

# Sustainability Appraisal Report

## Bexley Sustainable Design & Construction Guide

*Adopted*  
29 October 2007



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# Summary and Outcomes 1

## Non-technical summary

- 1.1 This Sustainability Appraisal Report has been prepared for the *Sustainable Design & Construction Guide Supplementary Planning Document (SPD)*. This SPD will form a part of Bexley Council's Local Development Framework (LDF). Once adopted, the SPD will ensure that future developments in Bexley meet the highest standards of sustainable design and construction.
- 1.2 Sustainability Appraisal attempts to predict and highlight the significant effects of implementing the SPD and suggest ways to reduce negative effects, create or enhance positive effects, and to make predicted effects more certain. Effects have been considered in reference to the social, environmental and economic baseline and the likely future situation from identified trends.
- 1.3 This Sustainability Appraisal has found that implementing the SPD should generally have a major positive effects in the short to long term on the local community, environment and economy. However, there is also some uncertainty associated with the effects on social, environmental and economic areas for some of the SPD principles.
- 1.4 To try and reduce some of the uncertainties and improve outcomes, recommendations on the draft SPD were made and implemented during the drafting of the SPD. Further recommendations are contained in this Report.

## The likely effects of the Plan

- 1.5 The effects of implementing the SPD are generally very positive in the short to long term when considered against the Sustainability Appraisal objectives. They have been identified for the following SPD principles:
  - Ensuring access and protection of the natural environment
  - Reducing negative impact of development on the local environment
  - Conserving resources and reducing carbon emissions
  - Ensuring comfort and security in and around the development
  - Encouraging sustainable living through building design and information provision
  - The sustainable design and construction matrix

## The difference the process has made to date

- 1.6 The Sustainability Appraisal process has informed the development of the *Sustainable Design & Construction Guide SPD*. During drafting of the SPD for consultation and prior to adoption many suggestions / recommendations from the Sustainability Appraisal to improve sustainable development outcomes of the SPD have been implemented.
- 1.7 This Sustainability Appraisal Report includes recommendations that would help to further improve the sustainability performance of the SPD or its implementation that were not incorporated. These are listed in 7 'Implementation'.
- 1.8 The ultimate effectiveness of the SPD in sustainable development terms will depend on an effective partnership between London Borough of Bexley, prospective developers and the community.

## 2 Background

### The purpose of Sustainability Appraisal and the Sustainability Appraisal Report

- 2.1** Sustainable development is central to the reformed planning system and Government policy. *Securing the Future: Delivering the UK Sustainable Development Strategy* (Her Majesty's 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."
- 2.2** The Strategy identifies a set of UK principles to be used to achieve sustainable development:
- Living within environmental limits;
  - Ensuring a strong, healthy and just society;
  - Achieving a sustainable economy;
  - Promoting good governance; and
  - Using sound science responsibly.
- 2.3** Priority areas for immediate action in the Strategy are:
- Sustainable consumption and production;
  - Climate change and energy;
  - Natural resource protection and environmental enhancement; and
  - Creating sustainable communities and a fairer world.
- 2.4** 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 - key to achieving sustainable development.
- 2.5** 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 Supplementary Planning Documents (SPDs). 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 drawing up policies.

### Strategic Environmental Assessment and Sustainability Appraisal

- 2.6** Sustainability Appraisal is mandatory for planning documents under the requirements of the *Planning and Compulsory Purchase Act 2004*. However, the European Directive 2001/42/EC on 'the assessment of the effects of certain plans and programmes on the environment,' known as the *Strategic Environmental Assessment Directive*, must also be met.
- 2.7** Under the requirements of the *Strategic Environmental Assessment Directive*, specific types of plan must be subject to a Strategic Environmental Assessment (SEA). This involves the systematic identification and evaluation of environmental consequences of implementing plans and policies. The *Strategic Environmental Assessment Directive* came into effect on 21 July 2004 and applies to preparing new or revised DPDs and SPDs as well as to a range of other plans.
- 2.8** SEA is focused primarily on environmental effects, while Sustainability Appraisal considers all sustainability-related effects - social, environmental and economic.
- 2.9** The key output of SEA is an Environmental Report that describes the environmental assessment process and likely significant effects of the plan and reasonable plan options. The output of Sustainability Appraisal is a Sustainability Appraisal Report that encompasses the above information and also covers other effects apart from those only affecting the environment.

