

Sustainability Appraisal Report

Erith Western Gateway Development Framework

*Final for consultation
February 2011*

Non-technical summary

This is the non-technical summary of the Sustainability Appraisal Report, which documents the assessment of the social, environmental and economic performance of the Erith Western Gateway Development Framework Supplementary Planning Document (SPD) against key sustainability appraisal objectives. The aim of the assessment is to ascertain whether the document is achieving sustainable development. The approach employed in undertaking the sustainability appraisal fulfils requirements for both sustainability appraisal and strategic environmental assessment (SEA), and considers a range of issues including health, well-being, community safety and inclusiveness. This approach is supported by a separate Equalities Impact Assessment and utilises the results from the Habitat Regulations Assessment prepared to support the Proposed Submission Core Strategy, and it seeks to avoid duplication of work by incorporating key objectives relating to health impacts and community safety and wellbeing impacts.

The following section explains what the Erith Western gateway Development Framework Supplementary Planning Document (SPD) is, provides an outline of its content and the methodology used to assess it. This Sustainability Appraisal Report has been published alongside the draft Erith Western Gateway Development Framework SPD, and has been made available for public consultation. For further details on how to give your views, please refer to part 1.4.1 (pg 5) in the main report.

1. What is the Erith Western Gateway Development Framework SPD?

Erith Western Gateway is a collection of sites in the north of Erith town centre and adjacent to the river Thames, totalling some 7.65 hectares. The area incorporates a mixture of land uses in a number of ownerships. It is characterised by buildings of varying ages and designs, interspersed between areas of open space, hard standing and vacant land. The area displays a unique topography resulting from the development and quarrying of land as it slopes down towards the river. The importance of elements of this area in the historic development of the town is recognised through the designation of the riverside, along the line of the High Street, as a conservation area.

The SPD will guide prospective partners on acceptable uses and design expectations, and the phasing of development of the area through a development framework. A vision has been outlined for the future development of the Erith Western Gateway as follows:

Vision for Erith Western Gateway

Erith Western Gateway regeneration will create a new coherent, residential riverside community exploiting Erith's unique setting and integrating well within the existing town, residential areas and facilities. It will provide a mix of housing, new and improved business premises and educational uses set within a framework of new residential streets with an improved public realm. Central to the vision is the rejuvenated Riverside Gardens which will transform Erith's waterfront into a compelling destination and resource for local people and visitors alike. The gardens will be redesigned, transforming them into a truly civic / green space to support the enhanced residential neighbourhood and Erith town centre as well as reinvigorating the garden's relationship to the Thames and its foreshore. This will

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be combined with fully integrated and upgraded flood defences to ensure that they will not dominate the new open space. The reworking of the gardens will reflect the history and character of the area. The redefinition of Erith High Street by new urban buildings will result in the creation of unique waterfront residential opportunities which will form an active edge to the new Riverside Gardens.

A network of new residential streets will be delivered, providing direct, safe and enjoyable pedestrian links between the station, Erith town centre and the riverfront. Simple, uncluttered, robust and attractive streets will be created providing a memorable setting for good buildings, and establishing a distinctive identity. Subtly distinctive residential and mixed use characters will be created within the area, avoiding 'difference for its own sake' and excessive contrasts between adjoining areas and buildings. A medium rise neighbourhood will result, consisting predominantly of houses and apartment buildings, producing a consistent townscape, designed to achieve 'harmonious diversity' and allow for the integration of pre-existing elements. A series of flexible urban blocks will be created capable of adapting to a variety of possible uses as the area matures and society evolves.

This is supported by a series of urban design principles, which have been developed to guide the future development and ensure the delivery of the vision. These principles cover the following broad uses:

- Urban structure, form and massing
- Density and land uses
- Public realm
- Environment and sustainability

2. What is a Sustainability Appraisal / Strategic Environmental Assessment?

A sustainability appraisal attempts to predict and highlight the significant effects of implementing a planning document, and suggests ways to reduce negative effects, create or enhance positive effects, and to make predicted effects more certain. The effects have been considered against a range of sustainability appraisal objectives, which have been developed with reference to a social environmental and economic baseline and the likely future situation from identified trends.

Figure (i) overleaf provides an overview of the key stages of the sustainability appraisal process, which are based on government guidance on sustainability appraisal (ODPM, 2005). The Scoping Report for the sustainability appraisal of the Erith Western Gateway Development Framework SPD (which reflected the completion of Stage A) was subject to consultation with the statutory sustainability appraisal / strategic environmental assessment consultees in November 2010. Responses to that document have been reflected in this Sustainability Appraisal Report. In addition, the baseline information consulted upon has been continuously updated over time to retain its value, and the evaluation of policies, plans and programmes was also reviewed if necessary to reflect changes in the legislative framework.

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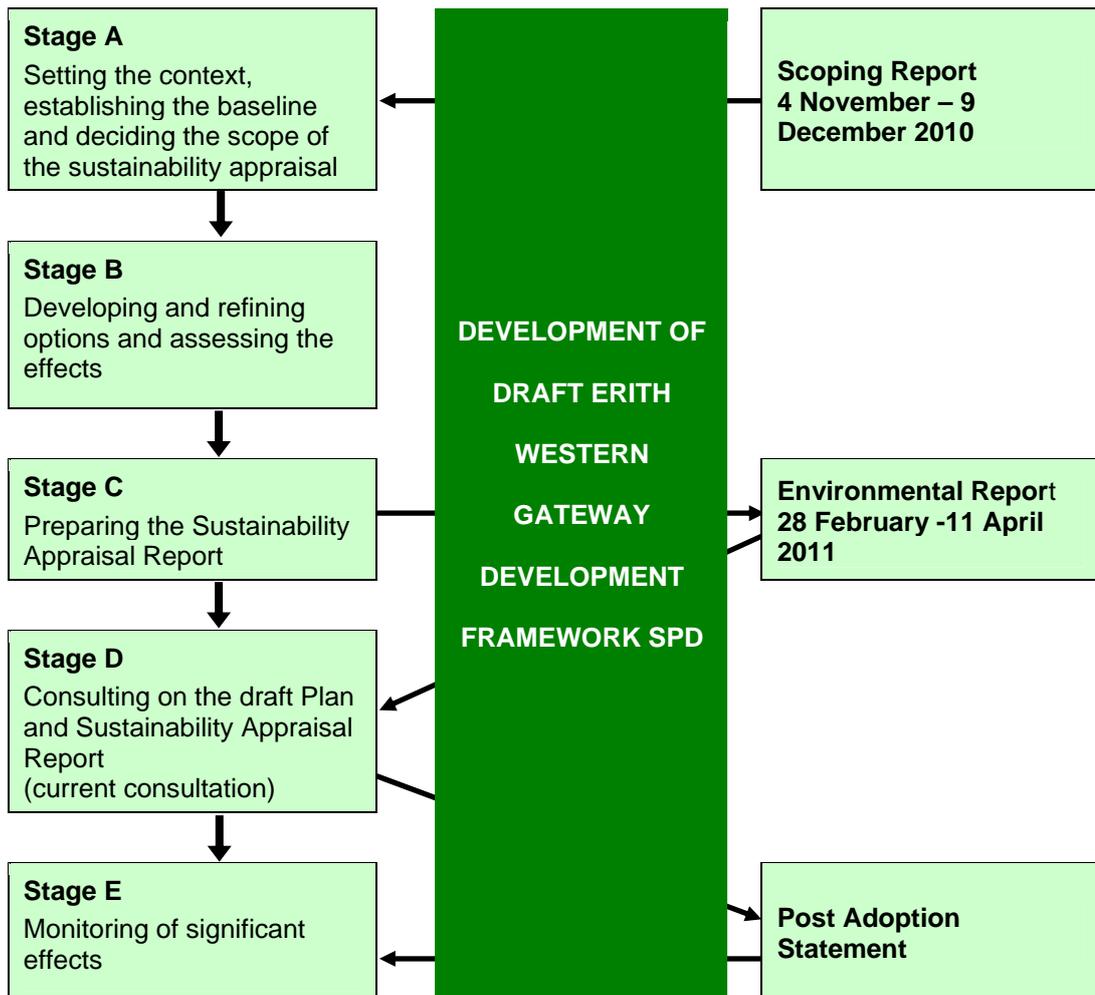


Figure (i): Stages of sustainability appraisal / strategic environmental assessment

3. How is the Erith Western Gateway Development Framework SPD assessed?

The assessment of the Erith Western Gateway Development Framework SPD has been undertaken using an objectives-led approach. The sustainability appraisal objectives (listed below) are the same as those utilised for the appraisal of Bexley's Core Strategy, and they have been devised from the baseline evidence, a consideration of the key sustainability issues for the London Borough of Bexley, the review of plans and programmes and the comments received during consultation on the Scoping Report prepared for the Erith Western Gateway SPD (November 2010).

The objectives have been developed to represent the preferred environmental, social or economic outcome, which typically involves minimising detrimental effects and enhancing positive effects. They have been formulated to allow for a comprehensive assessment of the key effects of the implementation of the SPD, by covering the relevant social, environmental and economic aspects that together facilitate sustainable development. The sustainability appraisal objectives are as outlined in table (i) below.

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Social Sustainability Objectives

1. **Accessibility:** To improve access to essential services and facilities.
2. **Education and skills:** To improve the education and skills of the population overall.
3. **Housing:** To provide everyone with the opportunity to live in a decent home.
4. **Human health:** To improve the health and wellbeing of the population.
5. **Prosperity and inclusiveness:** To reduce poverty and social exclusion.
6. **Quality of surroundings:** To improve the quality of where people live, including improvements to community safety, reducing crime and the fear of crime (neighbourhood satisfaction, sense of community, crime, fear of crime, noise).

Environmental Sustainability Objectives

7. **Air quality:** To improve air quality.
8. **Biodiversity:** To maintain and enhance biodiversity, flora and fauna.
9. **Climate change:** To reduce negative contributions and vulnerability to climate change.
10. **Cultural heritage:** To maintain and where appropriate enhance cultural heritage and the historic environment.
11. **Flood risk:** To reduce and manage flood risk.
12. **Landscapes, townscapes and open spaces:** To maintain and enhance the quality of landscapes and townscapes, including open spaces.
13. **Land, water and soil:** To improve land, water and soil quality and the sustainable use of these resources.
14. **Transport:** To reduce car dependency and encourage sustainable modes of transport.
15. **Waste management:** To minimise the production of waste and promote sustainable waste management.
16. **Spatial efficiency:** Increase the efficiency of land use and the utilisation of existing infrastructure within its capacity.

