach to SA



Stage A in the SA process involved establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which the Strategy could be appraised – together with an evidence base to inform the appraisal. The framework and evidence base were documented in a Scoping Report which was subject to stakeholder consultation. This report also provided the framework and evidence base for the appraisal of the Kent Minerals and Waste Development Framework (MWDF) and the Local Transport Plan for Kent 2006 – 11 (LTP).

Stage B in the process focused primarily on appraising, firstly, the various waste management options available to the KWP and, secondly, the 20 policies for waste management contained in the Headline Strategy. Following the appraisal, a series of recommendations were made for strengthening the Strategy's sustainability performance. Section 3 details how the sustainability considerations were integrated into the Strategy before the consultation process.

Stage C in the SA process involved preparing a final report on the SA of the Strategy. This documented the appraisal process undertaken and the principal appraisal findings.

Stage D of the SA process involved consulting the public on the draft strategy itself as well as the final report on the SA. A number of comments were received and KWP has taken all these comments into account in finalising the Strategy.

Following Stage E, KWP and the consultants prepared this formal statement setting out how the SA process had influenced the content of the Strategy; how responses to consultation had been taken into account; and precisely how the Strategy will be monitored.

Written Outputs

The various written outputs from the SA process are summarised in Figure 2. All of these are available on KCC's website at: http://www.kent.gov.uk/environment/recycling-rubbish-and-waste/managing-waste/waste-strategy.htm.

Figure 2: SA of the Kent Joint Municipal Waste Management Strategy – written outputs

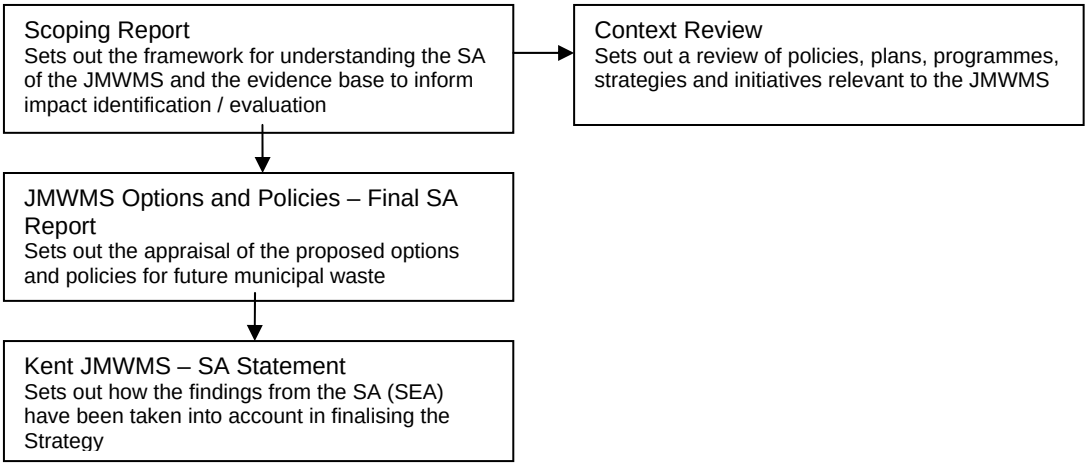


Table 1 sets out the components of the 'environmental report' required under the SEA Directive and in which of the various reports set out above these can be found.

Table 1: SEA Directive requirements checklist

Environmental Report Requirements[10]	**Where can these be found?**
a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	'an outline of the contents [of the JMWMS Strategy]' - **Final SA Report** 'main objectives of the plan or programme' - **Final SA Report** 'relationship with other relevant plans and programmes' - **Context Review** (plus summarised in the Scoping Report and Final SA Report)
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme'	**Scoping Report** (plus summarised in Final SA Report)
c) the environmental characteristics of areas likely to be significantly affected;	**Scoping Report** (plus summarised in Final SA Report)

[10] As listed in Annex I of the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment).

d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	**Scoping Report** (plus summarised in Final SA Report)
e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme' - **Context Review** (plus summarised in the Scoping Report and Final SA Report) 'the way those objectives and any environmental considerations have been taken into account during its preparation' - **Final SA Report** and **SEA / SA Statement**
f) the likely significant effects[11] on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	**Final SA Report**
g) the measures envisages to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	**Final SA Report** and **SEA / SA Statement**
h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	'an outline of the reasons for selecting the alternatives dealt with' - **Final SA Report** and **SEA / SA Statement** 'a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information' - **Final SA Report** (The **Final SA Report** also describes aspects of the methodology)
i) a description of the measures envisages concerning monitoring in accordance with Article 10;	**Final SA Report** and **SEA / SA Statement**
j) a non-technical summary of the information provided under the above headings.	**Final SA Report**

[11] These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.