- 2.10** The requirements to undertake a Sustainability Appraisal and SEA are distinct. However, the Government's approach has been to satisfy both requirements through a single appraisal process. In November 2005, the Office of the Deputy Prime Minister published *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*, setting out a clear process for undertaking a Sustainability Appraisal (which fulfils the requirements for SEA) as it applies to DPDs and SPDs. This guidance will be referred to as the 'Sustainability Appraisal Guidance' within this report.
- 2.11** A summary of the *Strategic Environmental Assessment Directive* requirements for the preparation of an environmental report (as listed in Annex I of the Directive), and where they are addressed in this Sustainability Appraisal Report, are shown in **Table 2.1**.

The SEA Directive's Requirements	Where covered in this Report
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2, paragraphs 2.12-2.14 Chapter 4, paragraphs 4.1-4.4 Appendix A
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 4, paragraphs 4.5-4.13 Appendices B, C, D & E
The environmental characteristics of areas likely to be significantly affected.	Chapter 4, paragraphs 4.5-4.13 Appendices B, C, D & E
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Birds Directive) and 92/43/EEC (Habitats Directive).	Chapter 4, paragraphs 4.14-4.15 Appendix F
The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Chapter 4, paragraphs 4.1-4.4 Appendix A
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Chapter 5, paragraphs 5.1-5.18 Chapter 6, paragraphs 6.1-6.38 Appendices G, H & I
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapter 7, paragraphs 7.1-7.8

## 2 Background

The SEA Directive's Requirements	Where covered in this Report
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the report.	Chapter 3 paragraph 3.19 Chapter 5, paragraphs 5.1-5.18 Chapter 6 paragraphs 6.1-6.38 Appendices F, G, H & I
A description of measures envisaged concerning monitoring in accordance with Article 10.	Chapter 7, paragraphs 7.9-7.12 Appendix F
A non-technical summary of the information provided under the above headings.	Chapter 1, paragraphs 1.1-1.4

Table 2.1 Strategic Environmental Assessment Directive Requirements of Sustainability Appraisal

### The Supplementary Planning Document (SPD)

**2.12** The purpose of the *Sustainable Design & Construction Guide SPD* is to ensure that future developments in Bexley meet the highest standards of sustainable design and construction. This means creating developments that are more cost effective to run, more secure, minimise their environmental impact and provide healthy living conditions, at the same time as respecting the area's rich heritage and distinctiveness.

**2.13** The SPD has been prepared to supplement the policies and proposals of the saved Bexley *Unitary Development Plan* (UDP) 2004 and the *London Plan* 2004, which together form the development plan for the area. It will be a material consideration when the Council considers planning applications.

**2.14** The *Sustainable Design & Construction Guide SPD* covers the following principles:

- Ensuring land is safe for development
- Ensuring access to and protection of the natural environment
- Reducing negative impact of development on the local environment
- Conserving resources and reducing carbon emissions
- Ensuring comfort and security in and around the development
- Minimising the adverse effects of the construction process on site and surroundings
- Encouraging sustainable living through building design and information provision.

### The structure of this Sustainability Appraisal Report

**2.15** This Sustainability Appraisal Report is divided into four main sections.

- Section 1 – contains introductory information including the non-technical summary.
- Section 2 – contains the background information to support the Sustainability Appraisal.
- Section 3 – contains details on the assessment of the plan.
- Section 4 – suggests mitigation and monitoring for the Supplementary Planning Document.

### Approach adopted to the sustainability appraisal

- 3.1** The approach to the Sustainability Appraisal for the *Sustainable Design & Construction Guide Supplementary Planning Document (SPD)* follows the process set out in Figure 9 of the Sustainability Appraisal Guidance.
- 3.2** The Sustainability Appraisal Guidance presents a five-stage approach for undertaking a Sustainability Appraisal that also incorporates the SPD process as shown in **Table 3.1**.

Supplementary Planning Document Stage 1: Pre-production – Evidence Gathering	
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope.
Supplementary Planning Document Stage 2: Production – Prepare Draft Supplementary Planning Document	
Stage B	Developing and refining options and assessing effects.
Stage C	Preparing the Sustainability Appraisal Report.
Stage D	Consulting on the draft Supplementary Planning Document and Sustainability Appraisal Report.
Supplementary Planning Document Stage 3: Adoption	
Stage E	Monitoring the significant effects of implementing the Supplementary Planning Document.

Table 3.1 Incorporating the Sustainability Appraisal into the SPD Process

- 3.3** This Sustainability Appraisal Report sets out the findings of Stages B and C in the process. Stages B and C comprise of seven tasks as shown in **Table 3.2**.

Stage B: Developing and refining options and assessing effects	
Task B1	Testing the Supplementary Planning Document objectives against the sustainability appraisal framework.
Task B2	Developing the Supplementary Planning Document options.
Task B3	Predicting the effects of the draft Supplementary Planning Document.
Task B4	Evaluating the effects of the draft Supplementary Planning Document.
Task B5	Considering ways of mitigating adverse effects and maximising beneficial effects.
Task B6	Proposing measures to monitor the significant effects of implementing the Supplementary Planning Document.
Stage C: Preparing the Sustainability Appraisal Report	
Task C1	Preparing the Sustainability Appraisal Report.