Economic Sustainability Objectives

17. **Economic growth:** To encourage and accommodate sustainable economic growth.
18. **Employment:** To provide opportunities for rewarding and satisfying employment.
19. **Investment:** To encourage and accommodate the indigenous economy including entrepreneurship, and leverage potential inward investment.

Table (i): Sustainability appraisal objectives

The sustainability appraisal objectives cover all of the topics that the assessment is required to include information on (including those set out in the Strategic Environmental Assessment Directive). In addition, the government guidance on sustainability appraisal (ODPM, 2005) indicates that the process should also cover social and economic issues such as economy, society, education, skills, transport and prosperity and inclusiveness.

The sustainability appraisal identifies and assesses those effects arising from the draft Erith Western Gateway Development Framework SPD. Specifically, it considers the extent to which the SPD contributes toward achieving the sustainability appraisal objectives, when considered against the baseline. It also considers relevant influencing factors, direct, indirect and cumulative potential effects.

4. What are the key effects of the Erith Western Gateway Development Framework SPD?

The sustainability appraisal of the Erith Western Gateway SPD was undertaken as an iterative process, with the appraisal utilised to select the preferred option and feeding into the development and refinement of the emerging SPD. A commentary on the sustainability appraisal feedback on the various options and the selection of the preferred option is provided in Chapter 4 of this report. As a consequence, the

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sustainability appraisal has influenced the development of the Erith Western Gateway SPD and its influence is evident in the broad approach taken to the guidance and its key themes.

Overall, the assessment of the Erith Western Gateway SPD has found it to be broadly positive when considered against the 19 sustainability appraisal objectives. Some of the key strengths of the SPD include:

- The SPD seeks to deliver a network of residential streets that provide direct, safe and enjoyable pedestrian links between the town centre, the river Thames and the station, and to create and improve pedestrian and cycle links.
- The SPD facilitates the potential redevelopment of the Walnut Tree depot site for education and commercial use.
- The SPD provides for the development of up to 340 new homes, with flexibility provided around the retention or re-provision of housing in the Orbit towers.
- The SPD seeks to create a new cohesive community with improved living environments and the potential for improved leisure opportunities, including an improved public realm.
- The SPD seeks to create a community focal point at Riverside Gardens and ensure wildlife habitats and biodiversity are protected, enhanced and promoted through the new development.
- The SPD seeks to ensure that new development incorporates a range of measures to minimise resource consumption, encourage green lifestyles and improve environmental quality.
- The SPD provides a positive opportunity to enhance the conservation area at riverside gardens, whilst ensuring that development does not adversely impact on it.
- The SPD seeks to combine fully integrated flood defences into the redevelopment of the Riverside Gardens to ensure that they do not dominate the open space, and integrate flood defences, sustainable urban drainage systems and water saving measures into new development to positively manage and mitigate flood risk.
- The SPD will assist to reduce the extent of vacant land and the number of vacant buildings, minimise resource use and increase the provision of key services and facilities.
- The SPD will assist to recreate the Erith High Street and provide for commercial uses totalling 16,000sqm of floor space that can be used for a variety of uses or applied flexibly, so if insufficient demand exists then the units can be converted to other uses, including residential.

It is recognised however that the SPD provides strategic guidance, and as such specific development projects (such as individual new buildings, homes or developments) may give rise to a variety of effects that could be potentially positive or negative. These effects may occur as a result of individual developments, or cumulatively alongside other developments. Negative effects that could occur as a result of development could include a strain on natural resources or infrastructure, pressure to build on areas susceptible to flood risk, or poorly design development that does not contribute to enhancing the character of the Erith Western Gateway or the wider Erith geographic region. Clear guidance is set out in the SPD to minimise the risk of this however, and the

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assessment of individual proposals, including, where appropriate use of the environmental impact assessment (EIA) process is likely to assist to minimise this risk.

Therefore, it can be concluded that as far as this SPD can influence, no significant adverse effects are anticipated to occur as a result of the Erith Western Gateway Development Framework SPD. However, as there is uncertainty as to how the guidance could be implemented in future development, it is important that an effective monitoring regime is developed to review the impacts and effectiveness of the document against the sustainability appraisal objectives over time.

5. How will any effects be monitored?

The London Borough of Bexley currently monitors a significant number of indicators. Part 5.2 of this report considers each of the sustainability appraisal objectives and monitoring measures for these, based on the key sustainability issues identified in the policies, plans and programmes review. It then evaluates whether any of the existing indicators monitored by the Council provides trends and significant effects data, or whether new significant effects need to be developed to provide this information. The list of indicators and monitoring measures identified against each sustainability appraisal objective illustrates the breadth of coverage.

6. What are the next steps?

This Sustainability Appraisal Report is issued for consultation alongside the draft Erith Western Gateway Development Framework SPD. Consultation will last for six weeks from **28 February** to **11 April 2011**. Following receipt of comments on the SPD and associated sustainability appraisal report, amendments will be made prior to a recommendation being made to adopt the framework as a Supplementary Planning Document.

7. How do I comment on the sustainability appraisal report?

All responses on the draft Erith Western Gateway Development Framework SPD and/or the Sustainability Appraisal Report must be received by **11 April 2011**.

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1.1 Introduction

This Sustainability Appraisal Report presents the results of the sustainability appraisal and strategic environmental assessment (SEA) process of the draft Erith Western Gateway Development Framework Supplementary Planning Document (SPD). The SPD will guide prospective partners on acceptable uses and design expectations for the future development of the Erith Western Gateway, and on the phasing of the development of the area through a development framework.

A sustainability appraisal attempts to predict and highlight the significant effects of implementing a planning document, and suggests ways to reduce negative effects, create or enhance positive effects, and to make predicted effects more certain.

The process of undertaking the sustainability appraisal of the Erith Western Gateway Development Framework SPD was outlined in the Sustainability Appraisal Scoping Report, which was consulted on in November 2010. This document proposed a number of sustainability appraisal objectives, designed to enable the testing of the social, environmental and economic performance of the SPD. The consultation on the scoping report for the sustainability appraisal assisted to refine the sustainability appraisal objectives, and also provided additional information on the scope of the sustainability appraisal.

The approach undertaken to the sustainability appraisal also fulfils the requirements for Health Impact Assessment. A separate Habitat Regulations Assessment was also undertaken for the Proposed Submission Core Strategy and this is anticipated to adequately address development at the Erith Western Gateway, as provided for by the guidance. An Equalities Impact Assessment has also been prepared to support the preparation of the Sustainability Appraisal Report, and to ensure a comprehensive consideration of the emerging SPD.

1.2 Sustainability Appraisal / Strategic Environmental Assessment

Sustainable development is central to the reformed planning system and to Government policy. *Securing the Future: Delivering the UK Sustainable Development Strategy* (HM Government, 2005) aims 'to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations'.

The *UK Sustainable Development Strategy* identifies a set of principles to be used to progress and achieve sustainable development, as follows:

- Living within environmental limits;
- Ensuring a strong, healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance;
- Using sound science responsibly.

Priority areas for immediate action outlined by the Strategy are as follows:

- Sustainable consumption and production;
- Climate change and energy;

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- Natural resource protection and environmental enhancement; and
- Creating sustainable communities and a fairer world.

Sustainability appraisal is a tool to assist local authorities to identify sustainable approaches for dealing with key planning issues and environmental concerns. Its purpose is to promote sustainable development through the integration of social, environmental and economic considerations into the plan making process, which is a key to achieving sustainable development.

The Planning and Compulsory Purchase Act 2004 introduced the requirement for local authorities to undertake a sustainability appraisal for each of their Development Plan Documents (DPDs) and certain other relevant planning documents. It is not compulsory to carry out a sustainability appraisal on a Supplementary Planning Document (SPD) where there has been a sustainability appraisal carried out on an adopted DPD for the area in question. As the London Borough of Bexley has not yet adopted any DPDs, a sustainability appraisal will be required for the Erith Western Gateway Development Framework SPD. Considering sustainability during the preparation and adoption of planning documents ensures that the likely social, environmental and economic effects of implementing a plan are taken into account when developing policies.

In addition to the sustainability appraisal, the European Directive 2001/42/EC on 'the assessment of the effects of certain plans and programmes on the environment', known as the SEA Directive, must also be met.

Under the requirements of the SEA Directive, specific types of plan must be subject to a strategic environmental assessment. This involves systematic identification and evaluation of the environmental consequences of implementing plans and policies. The SEA Directive applies to the preparation of new or revised DPDs, as well as a range of other plans.

SEA is focussed primarily on environmental effects, while sustainability appraisal considers all sustainability related effects – social, environmental and economic. The methodology followed in the completion of the sustainability appraisal of the Erith Western Gateway Development Framework SPD fulfils the requirements of both SEA and sustainability appraisal.

1.3 Purpose of the Sustainability Appraisal Report

The purpose of this Sustainability Appraisal Report is to present the findings of the sustainability appraisal of the draft Erith Western Gateway Development Framework SPD. It is structured as follows:

- **Chapter 1 Introduction:** An introduction to the sustainability appraisal and consultation arrangements.
- **Chapter 2 Overview of the draft Erith Western Gateway Development Framework SPD:** The context of the sustainability appraisal, including an overview of the process of development of the draft Erith Western Gateway Development Framework SPD.
- **Chapter 3 Methodology:** This section presents the baseline evidence (including the review of policies, plans and programmes) and the objectives used in the sustainability appraisal. It also provides information on the

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assumptions used in undertaking the sustainability appraisal and the technical difficulties encountered, the separate Equalities Impact Assessment and the Habitats Regulations Assessment carried out of the Proposed Submission Core Strategy.

- **Chapter 4 Assessment:** The assessment of the options proposed to address the need for guidance on the Erith Western Gateway (including the assessment of reasonable alternatives), which have culminated in the development of the SPD.
- **Chapter 5 Conclusion:** The key findings of the assessment are presented. A framework for monitoring any identified potentially significant effects is also proposed.

1.4 Consultation and stakeholder engagement

Consultation and stakeholder engagement are fundamental to the sustainability appraisal process, and reflects the principle that the development of plans is better where it is transparent, inclusive and uses information that has been subject to public scrutiny. The sustainability appraisal process aims to ensure that the key stakeholders, those parties who could be affected and the wider public have the opportunity to present their views on the findings of the assessment. At the scoping stage, consultation responses were sought from statutory consultees identified in the sustainability appraisal guidance (Natural England, English Heritage and the Environment Agency).