Table 3.2 Sustainability Appraisal Stage B and C Tasks

- 3.4** Following formal public consultation, the subsequent phases of the Sustainability Appraisal relate to the completion of stages D and E of the Sustainability Appraisal Process. An outline of those remaining stages and tasks of the Sustainability Appraisal are shown in **Table 3.3**.

## 3 Appraisal Methodology

<b>Stage D: Consulting on the draft Supplementary Planning Document and Sustainability Appraisal Report</b>	
Task D1	Public participation on the Sustainability Appraisal Report and the draft Supplementary Planning Document.
Task D2	Assessing significant changes.
<b>Supplementary Planning Document Stage 3: Adoption</b>	
Task D3	Making decisions and providing information.
<b>Stage E: Monitoring the significant effects of implementing the Supplementary Planning Document</b>	
Task E1	Finalising aims and methods for monitoring.
Task E2	Responding to adverse effects.

Table 3.3 Sustainability Appraisal Stages D and E

### When the sustainability appraisal was carried out

- 3.5** The Sustainability Appraisal for the draft *Sustainable Design & Construction Guide SPD* was carried out from June 2006 to October 2007.
- 3.6** Stage A was carried out and documented in the *Sustainability Appraisal Scoping Report for the Sustainable Design & Construction Guide, Bexleyheath Civic Offices Planning Brief and Lamorbey Swimming Centre Planning Brief SPDs*. Consultation was undertaken on this Scoping Report for five weeks from **11 September to 16 October 2006**. Consultation on the Scoping Report is required by the Strategic Environmental Assessment (SEA) Regulations.
- 3.7** Stages B and C, a key output of the appraisal process, presenting information on the effects of the draft SPD for formal public consultation for Stage D were documented in the *Sustainability Appraisal Report Sustainable Design & Construction Guide SPD for Consultation*. Consultation was undertaken on this Sustainability Appraisal Report for 6 weeks from **2 April to 14 May, 2007**. Consultation on the draft SPD and Sustainability Appraisal Report is required by the Local Development Regulations.
- 3.8** Amendments to finalise this Sustainability Appraisal Report were undertaken between July and October 2007.

### Who carried out the sustainability appraisal

- 3.9** It is the responsibility of the Local Planning Authority to make sure a Sustainability Appraisal Report has been carried out in accordance with the *Strategic Environmental Assessment Directive*, the *Planning and Compulsory Purchase Act 2004* and the *Environmental Assessment of Plans and Programmes Regulations 2004*.
- 3.10** The Council chose to engage a contract staff member from outside the organisation to undertake the Sustainability Appraisal to contribute expertise and a detached and independent view.

### Who was consulted, when and how

- 3.11** As mentioned previously, the *Sustainability Appraisal Scoping Report* was consulted upon from **11 September to 16 October 2006**, as required by the SEA Regulations.

# Appraisal Methodology 3

- 3.12** The consultees were provided with hard copies of the Scoping Report. Consultees included the four statutory environmental consultation bodies - Countryside Agency, English Heritage, English Nature and the Environment Agency, as required by the *Strategic Environmental Assessment Directive*. Other consultees were the Greater London Authority and Government Office for London. Comments were received from English Heritage, Environment Agency, Government Office for London and Natural England (Natural England has been formed bringing together English Nature and elements of the Countryside Agency). Their suggested changes, such as consideration to further policies, additional baseline information, consideration of further issues and changes to the Sustainability Appraisal framework have been integrated into this Report.
- 3.13** The draft SPD and Sustainability Appraisal Report were made available for formal public consultation at the same time for a six week consultation from **2 April to 14 May, 2007**, as required by the Local Development Regulations.
- 3.14** The statutory consultation bodies were provided with hard copies of the draft SPD, Sustainability Appraisal Report and Appendices. The three statutory environmental consultation bodies - English Heritage, Environment Agency and Natural England. Other consultees were the Greater London Authority and Government Office for London.
- 3.15** Hard copies of the draft SPD, Sustainability Appraisal Report and Appendices were made available at Bexley Council Offices and Libraries for public viewing. Hard copies of the draft SPD and Sustainability Appraisal Report were sent to stakeholders and developers, together with advice on how and by when to comment and where the full documentation could be viewed.
- 3.16** Relevant stakeholders received letter notifications informing them that the draft documents could be viewed online on the Bexley Council website, hard copies were available on request or could be viewed at Bexley Council Offices and Libraries. The letters included advice on how and by when to comment.
- 3.17** Public notices in the press and Council press releases were also used to notify residents that the draft documents were available for consultation and how they could access them. The Council's website included links to the documents (on the Development Plan page) from other pages, ie., Consultations and News.
- 3.18** Representations that were received on the draft Sustainability Appraisal Report are presented in **Table 3.4** below. All representations were from **Natural England (NE)**.

Report section	Representation	Bexley Council response
Table 4.1: Policies, Plans, Programmes and Sustainable Development Objectives	There are good and appropriate links to relevant policies and plans such as The London Plan, PPS 9, Mayor's Biodiversity Strategy, Design for Biodiversity, as well the Borough Biodiversity Action Plan (BAP) and Local Implementation Plan (LIP) documents. However, there appears to be no mention of either PPS 2 Green Belts or PPG 17 Open Space, which will need to be considered, or clarification as to their omission.	Amendments have been made and consideration given to the documents mentioned.
Table 4.2: Sustainable Design and Construction Key Sustainability Issues - General	This table lists seventeen issues under social, environmental and economic headings, which can be broadly supported.	Noted.

### 3 Appraisal Methodology

Report section	Representation	Bexley Council response
Table 4.2: Sustainable Design and Construction Key Sustainability Issues - Social	Under this section, access to essential services includes open space, reiterating the Council's recognition of the role and benefits that open spaces can have in respect of health and this is to be welcomed. Adequate access to public transport, ease of movement and safety is also included under social and as such is welcomed and commended also.	Noted.
Table 4.2: Sustainable Design and Construction Key Sustainability Issues - Environmental	This section includes an issue relating to the protection and enhancement of species and habitats, especially those targeted for improvement in the Bexley BAP, which is welcomed and supported. The issue relating to reducing carbon dioxide emissions, which is a major contributor to climate change, is also welcomed, as is the issue covering the maintenance and enhancement of the quality of open spaces, landscapes and townscapes.	Noted.
Table 5.1: Summary of Options Appraisal	This table lists eighteen objectives, which are broadly supported by Natural England, and in particular the following: Objective 8 - Biodiversity Objective 9 - Climate change Objective 12 - Landscapes & townscapes - as this includes open spaces Objective 14 - Transport.	Noted.
Paragraphs 7.9 & 7.10	Monitoring through the Annual Monitoring Report is also welcomed and should enable the Borough to build up appropriate data for the area, and is similar to other Boroughs' monitoring procedures.	Noted.
Appendix B: Social Baseline	Appendix B includes "Access to Public Open Spaces" under the social baseline - health, again this connection between open spaces and health is to be welcomed.	Noted.
Appendix D: Environmental Baseline	Appendix D Environmental baseline includes a proposition from the Council to prepare PTAL (Passenger Transport Accessibility Level) maps for the whole borough, and is to be commended allowing as it will the identification of areas deficient in public transport and the targeting of resources.	This requires further investigation as to whether the Borough is able to produce such maps. In the meantime it is proposed that the PTAL map produced by Transport for London and other transport maps prepared for the Borough LIP can be used and referred to.

Table 3.4 Draft Sustainability Appraisal Report Representations

**Difficulties encountered in compiling information or carrying out the assessment**

- 3.19** The availability of baseline information and suggestions for monitoring indicators for topics such as biodiversity, climate change, economic growth and investment making assumptions about underlying trends and prediction of future baseline for indicators in cases where there is limited baseline information available has been difficult.

## 4 Sustainability Objectives, Baseline and Context

### Links to other policies, plans and programmes and sustainability objectives and how these have been taken into account

- 4.1** To establish the context for the preparation of the Supplementary Planning Document (SPD), a review of other relevant policies, plans programmes and sustainable development objectives that may influence its preparation is required.
- 4.2** The *Strategic Environmental Assessment Directive* requires environmental protection objectives established at International, European Community or National levels to be taken into account.
- 4.3** The plans and programmes reviewed and that are relevant to the *Sustainable Design & Construction Guide SPD* are listed below in **Table 4.1**. A review summary shows how the plans and programmes listed were considered and documented and is available in **Appendix A**.