1.4.1 Consultation on this sustainability appraisal report

This Sustainability Appraisal Report is being issued for public consultation alongside the draft Erith Western Gateway Development Framework SPD. In addition to seeking views from statutory consultees, this Sustainability Appraisal Report is available to all organisations/ individuals that have an interest in the SPD, and responses are welcome. The consultation period will run for six weeks from **28 February** to **11 April 2011**.

How to give your views

All responses to the draft Erith Western Gateway Development Framework SPD and/or the Sustainability Appraisal Report must be received by **11 April 2011**. They should be sent to:

Strategic Planning and Development
London Borough of Bexley
Wyncham House
207 Longlands Road
Sidcup, Kent DA15 7JH

or by email to: planning.strategy@bexley.gov.uk with 'Erith Western Gateway Development Framework SPD' as the title.

Please note, if you send a response by email it is not necessary for you to also send in a hard copy. If your response only covers the Sustainability Appraisal Report, please make this clear in the subject line of your response. All responses will be made available for public inspection.

Chapter 2: Overview of the SPD

2.1 Need for the Erith Western Gateway Development Framework SPD and how the document was developed

The Erith Western Gateway area has emerged as a significant development opportunity over the last decade as the potential to amalgamate individual sites to enable a comprehensive design solution has become apparent. The opportunity was initially set out in the Erith Western Gateway Renaissance Strategy and Planning Brief, which was adopted as Supplementary Planning Guidance in January 2004. The objectives of regeneration, high quality design, an improved community and leisure offer and improved sustainability are still central to the vision for the future development of the Erith Western Gateway today.

The original document set out in the adopted strategy and planning brief a group of seven sites along the riverside section of the High Street and Walnut Tree Road. The failure to attract any significant development proposals and interest from the market with regard to regeneration possibilities in the area, prompted the re-evaluation of the scale of the development opportunity. As a consequence, the development area was extended to incorporate adjacent sites, including the Orbit Housing site.

The Homes and Communities Agency (HCA) provided initial funding for the production of a regeneration framework by EDAW Consultants to develop and expand the original guidance and to inform a site marketing and development competition in 2008. Volatile market conditions and severe problems with the financial markets led to the withdrawal of the preferred development partner identified through this competition in early 2009. The importance of the site remained however, and therefore the London Borough of Bexley, HCA and Orbit South Housing Association commissioned the design team of Maccreanor Lavington architects and PTEa to help revise the existing regeneration framework, in light of the marketing exercise and submissions received, and consider how early phases of the development of the Western Gateway might be brought forward. The resulting development framework has been considered for moving forward through a number of mechanisms, including the preparation of a Supplementary Planning Document. In deciding to progress a Supplementary Planning Document, five options (alternatives) were evaluated:

- **Option A:** 'Do Nothing' – Continue development with no further intervention over and above the Erith Western Gateway Renaissance Strategy 2004 (current applicable planning guidance).
- **Option B:** Develop and adopt a Supplementary Planning Document using the Maccreanor Lavington development framework as its basis.
- **Option C:** Submit an outline planning application based on the Maccreanor Lavington development framework.
- **Option D:** Maccreanor Lavington development framework not formally adopted as guidance but acknowledged as being potentially helpful in the future development of the site (similar to Option A but with additional informal detail on suggested development outputs).
- **Option E:** EDAW framework not formally adopted as guidance but acknowledged as being potentially helpful in the future development of the site (similar to 2007 marketing of the site).

Chapter 2: Overview of the SPD

The evaluation of the options and selection of a preferred option is discussed in further detail in chapter 4 of this report.

2.2 Overview of the Erith Western Gateway Development Framework SPD

The Erith Western Gateway Development Framework SPD will guide prospective partners on acceptable uses and design expectations, and the phasing of development of the area through a development framework. A vision has been outlined for the future development of the Erith Western Gateway to assist in the creation of a new, coherent, predominantly residential riverside community situated between Erith Town Centre and the river Thames, providing a mix of housing, new and improved business premises and educational uses set within a framework of new residential streets with an improved public realm. The vision for Erith Western Gateway is as detailed in the box below:

Vision for Erith Western Gateway

Erith Western Gateway regeneration will create a new coherent, residential riverside community exploiting Erith's unique setting and integrating well within the existing town, residential areas and facilities. It will provide a mix of housing, new and improved business premises and educational uses set within a framework of new residential streets with an improved public realm. Central to the vision is the rejuvenated Riverside Gardens the will transform Erith's waterfront into a compelling destination and resource for local people and visitors alike. The gardens will be redesigned, transforming them into a truly civic / green space to support the enhanced residential neighbourhood and Erith town centre as well as reinvigorating the garden's relationship to the Thames and its foreshore. This will be combined with fully integrated and upgraded flood defences to ensure that they will not dominate the new open space. The reworking of the gardens will reflect the history and character of the area. The redefinition of Erith High Street by new urban buildings will result in the creation of unique waterfront residential opportunities which will form an active edge to the new Riverside Gardens.

A network of new residential streets will be delivered, providing direct, safe and enjoyable pedestrian links between the station, Erith town centre and the riverfront. Simple, uncluttered, robust and attractive streets will be created providing a memorable setting for good buildings, and establishing a distinctive identity. Subtly distinctive residential and mixed use characters will be created within the area, avoiding 'difference for its own sake' and excessive contrasts between adjoining areas and buildings. A medium rise neighbourhood will result, consisting predominantly of houses and apartment buildings, producing a consistent townscape, designed to achieve 'harmonious diversity' and allow for the integration of pre-existing elements. A series of flexible urban blocks will be created capable of adapting to a variety of possible uses as the area matures and society evolves.

The vision is supported by a series of urban design principles, which have been developed to guide the future development and ensure the delivery of the vision. These principles cover the following broad areas:

- Urban structure, form and massing

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- Density and land uses
- Public realm
- Environment and sustainability

The SPD follows guidance in national and regional planning policy. It is consistent with Bexley's saved Unitary Development Plan policies, and with the Proposed Submission Core Strategy.

Chapter 3: Methodology

3.1 Stages of the Sustainability Appraisal/ Strategic Environment Assessment

The Sustainability Appraisal Report provides an assessment of the draft Erith Western Gateway Development Framework SPD and its contribution towards achieving a range of social, environmental and economic objectives. The approach adopted in this report is in accordance with the requirements of the SEA Directive, and is also based on the five main stages of sustainability appraisal as identified in the guidance issues by the ODPM (2005), as summarised in table 3.1 below.

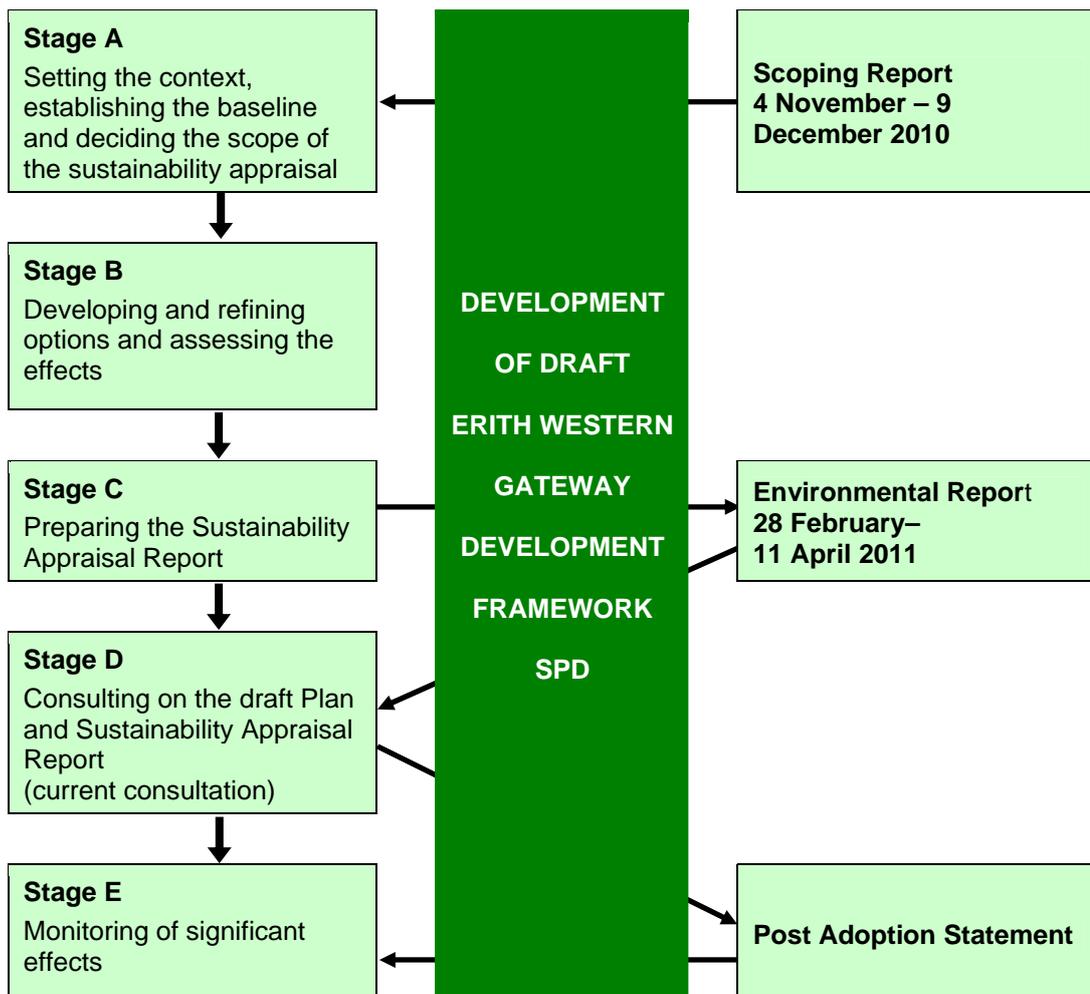


Table 3.1: Main stages of sustainability appraisal / strategic environmental assessment

The first stage of the sustainability appraisal involved setting the context and establishing the baseline against which the draft Erith Western Gateway Development Framework SPD was assessed. The key output of Stage A was the scoping report, which was subject to consultation with the statutory consultees from 4 November – 9 December 2010. Responses received to the scoping report have been reflected in this Sustainability Appraisal Report. Stages B, C and D involve developing and refining options, assessing effects and preparing the Sustainability Appraisal Report for consultation alongside the draft Erith Western Gateway Development Framework SPD (this consultation). The remaining stage (Stage E) involves monitoring the effects of the plan, and this is dealt with in further detail in part 5.2 of the report.