Document	Reference
<b>International</b>	
1	Water Framework Directive (2000/60/EC)
<b>National</b>	
2	Securing the Future – UK Government Sustainable Development Strategy (2005)
3	Climate Change – The UK Programme (2006)
4	Meeting the Energy Challenge: A White Paper on Energy (2007)
5	National Community Safety Plan 2006-2009 (2005)
6	Consultation Draft - Making Space for Water: Developing a New Government Strategy for Flood and Coastal Erosion Risk Management in England (2004). First Government Response to Consultation Draft - Making Space for Water: Taking Forward a New Government Strategy for Flood & Coastal Erosion Risk Management (2005)
7	Biodiversity by Design (2004)
8	Planning Policy Statement 1: Delivering Sustainable Development (2005). Consultation draft – Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1 (2006)
9	Planning Policy Statement 2: Green Belts (2001)
10	Planning Policy Statement 3: Housing (2006)
11	Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)
12	Planning Policy Statement 10: Planning for Sustainable Waste Management (2005)
13	Planning Policy Guidance 15: Planning and the Historic Environment (2002)
14	Planning Policy Guidance 16: Archaeology and Planning (2001)
15	Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation (2002)
16	Planning Policy Statement 22: Renewable Energy (2004)
17	Planning Policy Statement 23: Planning and Pollution Control (2004)
18	Planning Policy Guidance 24: Planning and Noise (2001)

## Sustainability Objectives, Baseline and Context 4

Document	Reference
19	Planning Policy Statement 25: Development and Flood Risk (2006)
<b>Regional / London</b>	
20	The London Plan: Spatial Development Strategy for Greater London (2004)
21	Draft – Early Alterations to the London Plan (2005)
22	Draft – Further Alterations to the London Plan (2006)
23	The London Plan Supplementary Planning Guidance – Sustainable Design & Construction (2006)
24	The Mayor's Air Quality Strategy 'Cleaning London's Air' (2002)
25	The Mayor's Ambient Noise Strategy 'Sounder City' (2004)
26	The Mayor's Biodiversity Strategy 'Connecting with London's Nature' (2002)
27	The Mayor's Energy Strategy 'Green Light to Clean Power' (2004)
28	The Mayor's Municipal Waste Management Strategy 'Rethinking Rubbish in London' (2003)
29	Strategic Flood Risk Assessment of East London (2005)
30	Design for Biodiversity: A Guidance Document for Development in London (not dated)
<b>Local / Borough</b>	
31	Bexley's Community Strategy – Our Vision for Bexley 2003-2013 (2003)
32	Bexley Council Unitary Development Plan (adopted 2004)
33	Design for Living: Bexley's Residential Design Guide Supplementary Planning Document (adopted 2006)
34	Bexley's Biodiversity Action Plan (2002)
35	Local Agenda 21 Strategy (1999)
36	Updating and Screening Assessment of Local Air Quality in the London Borough of Bexley (2004)
37	Local Implementation Plan 2005/06 to 2010/11 (2006)
38	Bexley Community Safety Strategy 2005–2008 (2005)
39	Sustainable Energy Strategy (2001)
40	Waste Minimisation and Recycling Plan 1999 – 2004
41	Consultative Draft – “Knowing Bexley” Economic & Employment Development Strategy for London Borough of Bexley (2005)

Table 4.1 Policies, Plans, Programmes and Sustainable Development Objectives

- 4.4** The objectives of the planning policy statements, the Mayor's *London Plan* and supporting guidance on sustainable design and construction, and relevant saved policies of the *Unitary Development Plan* (UDP) are the key documents providing the context for this SPD.

## 4 Sustainability Objectives, Baseline and Context

### Description of the social, environmental and economic baseline characteristics and the predicted future baseline

- 4.5** The collection of baseline information provides the basis for predicting and monitoring effects, helps identify key sustainability issues and forms the basis for the indicators of change. The identification of sustainability issues assists in the compilation of the Sustainability Appraisal objectives. Information about the current and likely future state of the environment needs to be collected in order to allow the effects of the SPD to be predicted.
- 4.6** The *Strategic Environmental Assessment Directive* requires information to be collected on “relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan” and “the environmental characteristics of the areas likely to be significantly affected.”
- 4.7** For this SPD, baseline information has been collected and relates to the geographic area of Bexley Borough as shown in **Map 4.1**.



Map 4.1 London Borough of Bexley context

- 4.8** Baseline information relevant to the *Sustainable Design & Construction Guide SPD* is provided in Appendices B, C, D and E.

# Sustainability Objectives, Baseline and Context 4

## Data gaps and limitations of baseline information

- 4.9** The baseline information that has been gathered to date and during the Sustainability Appraisal scoping stage for the Core Strategy contains a broad range of data to assist with evaluating Bexley's current and future sustainability baseline.
- 4.10** This is work in progress and will be continually updated as further information becomes available. This data represents a broad base for the Sustainability Appraisal to give an indication that implementing the Supplementary Planning Document will deliver sustainable development. The indicators that are contained in the baseline information represent areas where there are concerns, where improvements are required, and also areas where the Borough is performing well. The baseline information also highlights data gaps that require further investigation or have been identified as useful for Sustainability Appraisal purposes, however they are proposed to be used at implementation of the plan. Investigation of suitable indicators will be an ongoing process.
- 4.11** Limitations of the data and any difficulties encountered in gathering appropriate data at the level of detail required of the Sustainability Appraisal Guidance include:
- Baseline information has been gathered from a wide range of Council Departments and on many occasions has relied on the goodwill of Officers to provide this information in a timely fashion – there is no central database
  - A number of existing data gaps require investigation to determine whether information at an appropriate level of detail can be gathered or would be an appropriate measure at the Borough / local level for a Sustainability Appraisal objective
  - The influence of external factors in predicting future trends.
- 4.12** Please see **Appendices B, D, E and F**.

## Current and likely future situation

- 4.13** The current and likely future situation of baseline information relevant to the *Sustainable Design & Construction Guide SPD* is provided in **Appendices B, C, D and E**.

## Main social, environmental and economic issues and problems identified

- 4.14** This task of the Sustainability Appraisal identifies the key sustainability issues affecting the SPD - including environmental problems as required by the *Strategic Environmental Assessment Directive*.
- 4.15** Considering the baseline information and trends, where available, the key sustainability issues identified for the *Sustainable Design & Construction Guide SPD* are summarised in **Table 4.2**. Please see **Appendix F** for the key sustainability issues, opportunities and relationship to Sustainability Appraisal objectives.

## 4 Sustainability Objectives, Baseline and Context

Key Issues and Problems	Source
<b>Social</b>	
Provision of and access to essential services including open space.	Strategic Planning and Development – review of baseline information
Adequate access to public transport, ease of movement and safety.	Bexley Local Implementation Plan – review of other plans and programmes
Fuel poverty.	Bexley Council Energy Conservation Team – personal comments
Deprivation, exclusion and inequalities and disparities that exist within the borough for example, health, crime, income and employment.	Index of Multiple Deprivation 2004 – review of baseline information
Crime levels and fear of crime.	Bexley Crime and Disorder Audit 2004 – review of baseline information; Bexley Performance Plan 2006/07 – review of baseline information
<b>Environmental</b>	
Poor air quality and the declaration of a whole of Borough Air Quality Management Area.	Air Quality Management Variation Order 2007 – review of baseline information; London Air Quality Network – review of baseline information
Protect and enhance species and habitats especially those targeted for improvement in the Bexley Biodiversity Action Plan.	Biodiversity Action Plan 2002 - review of other plans and programmes
Need to reduce carbon dioxide emissions – a significant contributor to climate change.	London Atmospheric Emissions Inventory 2003 and Report 2006, Greater London Authority – review of baseline information
Risk of tidal, fluvial and sewerage flooding.	Environment Agency - review of baseline information
Maintain and enhance the quality of open spaces, landscapes and townscapes.	Bexley Performance Plan 2006/07 – review of baseline information
Need to preserve and enhance built heritage and historic and archaeological environment.	Bexley's Community Strategy – Our Vision for Bexley 2003-2013 – review of other plans and programmes
Need to improve the quality of land.	Local Agenda 21 Strategy – review of other plans and programmes
Need to improve water quality – a risk of groundwater contamination.	Environment Agency – review of baseline information
High water consumption.	Thames Water – review of baseline information
High car ownership (47%) including high use and dependence on the car. Low use of sustainable modes of transport.	Bexley Local Implementation Plan – review of other plans and programmes
High domestic waste production and need for recycling and waste minimisation.	Bexley Performance Plan 2006/07 – review of baseline information

## Sustainability Objectives, Baseline and Context 4

Key Issues and Problems	Source
<b>Economic</b>	
Perceptions that incorporating sustainability features into a development will greatly increase the costs of a building project.	Strategic Planning and Development – review of baseline information

Table 4.2 Sustainable Design and Construction Guide Key Sustainability Issues

**The sustainability appraisal framework, including objectives, targets and indicators**

- 4.16** The Sustainability Appraisal framework provides a way in which sustainability effects can be described, analysed and compared. It is central to the Sustainability Appraisal process.
- 4.17** The Sustainability Appraisal framework consists of objectives, which, may be expressed in the form of targets, the achievement of which should be measurable using identified indicators.
- 4.18** The development of the Sustainability Appraisal framework was based on the framework developed and consulted upon for the *Core Strategy*. However, it was recognised that changes to criteria / sub-objectives could be necessary to the existing Sustainability Appraisal framework to tailor to the SPD.
- 4.19** As a result of consultation on the *Sustainability Appraisal Scoping Report for the Sustainable Design and Construction, Bexleyheath Civic Offices Planning Brief and Lamorbey Swimming Centre Planning Brief SPDs*, an additional Sustainability Appraisal objective was created and adjustments made to the criteria / sub-objectives for the Sustainability Appraisal framework to tailor to this SPD.
- 4.20** **Appendix F** presents the Sustainability Appraisal framework developed for this appraisal.