Chapter 3: Methodology

This section sets out the methodology, including the scope of the assessment (section 3.2), the method for collecting and presenting the baseline (section 3.3), the objectives and issues (sections 3.3 and 3.4), when the assessment was undertaken and by who (section 3.5), and assumptions and technical difficulties (section 3.6). Information on the Habitat Regulations Assessment carried out for the Proposed Submission Core Strategy and how this impacts on the SPD and the Equalities Impact Assessment is also provided (sections 3.7 and 3.8).

3.2 Scope of the Sustainability Appraisal / Strategic Environmental Assessment (SEA)

3.2.1 Thematic scope

The thematic scope covered by the sustainability appraisal objectives have been informed by the topics identified in Annex I of the Strategic Environmental Assessment Directive. Table 3.2 below highlights how the strategic environmental assessment topics relate to the sustainability appraisal objectives.

SEA Directive Topic	Sustainability Appraisal Objective
Biodiversity	Biodiversity
Population	Accessibility, Education and skills, Housing, Prosperity and inclusiveness, Quality of surroundings, Economic growth, Employment, Investment
Human health	Human health
Fauna	Biodiversity
Flora	Biodiversity
Soil	Land, soil and water
Water	Land, soil and water
Air	Air quality
Climatic factors	Climate change, Flood risk
Material assets	Transport, Waste, Housing, Prosperity and inclusiveness
Cultural heritage (including architectural and archaeological heritage)	Cultural heritage
Landscape	Biodiversity, Landscapes, townscapes and open spaces, Land, soil and water

Table 3.2: Relationship between SEA Directive topics and sustainability appraisal objectives

3.2.2 Geographic scope

In general, the assessment will encompass the Erith Western Gateway and greater London Borough of Bexley. Where appropriate, the scope also extends beyond the geographic scope of the borough, including the London Boroughs of Havering and Barking and Dagenham (located to the north of Bexley), Greenwich (located to the east of Bexley), Bromley (located to the south of Bexley), and Dartford Borough Council, located to the east of Bexley.

In Erith Western Gateway in the context of the London Borough of Bexley and surrounding areas is illustrated on the following diagram:



Figure 3.1: Location of Erith Western Gateway in the context of the London Borough of Bexley

Baseline information relating to the Erith Western Gateway is contained in Appendix A – Erith Western Gateway Evidence Baseline, and the wider borough and geographic area is contained in Appendix B – Social Baseline, C – Environmental Baseline, and D – Economic Baseline. Information on the Erith geographic region, as further detailed in the Proposed Submission Core Strategy is contained in Appendix E – Erith geographic region (including Slade Green and Northumberland Heath).

3.2.3 Temporal scope

The effects of the draft Erith Western Gateway Development Framework SPD may change over time (i.e. in the short, medium and long term) for a number of reasons. The temporal effects of each of the policies have been considered in the sustainability appraisal where relevant, to enable a full consideration of potential effects. For the purposes of the assessment, the timescales have been defined as follows:

- **Short-term:** Effects that may potentially occur within the first five years of the implementation of the draft Erith Western Gateway Development Framework SPD;
- **Medium-term:** Effects that may potentially occur between five and ten years following the adoption of the draft Erith Western Gateway Development Framework SPD; and

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- **Long-term:** Effects that may potentially occur beyond ten years and also that may arise beyond the Core Strategy's specific lifetime where appropriate (i.e. post 2026).

3.2.4 Links with other sustainability appraisals/ seas

For consistency, the London Borough of Bexley has used the same set of sustainability appraisal objectives developed in the scoping report for the Core Strategy to evaluate other documents adopted as part of its Local Development Framework. These documents are all Supplementary Planning Documents, and are:

- Design for living – Bexley's residential design guidance (adopted 21 January 2006)
- Affordable Housing (adopted 9 March 2006)
- Bexleyheath Civic Offices Planning Brief (adopted 13 July 2007)
- Sustainable Design and Construction Guide (adopted 29 October 2007)
- Planning Obligations Guidance (adopted 26 July 2008)
- Lamorbey Planning Brief (adopted 8 September 2008)
- Thamesmead and Abbey Wood (adopted 31 December 2009)

During the preparation of the scoping report for the Site Specific Allocations Development Plan Document (DPD), one further additional objective was identified and consulted on. It is proposed that the existing framework, including this one additional objective (a total of 19 sustainability appraisal objectives), is utilised for the evaluation of the draft Erith Western Gateway Development Framework SPD.

The use of a consistent set of sustainability appraisal objectives has assist to ensure that the cumulative and synergistic effects anticipated from these documents can be accurately considered as part of the appraisal process. It has also ensured that the baseline information for the borough is consistently built upon and updated, to provide as complete and accurate picture of the borough as possible. The addition of one further objective, dealing with the maximisation and efficient use and provision of infrastructure is considered to complement the existing baseline information and sustainability appraisal objectives.

3.3 Baseline

3.3.1 Review of policies, plans and programmes

The SEA Directive requires a review of the plan's 'relationship with other relevant plans and programmes'. Figure 3.1 illustrates how the draft Erith Western Gateway Development Framework SPD relates to the hierarchy of plans and programmes prepared at the local, regional, national and international level.

One of the first steps in undertaking the sustainability appraisal of the draft Erith Western Gateway Development Framework SPD was to identify and review other policies, plans, programmes and strategies that are relevant to the SPD. These include documents from international, national, regional and local origins. Documents relevant to the SPD were identified in the scoping report, and are listed

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in Appendix A of the Sustainability Appraisal Report. Where relevant and necessary, this review has been updated to reflect changes in documents, legislation and guidance.

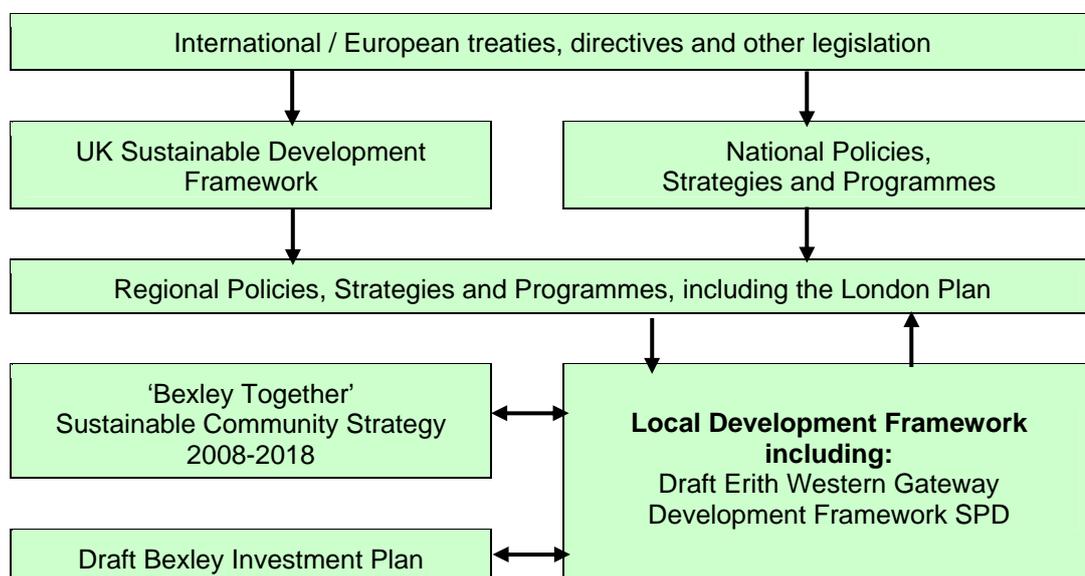


Figure 3.1: Relationship between the draft Erith Western Gateway Development Framework SPD and the hierarchy of policies, plans and programmes at international, national, regional and local level

The identification and review of plans and programmes has provided a useful source of information to support the social, environment and economic evidence base, as well as for framing the sustainability appraisal objectives that were used to test the options for the development of the SPD.

3.3.2 Baseline information and key issues

A key part of the sustainability appraisal process has been the identification of the current baseline social, environmental and economic conditions, and where possible the likely evolution of these conditions based on historic and future trends, assuming a baseline situation where no SPD was adopted (i.e. the current situation where development is managed by the Erith Western Gateway Renaissance Strategy (2004), support Unitary Development Plan and emerging Proposed Submission Core Strategy. This baseline situation was evaluated in Option A (refer to part 4.3 of this report). It is only with sufficient knowledge of the existing conditions that the key sustainability issues may be identified and addressed through the assessment process, by providing the context for determining the contribution that the draft Erith Western Gateway Development Framework SPD may make towards the achievement of the objectives. The strategic environmental assessment regulations also require that the subsequent effects of the implementation of the SPD on the baseline situation are monitored.

The baseline evidence for the draft Erith Western Gateway Development Framework SPD is presented in the scoping report, and included in Appendices A to E attached to this sustainability appraisal report. Where updates have been necessary, this has occurred to ensure that the most up-to-date information available has been considered in the appraisal of the policy options.

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The key sustainability issues for Bexley have been identified and are set out in table 3.3 below. They have been informed by the review of the policies, plans and programmes, the consideration of key baseline information, a review of key issues identified in the sustainability appraisal of the Proposed Submission Core Strategy and through consultation with statutory consultees. The key sustainability issues are considered to be cross-cutting issues, and are referenced as such in the baseline information presented for the borough.