## 5 Plan Issues and Options

### Task B1 - Testing the SPD objectives against the sustainability appraisal framework

- 5.1 It is important for the objectives of the SPD to be in accordance with sustainability principles. The objectives have been tested for compatibility with the Sustainability Appraisal objectives. The assessment matrix is presented in **Appendix G**.
- 5.2 The result of the assessment indicated that in general the objectives are compatible with each other. The assessment demonstrates that both sets of objectives have similarities.
- 5.3 Overall, the *Sustainable Design & Construction Guide SPD* objective should contribute to creating developments that more cost effective to run, more secure, minimise their environmental impact and provide healthy living conditions, at the same time as respecting the area's rich heritage and distinctiveness.

### Task B2 - Developing the SPD options

- 5.4 The Guidance recommends that the Local Planning Authority appraise in broad terms the effects of strategic options and then in more detail the effects of preferred options once selected.
- 5.5 The *Strategic Environmental Assessment Directive* requires preparation of an environmental report containing "the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated" and "an outline of the reasons for selecting the alternatives dealt with."

### Main strategic options considered and how they were identified

- 5.6 The London Borough of Bexley wants to work in cooperation with developers to achieve the highest possible standards of sustainable design and construction. Working together to create developments that are more cost effective to run, more secure, minimise their environmental impact and provide healthy living conditions, at the same time as respecting the area's rich heritage and distinctiveness.
- 5.7 An option was to produce a Supplementary Planning Document (SPD) on sustainable design and construction to guide new development in Bexley aimed at developers and those seeking planning permission - Option A.
- 5.8 Given the duty under the *Planning and Compulsory Purchase Act 2004* on those preparing a SPD to contribute to sustainable development, it is essential to improve on the situation that would exist if there were no SPD. The no SPD option - to rely on the saved Unitary Development Plan (UDP) Policies was considered as Option B.
- 5.9 Two options were considered:
  - Option A – Develop a SPD to guide developers those in the design and construction of developments to achieve the highest possible standards of design and construction.
  - Option B – No SPD - rely on the saved UDP policies.

### Comparison of the social, environmental and economic effects of the options

- 5.10 The two options were compared against the Sustainability Appraisal objectives as detailed in **Appendix F**. The anticipated effect was predicted and includes comments on the likely impact

## Plan Issues and Options 5

on the Sustainability Appraisal objectives as found in **Appendix H. Table 5.1** shows a summary of the results. Information used to undertake the appraisal included the Bexley Council UDP (2004) and *Sustainability Appraisal Scoping Report*.

The method used for the appraisal of the options involved:

1. considering the two options and sustainable design and construction considerations and predicting their effect on the Sustainability Appraisal objectives;
2. presenting in Option B the relevant saved UDP policies that development would need to rely upon (if there were no SPD) and predicting their effect on the Sustainability Appraisal objectives; and,
3. assessing Option A against the predicted effects of the relevant saved UDP policies, available baseline information and topics to be addressed in the SPD.

Sustainability Appraisal objective	Option:	A	B
1: Accessibility		++	+
2: Education & skills		++	--
3: Housing		++	++
4: Human health		++	+
5: Prosperity & inclusiveness		++	++
6: Quality of surroundings		? / +	? / O
7: Air quality		? / +	? / O
8: Biodiversity		? / +	? / +
9: Climate change		? / +	?
10: Cultural heritage		? / +	? / +
11: Flood risk		O / +	O
12: Landscapes, townscapes & open spaces		? / +	? / +
13: Land, soil & water		? / +	? / O
14: Transport		? / +	?
15: Waste management		? / +	?
16: Economic growth		? / ++	++
17: Employment		++	++
18: Investment		? / ++	++

Table 5.1 Summary of Options Appraisal

Key to table - Likely effects on SA objectives / symbols					
	Total A	Total B		Total A	Total B
Major positive / ++	8	5	Uncertain; insufficient information to determine / ?	11	9
Minor positive / +	10	5	Minor negative / -	0	0
Neutral / O	1	4	Major negative / -	0	1