Key Sustainability Issues
A. Increasing accessibility: Enhancing access to essential services and facilities, and ensuring that use of natural and physical resources is maximised, to minimise the impact of development.
B. Improving public and sustainable transport facilities: The need to reduce congestion and improve access to services and facilities by public and sustainable transport and reducing the need to travel. Reducing car dependency and emphasis on motor vehicles as the main form of transport, particularly for journeys within the borough and also reducing emissions to air from motor vehicles.
C. Increasing the level of skills and education of the borough's residents: The need to address the level of formal educational achievement, and the skills of the working age population in Bexley.
D. Delivering appropriate housing: Affordability, level of provision, high quality and sustainable new homes and a range of housing sizes that provide for households that are unsuitably housed, improve access, create a sense of place and maximise resource use.
E. Improving and protecting health and wellbeing: Addressing disparities of relative wellbeing across the borough and its associated impact on the capacity of residents to engage socially and economically.
F. Equalities: Variation in multiple deprivations across the borough and the impact of poverty on access to housing, transport, healthcare and education. Also ensuring all residents feel that they are part of their local community and their associated sense of wellbeing.
G. Promoting health and safety: Level of crime and fear of crime, and its relationship to creating a sense of place and community.
H. Protecting biodiversity, improving access to open space and nature: Conserving and enhancing biodiversity across London, improving the public realm and increasing people's opportunity for contact with nature, open spaces and waterways.
I. Responding to climate change: Responding to the threat of climate change through mitigation and adaptation, in the built and natural environment and by addressing flood risk, and maximising energy efficiency.
J. Safeguarding and enhancing heritage and the historic environment: The preservation of the historic environment, and ensuring that development respects the suburban character of Bexley and its unique and special features.
K. Improving cultural facilities: Enhancing levels of satisfaction with cultural facilities and improving Bexley's attractiveness as a visitor destination.
L. Managing waste: Managing waste in accordance with the waste management hierarchy, reducing the amount of waste generated and maximising the borough's waste capacity.
M. The changing economy: Responding positively to economic threats and growing the borough's economy, providing sustained employment growth and ensuring that the borough is an attractive place for business investment.
N. Development and renewal: Ensuring the sustainable development and renewal of the borough, including maximising use of existing natural and physical resources, maximising accessibility and addressing areas of deprivation.
O. Improving air quality: Addressing emissions to air from road traffic, and residential and workplace emissions which contribute to the whole of the borough being designated as an Air Quality Management Area.

Table 3.3: Key sustainability issues for the London Borough of Bexley

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3.4 Sustainability Appraisal objectives

The establishment of appropriate objectives is central to the assessment process, and provides a way in which the performance and effect of the draft Erith Western Gateway Development Framework SPD can be identified and described. Using objectives ensure that each topic area required by the strategic environmental assessment regulations is addressed and provides a framework which guides the assessment in a consistent manner, enabling the likely effects of the implementation of the SPD to be identified.

The objective-led approach is considered to be the most suitable for assessing the SPD as it enables the evaluation of the extent to which the guidance contributes towards the achievement of each objective, rather than if they will meet prescribed targets. It is therefore more qualitative and allows for a greater degree of identification and description of effects, rather than attempting to ascribe a quantitative value, which is more restrictive and has the potential to miss unexpected effects.

The sustainability appraisal objectives developed for the SPD have been informed by the objectives developed for the Proposed Submission Core Strategy, the evidence baseline, the consideration of key sustainability issues, review of plans and programmes and the comments received during consultation on the scoping report. These objectives have been tested and demonstrated to provide a comprehensive assessment tool for the development of strategic planning documents for the borough.

Broadly, the objectives present the preferred social, environmental or economic outcome sought for the borough, which typically involves minimising adverse effects and maximising positive effects. They have been developed to enable a comprehensive assessment of the key effects of the implementation of the SPD, by covering the relevant social, environmental and economic aspects of the emerging policies, including health and community safety.

A set of guidance questions has also been developed, to ensure that a comprehensive and consistent appraisal is carried out of each objective and to enable the appraisal to be carried out by multiple members of staff. The sustainability appraisal objectives and associated guidance questions are outlined in table 3.4 below.

Sustainability Appraisal Objective	Guide Questions for the Sustainability Appraisal
Social Objectives	
1. Accessibility: To improve access to essential services and facilities, especially where there is disadvantage or special needs.	<ul style="list-style-type: none"> • Will it promote adequate accessibility for those people who are elderly or disabled? • Will it reduce the overall need for people to travel by improving their access to services, jobs, leisure and amenities in the place in which they live? • Will it improve accessibility to work by public transport, walking or cycling?
2. Education and skills: To improve the education and skills of the population overall?	<ul style="list-style-type: none"> • Will it help to improve learning and attainment of skills? • Will it increase provision of facilities and providing skills and training in the borough? • Will it reduce levels of young people not in education, skills

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Sustainability Appraisal Objective	Guide Questions for the Sustainability Appraisal
	and training?
3. Housing: To provide everyone with the opportunity to live in a decent quality home.	<ul style="list-style-type: none"> • Will it reduce homelessness and overcrowding? • Will it reduce the number of unfit homes? • Will it increase the range and affordability of housing? • Will it promote lifetime homes? • Will it improve overall design quality? • Will it improve insulation and energy efficiency in homes to reduce fuel poverty and ill health?
4. Human health: To improve the health and wellbeing of the population, and reduce health inequalities.	<ul style="list-style-type: none"> • Will it help to reduce health inequalities? • Will it help to improve mental and emotional health and wellbeing? • Will it improve access to high quality public services (including health facilities)? • Will it assist to promote an active and healthy lifestyle? • Will it provide housing that ensures a good standard of living?
5. Prosperity and inclusiveness: To reduce poverty and social exclusion.	<ul style="list-style-type: none"> • Will it help reduce poverty and the impact of income inequality? • Will it promote a culture of equality, fairness and respect for people and the environment? • Will it promote equality for black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, older people, young people, children and faith groups?
6. Quality of surroundings: To improve the quality of where people live, including improvements to community safety, crime reduction and the fear of crime.	<ul style="list-style-type: none"> • Will it help people feel positive about the area they live in? • Will it help create a sense of place and vibrancy? • Will it encourage increased engagement in recreational, leisure and recreational activities? • Will it positively enhance and promote the perceived sense of place held by the community? • Will it reduce actual levels of crime and anti-social behaviour and the perception of crime in the area? • Will it help reduce actual noise levels and disturbances from noise?
Environmental Objectives	
7. Air quality: To improve air quality.	<ul style="list-style-type: none"> • Will it improve air quality? • Will it reduce emissions of greenhouse gases? • Will it help to reduce emissions of PM₁₀ and NO₂?
8. Biodiversity: To maintain and enhance biodiversity, flora and fauna.	<ul style="list-style-type: none"> • Will it conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife? • Will it improve the quality and extent of designated and non-designated sites? • Will it provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)? • Will it protect and enhance the borough's waterbodies and assist to achieve a good ecological status? • Will it promote, educate and raise awareness of the enjoyment and benefits of biodiversity, flora and fauna and the wider natural environment? • Will it result in the creation of new green spaces? • Will it contribute positively to the network of open spaces?

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Sustainability Appraisal Objective	Guide Questions for the Sustainability Appraisal
<p>9. Climate change: To reduce negative contributions and vulnerability to climate change, and facilitate adaptations to reduce the effects of climate change.</p>	<ul style="list-style-type: none"> • Will it increase use of sustainable design and construction principles in new development? • Will it assist to protect Bexley from adverse climate change impacts? • Will it help minimise emissions of greenhouse gases? • Will it avoid exacerbating the impacts of climate change? • Will it increase the proportion of energy both purchased and generated from renewable and sustainable resources? • Will it reduce the demand and need for energy? • Will it promote and improve energy efficiency? • Will it deliver green infrastructure?
<p>10. Cultural Heritage: To maintain and where appropriate enhance cultural heritage and the historic environment.</p>	<ul style="list-style-type: none"> • Will it protect and enhance sites, features and areas of historical, archaeological and cultural value/potential? • Will it support and enhance cultural heritage?
<p>11. Flood risk: To reduce and manage flood risk.</p>	<ul style="list-style-type: none"> • Will it manage existing flood risk appropriately, and avoid creating new flood risk? • Will it ensure that new development, and homes in particular, are well located in relation to flood risk? • Will it minimise the risk of flooding from rivers and watercourses to people and property?
<p>12. Landscapes, townscapes and open spaces: To maintain and enhance the quality of landscapes and townscapes, including open spaces.</p>	<ul style="list-style-type: none"> • Will it conserve and enhance the landscape and townscape character? • Will it promote high quality design and sustainable construction methods? • Will it enhance the quality of the public realm? • Will it improve the wider built environment and sense of place? • Will it protect and enhance the provision and areas of open space?
<p>13. Land, water and soil: To improve land, soil and water quality and the sustainable use of these resources.</p>	<ul style="list-style-type: none"> • Will it make the best use of scarce land resources and re-use brownfield sites? • Will it improve the quality of waterbodies? • Will it reduce discharges to surface and ground waters? • Will it promote the use of sustainable urban drainage systems? • Will it reduce water consumption?
<p>14. Transport: To reduce car dependency and encourage sustainable modes of transport.</p>	<ul style="list-style-type: none"> • Will it encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car sharing)? • Will it reduce traffic volumes and traffic congestion? • Will it reduce the length of commuting journeys? • Will reduce road traffic accidents?
<p>15. Waste management: To minimise the production of waste and promote sustainable waste management and recycling.</p>	<ul style="list-style-type: none"> • Will it help minimise the production of waste? • Will it promote re-use and recycling? • Will it ensure that appropriate facilities for the management of waste are incorporated into new development?
<p>16. Spatial efficiency: To increase the efficiency of land use and the utilisation of existing infrastructure within its capacity.</p>	<ul style="list-style-type: none"> • Will it help reduce the number of vacant and derelict buildings? • Will it improve infrastructure provision (e.g. water supply, sewerage, telecommunications, gas, electricity)? • Will it help minimise resource use? • Will it increase the provision of key services, facilities and

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Sustainability Appraisal Objective	Guide Questions for the Sustainability Appraisal
	employment opportunities?
Economic Objectives	
17. Economic growth: To encourage and accommodate sustainable economic growth.	<ul style="list-style-type: none"> • Will it improve sustainable business development? • Will it improve the resilience of business and the economy? • Will it prevent the loss of local businesses? • Will it support the development of green industries and a low carbon economy?
18. Employment: To provide opportunities for rewarding and satisfying employment.	<ul style="list-style-type: none"> • Will it help generate satisfying and rewarding new jobs? • Will it help reduce overall employment, particularly long-term unemployment?
19. Investment: To encourage and accommodate the indigenous economy, including entrepreneurship and encourage potential inward investment.	<ul style="list-style-type: none"> • Will it encourage new business start-ups and support the growth of businesses? • Will it make the borough a more attractive place to establish businesses?

Table 3.4: Sustainability appraisal objectives and guide questions

3.5 Completing the assessment

The sustainability appraisal of the draft Erith Western Gateway Development Framework SPD was carried out by a staff member with specialist experience in sustainability appraisal / strategic environmental assessment. To ensure impartiality, the staff member had little involvement in the development of the SPD prior to undertaking the sustainability appraisal.

The sustainability appraisal was carried out of the various options and feedback was carried out as an iterative process to ensure that feedback was incorporated into the emerging document. In predicting effects, changes were identified in the baseline which could occur as a result of the implementation of the SPD. The cumulative effects of implementing the SPD were also considered. However, due to the strategic and forward-looking nature of the document, quantitative information is not always available to inform the prediction of effects emerging from the SPD and where this is the case, the effects have been identified based on professional judgement by an experienced sustainability appraisal expert, and with consideration to relevant best practice guidance. In consequence, this Sustainability Appraisal Report presents the assessment of the emerging SPD, and options considered for the development of the SPD.

3.5.1 Policy development and iterations

The development of the draft Erith Western Gateway Development Framework SPD has been an iterative process involving sustainability appraisal, with other technical experts advising on the potential effects that may arise. Suggestions were proposed to improve the emerging guidance and to including mitigation measures through liaison with the strategic planning policy officer developing the emerging SPD. In this way, these suggestions were intended to mitigate potential negative effects (or enhance positive effects). Appendix G records the sustainability appraisal of the various policy options considered in the development of the SPD. The sustainability appraisal of Option B is the appraisal of the draft

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SPD. The changes identified in the appraisal have been incorporated into, and resulted in changes to the draft SPD. The key changes made are as follows:

- Inclusion of further detail on the specification of materials and equipment to be provided in the public realm. Particular examples of this include the specification of play equipment at Play Square, and the need to incorporate flexible and permeable surfaces at Station Square to mitigate runoff and provide for a range of activities.
- A more comprehensive specification of detail for the redevelopment of the Riverside Gardens, including details on the types of materials sought and the need for carefully designed flood defences integrated into the surface treatments within the public space.
- Expanding the reference to sustainable transport (walking and cycling) to ensure that it relates to day-to-day uses including local employment opportunities, rather than solely to recreational uses.
- Expanding guidance on the type of architectural form and massing sought in the new development to improve its appearance and amenity value, and to create a landmark development at Erith Western Gateway.

3.6 Assumptions and technical difficulties

3.6.1 Assumptions

The following assumptions have been made in the sustainability appraisal of the draft Erith Western Gateway Development Framework SPD:

- It is assumed that all relevant legal requirements will be met as necessary with regard to the achievement of the optimum social, environmental and economic conditions sought in the sustainability appraisal objectives. Therefore, specific reference to compliance with the statutory limits and targets has not been made during the matrix based assessment of the various options against the sustainability appraisal objectives.
- Where the terms 'minimise' or 'maximise' have been used, this refers to minimisation or maximisation subject to the consideration of the potential costs, practicalities and benefits as opposed to maximisation or minimisation regardless of cost, practicality or benefit.
- The 'nil' effects situation was determined on the baseline of the borough's characteristics on the day that the assessment was undertaken, to the extent that the baseline information could be updated. Where necessary, the baseline has been updated to ensure that it is kept as up-to-date as possible, but given the relatively minimal time elapsed between the preparation of the scoping report and undertaking the sustainability appraisal, relatively minimal updates will be required.

3.6.2 Technical difficulties

No technical difficulties were encountered in the completion of the sustainability appraisal of the Erith Western Gateway Development Framework SPD. Bexley has ensured that it has complied with the requirements of the SEA Directive as demonstrated in the check list contained in Appendix I.

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3.7 Habitat Regulations Assessment

A Habitat Regulations Assessment (HRA) screening report has been produced as required by the European Habitats Directive, enacted by the *Conservation (Natural Habitats and c) Regulations 1994* (the Habitats Regulations) of the Proposed Submission Core Strategy. This assessment evaluates the effects of the policies contained in the emerging Core Strategy on the whole of the London Borough of Bexley, and it is therefore considered to also be relevant to the draft Erith Western Gateway Development Framework SPD. As the SPD outlines guidance rather than policy, the screening carried out in the HRA of the Core Strategy is considered to cover the SPD, and a further screening opinion is not considered to be necessary. The HRA Screening Report is available at www.bexley.gov.uk.

3.8 Equalities Impact Assessment

An Equalities Impact Assessment has been produced to support the draft Erith Western Gateway Development Framework SPD, and this has been published separately to this sustainability appraisal report. The assessment has identified a number of aspects in the emerging guidance which potentially impact on equalities, and has concluded that there would be no likely significant effects.

Consultation has been carried out of the Equalities Impact Assessment with key equalities representatives. Feedback that was received on the Equalities Impact Assessment has assist with the finalisation of the report.

The Equalities Impact Assessment of the draft Erith Western Gateway Development Framework SPD is available at www.bexley.gov.uk.

Chapter 4: Assessment of options

4.1 Summary of options for development of SPD

As outlined in part 2.1 of this report, the Erith Western Gateway has emerged as a significant development opportunity over the last decade as the potential to amalgamate individual sites to enable a comprehensive design solution has become apparent. Various frameworks have been developed to guide the future redevelopment of the area, but as a consequence of volatile market conditions, a development has still not been delivered at the site.

Notwithstanding this, there is still a significant opportunity to realise a comprehensive development proposal at the Erith Western Gateway, and five options have been considered, based on previously developed frameworks to assist to guide the future development. The policy options considered are as follows:

- **Option A:** 'Do Nothing' – Continue development with no further intervention over and above the Erith Western Gateway Renaissance Strategy 2004 (current applicable planning guidance)
- **Option B:** Develop and adopt a Supplementary Planning Document using the Maccreeanor Lavington development framework as its basis
- **Option C:** Submit an outline planning application based on the Maccreeanor Lavington development framework
- **Option D:** Maccreeanor Lavington development framework not formally adopted as guidance but acknowledged as being potentially helpful in the future development of the site (similar to Option A but with additional informal detail on suggested development outputs).
- **Option E:** EDAW framework not formally adopted as guidance but acknowledged as being potentially helpful in the future development of the site (similar to 2007 marketing of the site).

These options have been evaluated using the sustainability appraisal matrix, and a preferred option selected. A summary of the evaluations and selection of the preferred option is presented in parts 4.3 – 4.7 of this report.

4.2 Baseline

The Erith Western Gateway is a collection of sites in the north of Erith town centre and adjacent to the river Thames, totalling some 7.65 hectares. The area incorporates a mixture of land uses, with numerous ownerships. It is characterised by buildings of varying ages and designs, interspersed between areas of open space, hard standing and vacant land. The area has a unique topography resulting from the development and quarrying of the land as it slopes downwards toward the river. The Erith Western Gateway has emerged as a significant development opportunity as the potential to amalgamate sites to create a new coherent, predominantly residential riverside community adjacent to the river Thames.

The baseline information that specifically relates to the Erith Western Gateway development area is contained in Appendix A. The social, environmental and economic baselines provide broader subject based information on the borough's key characteristics, and where possible a comparison to regional and national trends. This baseline information is arranged by theme, according to the sustainability appraisal objectives. This baseline information is contained in

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Appendices B – D. There is also specific information that provides a baseline on the Erith geographic region as identified in the Proposed Submission Core Strategy, and this is contained in Appendix E.

4.3 Assessment and predicted effects of option A

This option is the existing baseline situation at Erith, and it comprises of the existing development at Erith and the adopted Erith Western Gateway Renaissance Strategy. The Renaissance Strategy seeks to inform the comprehensive redevelopment of seven sites at Erith, with the types of development sought including a hotel with linked café, restaurant and gymnasium, over 200 housing units, multi-functional community facility, new community and leisure facilities around the riverside and open space and modest sized retail and commercial units on the ground floor of housing blocks. No development has occurred however, to implement the vision sought in the Strategy, and some time has passed since its adoption which reduces the likelihood of the positive effects anticipated actually being achieved. The key effects of retaining the baseline situation are summarised in the box below.

Key effects of Option A: ‘Do Nothing’ – Continue development with no further intervention over and above the Erith Western Gateway Renaissance Strategy 2004 (current applicable planning guidance)

This option is anticipated to:

- Enhance accessibility by maximising public transport links, including focussing development within 10 minutes walk of Erith station. The Strategy is silent however, on reducing the overall need for people to travel and improving accessibility to work by walking and cycling.
- Provide for the construction of over 200 housing units, including 35 affordable homes in accordance with Unitary Development Plan policy spread throughout the site. The Strategy seeks that housing be provided in high quality, high density development with elements of award-winning design.
- Provide multi-functional community facilities as part of housing and new community / cultural facilities within and around the riverside open space. It also seeks the potential provision of a gymnasium, all of which could have a small impact on improving access to high quality public services and may also assist to promote an active and healthy lifestyle.
- Create a sense of place, assist people to feel positive about where they live, assist to reduce crime and the fear of crime, and improve the quality of where people live.
- Provide for development that maintains and enhances the nature conservation value of the river Thames corridor and adjacent land, given the river’s position as one of the borough’s most important natural features and its designation as a Site of Metropolitan Importance for Nature Conservation.
- Provide for the existing historic buildings and heritage features in the Erith Western Gateway and the conservation area, and utilise it as an opportunity for mixed character in the redevelopment.
- Recognise the constraints presented by existing flood defences and the need to mitigate flood risk.

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- Recognise the open space value of Erith riverside gardens.
- Promote the redevelopment of brownfield land and the potential for land contamination as a consequence of previous land uses and take a precautionary approach to site redevelopment.
- Provide for the development of new community infrastructure as part of comprehensive site redevelopment; but the Strategy is silent on additional provision or securing funding through new development to provide appropriate infrastructure.
- Provide modestly sized retail and other commercial units on the ground floor of housing blocks. The Strategy is silent on other economic growth, business and the development of green industry.

It is important to note that the baseline situation is informed by an existing strategy, which sets a different threshold in terms of the nil effects situation. As the Renaissance Strategy is somewhat dated and does not have the benefit of the latest site information or planning standards. It is also limited in terms of the sites that the document applies to and the aspirations sought for future development.

4.4 Assessment and predicted effects of option B

The Erith Western Gateway SPD provides for a development that will provide a mix of housing, new and improved business premises, leisure and educational uses set within a framework of new residential streets with an improved public realm. The rejuvenation of the Riverside Gardens is central to the vision for the development, transforming Erith's riverside into a compelling destination and resource for local people and visitors alike. The key effects of adopting the SPD are summarised in the box below.

Key effects of Option B: Develop and adopt a Supplementary Planning Document using the Maccreevor Lavington development framework as its basis

The adoption of the Erith Western Gateway SPD is anticipated to:

- Deliver a network of residential streets that provide direct, safe and enjoyable pedestrian links between the town centre, the river Thames and station, and to create and improve pedestrian and cycle links to regional and borough wide open space networks and to improve recreational accessibility and environmental quality.
- Facilitate the potential redevelopment of the Walnut Tree depot site for education and commercial use. Bexley College has confirmed that the Erith Western Gateway is its preferred option for the relocation of its existing campus. This development will provide a gateway for Erith and by the first building encountered by people approaching the town from the station.
- Provide for the development of approximately 340 new homes, based on an area wide net density of approximately 530 habitable rooms per hectare, with flexibility provided around the retention or re-provision of housing in Orbit towers. A medium rise neighbourhood is anticipated to result, consisting predominantly of houses and apartment buildings and achieving higher densities without reliance on high buildings. The new housing should be a mix of family houses and flats, reflective of need in the area. The approach in the SPD is anticipated to lead to increasingly positive effects for housing and prosperity and inclusiveness, and to provide healthy homes that incorporate the principles of sustainable design and construction.

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- Create a new cohesive community with improved living environments and the potential for improved leisure opportunities, including an improved public realm which could assist to reduce health inequalities by encouraging an active and healthy lifestyle.
- Create a community focal point at Erith Riverside Gardens and ensure that new development designs out crime and the fear of crime, which is likely to have increasingly positive effects over time to assist people to feel positive about where they live, create a sense of place and vibrancy, encourage increased engagement in leisure and recreational activities and level of community safety.
- Ensure wildlife habitats and biodiversity are protected, enhanced and promoted through the new development, and seek the enhancement of biodiversity habitats wherever possible in the redevelopment of the Riverside Gardens.
- Ensure that new development incorporates a range of measures to minimise resource consumption, encourage green lifestyles and improve environmental quality.
- Utilise the redevelopment of the Erith Western Gateway as a positive opportunity to enhance the conservation area whilst ensuring that development does not adversely impact on it. The SPD also provides the opportunity to provide appropriate social and cultural infrastructure located at places of maximum footfall.
- Combine fully integrated flood defences into the redevelopment of the riverside gardens to ensure that they do not dominate the open space, and integrate flood defences, sustainable urban drainage systems and water saving measures into new development to positively manage and mitigate flood risk.
- Enhance the townscape through capitalising on physical characteristics of the area to create vistas, integrate existing historic buildings into new development and deliver new and improved public spaces and public realm with visually connected green spaces. The SPD is considered to be positive to enhance the character of the wider built environment in Erith.
- Reduce the extent of vacant land and number of vacant buildings, minimise resource use and increase the provision of key services and facilities.
- Facilitate the reuse of brownfield sites, address ground contamination from historic land use and encourage the minimisation of resource use.
- Recreate the Erith High Street and provide for flexible commercial uses totalling 16,000 sqm of floor space that can be used for small retail or B1 workspace units, office or educational facilities, café/restaurant facilities and a potential hotel development. The framework enables this approach to be applied flexibly, so if insufficient demand exists then the units can be converted to other uses, including residential. The approach is considered to be positive to facilitate sustainable business and employment growth and could potentially attract new local businesses.

The SPD is anticipated to deliver development in line with its vision, and to generate particularly positive effects on the quality of surroundings at Erith, and also to enhance the quality of the townscape and open space provision. The development of new, high quality housing that is fit for purpose and addresses need will be positive to make Erith a more attractive place to live, and the rejuvenation of the Riverside Gardens has the potential to generate a quality public space that could be attractive as a resource for the whole of the borough, as well as local residents.

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4.5 Assessment and predicted effects of options C and D

Options C and D take different approach to implement guidance provided by the Maccreeanor Lavington framework, developed in 2009. The framework seeks to create a predominantly residential riverside community with a mix of housing, new and improved business premises and educational uses, including the transformation of the Riverside Gardens into a landscaped public park.

The approach taken in Option C seeks the submission of an outline planning application for the implementation of the framework. The approach taken in Option D seeks that the framework be considered as guidance, but that it is not developed into formal guidance or adopted into the Local Development Framework. If this approach was taken then the framework would be a material consideration, but it would lack the full statutory weight of an SPD. The sustainability appraisal of these two options identified largely similar effects from both. The anticipated effects from the options are summarised in the box below.

Key effects of Option C: Submit an outline planning application based on the Maccreeanor Lavington development framework

Key effects of Option D: Maccreeanor Lavington development framework not formally adopted as guidance but acknowledged as being potentially helpful in the future development of the site (similar to Option A but with additional informal detail on suggested development outputs).

Options C and D are anticipated to:

- Assist to deliver a hierarchy of streets and other public spaces that will activate key routes. It could also potential deliver improved public transport infrastructure, allowing for reduced car use and potentially reduced parking provision.
- Redevelopment of part of the Walnut Tree depot site for education use, and Bexley College has confirmed that the Erith Western Gateway is its preferred option for the relocation of existing main campus.
- Provision of 342 new homes in addition to the existing 108 homes in the existing Orbit towers, with a mix of family homes and flats reflective of need in the area. Design, incorporation of sustainable design and construction, providing safe and secure living environments and affordable housing will be key considerations in the new development.
- Improved leisure opportunities and an improved public realm may be positive to reduce health inequalities by improving the quality of housing and allowing for new community facilities, assisting to promote an active and healthy lifestyle and enhancing health and wellbeing.
- Effects of air quality are considered to be uncertain and dependent on the form and effects of future development.
- Provide a development that ensures that wildlife habitats and biodiversity are protected and enhanced through the integration with new development, which is likely to lead to positive effects for biodiversity, flora and fauna.
- Seek that development should incorporate a range of measures to minimise resource consumption and encourage green lifestyles, which has the potential to be positive for climate change adaptation and mitigation.

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- Ensure that heritage listed buildings are protected and specific uses are provided for, and for the redevelopment of Riverside Gardens as a civic space. This approach has the potential to be positive for cultural heritage.
- The framework has the potential to result in positive effects for spatial efficiency through the creation of a new network of streets with a legible hierarchy, supported by new open spaces.
- The provision of approximately 15,190sqm of new commercial floor space for retail, hotel and office facilities, and the provision of 900sqm of converted office floor space in the Carnegie building, which could alternatively be used for community or education use, which is likely to deliver positive effects for economic growth, employment and investment.

Notwithstanding the potential for positive effects identified above, both of these options are considered to be the subject of a high degree of uncertainty, which has reduced their scoring in the sustainability appraisal.

For Option C – submit a planning application based on the Maccreeanor Lavington development framework, the risk of the planning application approach is that it does not provide flexibility in the delivery of the scheme, increasing the likelihood that it will not be delivered.

For Option D – Utilise the Maccreeanor Lavington development framework as guidance, there is considered to be a high level of uncertainty as a consequence of its non-regulatory status, and this uncertainty is likely to increase over time as the framework becomes dated and is more likely to be overlooked by prospective developers.

Notwithstanding the uncertainty, development in line with the Maccreeanor Lavington framework has the potential to deliver on its vision, and to generate particularly positive effects for the townscape and open spaces, housing and the quality of surroundings. If development is delivered in line with the framework it has the potential to make Erith a more attractive place to live, and to create a public space at Riverside Gardens that is attractive for both local residents and the wider borough.

The use of the framework could potentially assist to deliver the vision for the Erith geographic region as outlined in the proposed submission Core Strategy. The uncertainty as a consequence of the approaches proposed in these options results in Option B – development of an SPD, being considered to be a preferred option.

4.6 Assessment and predicted effects of option E

Option E seeks to utilise a framework developed by EDAW in 2007 for the Erith Western Gateway, and utilise this as guidance but not formally adopt it. This approach is similar to 2007 marketing of the site. The framework would be a material consideration in any future planning application.

The vision in the EDAW brief seeks the creation of an exemplary 21st century mixed use scheme providing housing, employment, retail and leisure facilities in an economically, environmentally and socially sustainable manner. It further seeks that development should exploit the physical and visual links between Erith town centre, the river Thames, railway station and the wider hinterlands to re-establish

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Erith as one of the few true riverside towns. The anticipated effects of the option is summarised in the box below.

Key effects of Option E: EDAW framework not formally adopted as guidance but acknowledged as being potentially helpful in the future development of the site (similar to 2007 marketing of the site)

The option is anticipated to:

- Ensure that the existing road network will contribute to provide the vehicular distribution network for the site, with a redesign occurring to improve pedestrian movement and safety, including wide pavements, clear crossing points and reduced traffic speeds. The redesign of carriageways is also proposed to provide for buses and lorries. It does not seek any improvement to public transport to support new development however.
- Provide family housing in both traditional and apartment-style development, utilising high quality design which will enhance opportunities for people to live in a decent quality home.
- Facilitate the provision of social infrastructure, including healthcare, emergency and essential services to support new development. The guidance also seeks additional open space provision and to enhance walking sites into and around the site, which is likely to encourage more active and healthy lifestyles.
- The guidance seeks to provide a new development incorporating high sustainability standards, providing high quality residential development supported by other land uses including small scale retail, hotel, business, leisure, recreation, open space and play space. This is likely to lead to increasingly positive effects over time on improving the quality of surroundings, including creating a sense of place and vibrancy, and ensuring a good mix of activities and uses.
- Make maximum use of natural ventilation and shading, including green roofs and walls, which are acknowledged as a good source of biodiversity, the use of sustainable urban drainage systems and the enhancement of biodiversity and ecology.
- The guidance provides comprehensive detail on sustainability, climate change and energy efficiency, including conformity with the Code for Sustainable Homes, reducing carbon emissions, maximising the use of renewable energy, waste minimisation (construction and domestic), economic and social sustainability, renewable materials, potential for district heating / combined heat and power (CHP), water conservation, minimising flood risk, social infrastructure provision, sustainable urban drainage systems and promoting ecology and biodiversity. The approach is likely to generate major positive effects for climate change adaptation and mitigation.
- Provide a development that is future facing but reflective of the history and character of the area. The guidance also proposes to provide appropriate social and cultural infrastructure to support the new development.
- Provide significant public realm improvements including the development of new public areas in a number of locations in the Erith Western Gateway. The guidance further seeks that there will be a combination of private and communal open spaces, that new residential development provides a frontage to open space where possible, and that tree planting and public art is provided. The guidance is also clear that the development at Erith Western Gateway should not replace Erith town

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centre. This approach is likely to generate positive effects for townscapes and open spaces.

- The guidance seeks the provision of social infrastructure (healthcare, emergency and essential services) and cultural infrastructure (theatre, visual and performing arts, museums and galleries, archives, libraries, architecture and design, public spaces and places of heritage, tourism, media, film and television and sports and leisure). This approach has the potential to be positive for spatial efficiency.
- The brief seeks the development of brownfield land, which will be positive for land, water and soil resources. It also provides for flood prevention and the management of flood risk, particularly from the river Thames.
- The guidance seeks the provision of new and improve business premises and community uses, which has the potential to be positive for economic growth, employment and investment.

There is considered to be a significant level of uncertainty around whether the framework will be delivered due to its non-regulatory nature. In addition, the framework has been in place for a number of years without being successfully implemented and there is a possibility that it will be seen as dated, which increases the likelihood that it will not be delivered.

Notwithstanding this uncertainty, development in line with the EDAW framework has the potential to deliver development in line with the vision, which will deliver significant positive effects on the townscape and open spaces, quality of surroundings and for climate change adaptation and mitigation.

Development in line with the EDAW framework has the potential to assist with the delivery of the vision for the Erith geographic region as outlined in the Proposed Submission Core Strategy. The uncertainty and time elapsed since the document was delivered has resulted in Option E being discounted as an option for the future development of the Erith Western Gateway.

4.7 Selection of preferred option

Option B – Develop and adopt a Supplementary Planning Document using the Maccreeanor Lavington Development Framework as its basis has been selected as the preferred option. This is because this option provides for development based on a contemporary development framework, with guidance provided and incorporated to the borough's development plan through a Supplementary Planning Document. When considering this option through the sustainability appraisal, it was considered to generate a number of positive and major positive effects, particularly on landscapes townscapes and open spaces and on the quality of surroundings. Uncertainties that were identified were dependent on the type of development that is likely to come forward on the site, and are capable of being overcome through individual planning applications for future development.

Option A – 'Do Nothing', presents the current baseline situation for the Erith Western Gateway and is therefore considered to be the 'nil effects' situation. As Options B, C, D and E all present options that have the potential to generate positive effects over and above the baseline, this option has been discounted.

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Option C provides for an outline planning application based on the Maccreeanor Lavington Development Framework. This option also has the potential to deliver a range of positive and major positive effects when evaluated against the sustainability appraisal objectives, but significant uncertainty was introduced through this approach as any deviation from the development proposal as approved could potentially result in a new planning application being required, and the form and type of development envisaged not being provided for in the alternative planning application. This uncertainty has resulted in Option C being discounted.

Options D – Maccreeanor Lavington Development Framework not formally adopted but acknowledged as being potentially helpful as guidance, and Option E – EDAW framework (developed as part of 2007 marketing of the site) not formally adopted but acknowledged as being potentially helpful as guidance were both also considered to lead to a range of positive and major positive effects, particularly on landscapes townscapes and open spaces, and on the quality of surroundings. The sustainability appraisal identified significant uncertainties around these options however, owing to the guidance not forming part of the Local Development Framework for the borough and this introduces the potential for the guidance to be overlooked by prospective developers, particularly as the guidance becomes dated. This increases the likelihood that the positive effects anticipated not being realised, and as a consequence both of these options were discounted.

Chapter 5: Conclusions

5.1 Key findings from the Sustainability Appraisal / Strategic Environmental Assessment

The sustainability appraisal of the Erith Western Gateway SPD was undertaken as an iterative process, with the appraisal utilised to select the preferred option and feeding into the development and refinement of the emerging SPD. A commentary on the sustainability appraisal feedback on the various options and the selection of the preferred option is provided in Chapter 4 of this report. As a consequence, the sustainability appraisal has influenced the development of the Erith Western Gateway SPD and its influence is evident in the broad approach taken to the guidance and its key themes.

Overall, the assessment of the Erith Western Gateway SPD has found it to be broadly positive when considered against the 19 sustainability appraisal objectives. Some of the key strengths of the SPD include:

- The SPD seeks to deliver a network of residential streets that provide direct, safe and enjoyable pedestrian links between the town centre, the river Thames and the station, and to create and improve pedestrian and cycle links.
- The SPD facilitates the potential redevelopment of the Walnut Tree depot site for education and commercial use.
- The SPD provides for the development of up to 340 new homes, with flexibility provided around the retention or re-provision of housing in the Orbit towers.
- The SPD seeks to create a new cohesive community with improved living environments and the potential for improved leisure opportunities, including an improved public realm.
- The SPD seeks to create a community focal point at Riverside Gardens and ensure wildlife habitats and biodiversity are protected, enhanced and promoted through the new development.
- The SPD seeks to ensure that new development incorporates a range of measures to minimise resource consumption, encourage green lifestyles and improve environmental quality.
- The SPD provides a positive opportunity to enhance the conservation area at riverside gardens, whilst ensuring that development does not adversely impact on it.
- The SPD seeks to combine fully integrated flood defences into the redevelopment of the Riverside Gardens to ensure that they do not dominate the open space, and integrate flood defences, sustainable urban drainage systems and water saving measures into new development to positively manage and mitigate flood risk.
- The SPD will assist to reduce the extent of vacant land and the number of vacant buildings, minimise resource use and increase the provision of key services and facilities.
- The SPD will assist to recreate the Erith High Street and provide for commercial uses totalling 16,000sqm of floor space that can be used for a variety of uses or applied flexibly, so if insufficient demand exists then the units can be converted to other uses, including residential.

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It is recognised however that the SPD provides strategic guidance, and as such specific development projects (such as individual new buildings, homes or developments) may give rise to a variety of effects that could be potentially positive or negative. These effects may occur as a result of individual developments, or cumulatively alongside other developments.

Negative effects that could occur as a result of development could include a strain on natural resources or infrastructure, pressure to build on areas susceptible to flood risk, or poorly design development that does not contribute to enhancing the character of the Erith Western Gateway or the wider Erith geographic region. Clear guidance is set out in the SPD to minimise the risk of this however, and the assessment of individual proposals, including, where appropriate use of the environmental impact assessment (EIA) process is likely to assist to minimise this risk.

Therefore, it can be concluded that as far as this SPD can influence, no significant adverse effects are anticipated to occur as a result of the Erith Western Gateway Development Framework SPD. However, as there is uncertainty as to how the guidance could be implemented in future development, it is important that an effective monitoring regime is developed to review the impacts and effectiveness of the document against the sustainability appraisal objectives over time.

5.2 Monitoring

It is a requirement of the Strategic Environmental Assessment Directive to establish how the significant effects of the implementation of the Core Strategy will be monitored. However, as the OPDM Guidance (2005) notes, *'it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focussed on significant sustainability effects.'*

The monitoring undertaken should therefore be focussed on significant effects that may arise and potentially give rise to irreversible damage, with a view to identifying trends before such damage is caused. It should also focus on uncertain effects where monitoring would enable preventative or mitigation measures to be undertaken. The significant effects indicators identified for the Proposed Submission Core Strategy have been used as a basis for consideration of additional significant effects indicators to monitor the SPD. The London Borough of Bexley also monitors a significant number of indicators to provide detail on its various policies, which can also be used to monitor the effects of the implementation of the Erith Western Gateway Development Framework SPD from a sustainability perspective.

In order to consider their fit, these measures have been divided into the following categories:

INDICATOR TYPE	INDICATORS
Core Output (COI)	Indicators set by central government
Local Output (LOI)	Indicators set out in the Unitary Development Plan to monitor information. These indicators need to be reviewed and/or updated to reflect the Local Development Framework (LDF) policies and implementation.

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INDICATOR TYPE	INDICATORS
Significant Effects (SEI)	Indicators set out in Sustainability Appraisal Reports that form part of LDF documents.
Town Centre Key (TCK)	Key indicators of Planning Policy Statement 4 Town Centre Health Checks (carried forward from PPS6)
National (NI)	Performance indicators agreed through Bexley's Local Area Agreement.

These indicators are published and made available by the London Borough of Bexley annually, either through corporate level reporting of Bexley's Annual Monitoring Report. To identify which existing indicators are appropriate to monitor the effects of the Erith Western Gateway Development Framework SPD on the sustainability appraisal objectives, consideration has been carried out of each sustainability appraisal objective and what information would be most useful to measure its effectiveness, tied into the key sustainability issues.

An evaluation has then been carried out of what existing measures can be used to monitor the effectiveness of the Erith Western Gateway Development Framework SPD in this regard, and where there are no appropriate measures, a new Significant Effects Indicator is proposed, which will be monitored through the Annual Monitoring Report. The basis for this evaluation was that carried out for the Proposed Submission Core Strategy, and additional indicators have been suggested only where there is a need for additional monitoring specifically relating to the Erith Western Gateway. The evaluation for each sustainability appraisal objective is summarised in Appendix H.

It is noted that on 13 October 2010, the government revoked all designations of local improvement targets in Local Area Agreements, effectively handing over control of the associated National Indicator targets and performance monitoring to local authorities. The National Indicators listed in Appendix H will therefore be subject to future review, but are currently being utilised for monitoring until such times as a new indicator set is agreed. The government further announced its intentions to replace the National Indicator set with a single list of data that local authorities will be expected to provide to central government in due course. It is likely that the full complement of monitors for the Local Development Framework will need to be reviewed and/or revised in order to reflect changing circumstances and requirements.

The proposed significant effects indicator identified to monitor the impacts of the Erith Western Gateway Development Framework SPD is outlined in Table 5.1 below.

Proposed Significant Effects Indicators to Monitor the Sustainability Impacts of the Erith Western Gateway Development Framework SPD
SEI EWG01 – Progress toward the implementation of development at the Erith Western Gateway.

Table 5.1: Proposed Significant Effects Indicator

5.3 Quality assurance

A quality assurance checklist has been prepared and is included as Appendix H, highlighting compliance with the Strategic Environmental Assessment Directive.

5.4 Next steps

This sustainability appraisal report is issued for consultation alongside the draft Erith Western Gateway Development Framework SPD. Consultation will last for six weeks, from **24 January** to **4 March 2011**. Following receipt of comments on the plan and the sustainability appraisal report, changes will be made as necessary, and the SPD will be recommended for formal adoption into the Local Development Framework.

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