## 5 Plan Issues and Options

- 5.11** The effects on Sustainability Appraisal objective 2 vary depending on the option. Option A to produce a SPD has a positive effect on the education SA objective, but has a negative effect on Option B as the UDP does not contribute to raising awareness and requirements of sustainable design and construction.
- 5.12** The impacts of Options A and B on many of the Sustainability Appraisal objectives are dependent on the extent that the saved UDP policies are followed and the requirements of the SPD that extend beyond the saved UDP policies. For example, saved UDP Policy G34 seeks that new development achieve energy efficiency and conservation with the use of appropriate technology, but does not specifically mention certain developments achieve Building Research Establishment Environmental Assessment Method (BREEAM) very good or excellent rating or that the development should meet a proportion of its energy needs through onsite renewable energy generation. An uncertain effect on the Climate Change Sustainability Appraisal objective was recorded for Option B, however for option A an uncertain to positive effect was recorded based on the possible inclusion of further requirements in the SPD such as certain developments achieve BREEAM very good or excellent rating.
- 5.13** The impact on the following Sustainability Appraisal objectives is more relevant to the information and guidance provided in the SPD, specific design details, standards and requirements for new developments:
- Objective 6: To improve the quality of where people live
  - Objective 7: To improve air quality
  - Objective 8: To maintain and enhance biodiversity, flora and fauna
  - Objective 9: To reduce negative contributions and vulnerability to climate change
  - Objective 10: To maintain and where appropriate enhance cultural heritage and the historic environment
  - Objective 12: To maintain and enhance the quality of landscapes and townscapes including open spaces
  - Objective 13: To improve land, soil and water quality and the sustainable use of these resources
  - Objective 14: To reduce car dependency and encourage sustainable modes of transport
  - Objective 15: To minimise the production of waste and promote sustainable waste management and recycling
  - Objective 16: To encourage and accommodate sustainable economic growth
  - Objective 18: To encourage and accommodate the indigenous economy and potential inward investment
- 5.14** Generally, the effects of Option B are more uncertain as to whether they could lead to an improvement of the current situation, unlike Option A. The effects would be dependent upon the degree that saved policies in the UDP were implemented. Provided the saved policies in the UDP are followed, the option should not result in any effects that are dramatically worse than the other options but the application of saved UDP policies to new developments remains more uncertain than adoption of the SPD.

### **How social, environmental and economic issues were considered in choosing the preferred options**

- 5.15** It was determined that the option of preparing a SPD to guide developers and those in the design and construction of developments to achieve the highest possible standards of sustainable design and construction was the option to take forward and undertake a more detailed appraisal for consultation.
- 5.16** The adoption of the SPD is more likely to lead to reduce uncertainties, more certain prediction of effects and consideration of appropriate mitigation outcomes which would work towards sustainable development goals than if no SPD is adopted for sustainable design and construction.

### **Other options considered and why these were rejected**

- 5.17** The options that are presented in this Report were the only ones that were considered. Further options to be considered did not come forward as a result of consultation on the draft SPD.

## 6 Supplementary Planning Document

### Tasks B3 & B4 - Predicting and evaluating the effects of the draft SPD

**6.1** The Sustainability Appraisal Guidance recommends that in predicting and evaluating the social, environmental and economic effects of a Supplementary Planning Document (SPD) it is useful to examine "whether the effect will be permanent rather than temporary, and timescales over which the effect is likely to be observed." In addition, the Sustainability Appraisal Guidance suggests that the uncertainty surrounding predictions should also be identified.

### Significant social, environmental and economic effects of the SPD

**6.2** **Appendix I** predicts and evaluates the effects and uncertainty of effects of the seven principles and the sustainable design and construction matrix for the *Sustainable Design & Construction Guide SPD* on the Sustainability Appraisal objectives. Suggestions and mitigation measures are also included. A summary of the appraisal contained in **Appendix I** is provided below.

**6.3** The methodology used involved considerations of the principle itself, as well as, the topics that are addressed under the specific principle.

**6.4** The principles appraised are:

1. Ensuring land is safe for development
2. Ensuring access to and protection of the natural environment
3. Reducing negative impact of development on the local environment
4. Conserving resources and reducing carbon emissions
5. Ensuring comfort and safety in and around the development
6. Minimising the adverse effects of the construction process on site and surroundings
7. Encouraging sustainable living through building design and information provision

### Social Objectives

#### Principle 1: Ensuring land is safe for development

**6.5** In the short to long term, generally positive effects were identified for the social objectives when considering them against this principle.

**6.6** The principle should bring major positive effects to social objectives in the medium to long term due to the potential for development of land for a range of uses once it is safe for development.

#### Principle 2: Ensuring access to and protection of the natural environment

**6.7** In the short to long term, generally major positive effects were identified for the social objectives when considering them against this principle. There is the potential for the principle and topics considered to improve accessibility, improve health and well-being and reduce poverty and social exclusion. There was also some uncertainty of the effect of this principle in the long term on SA objective 3: To provide everyone the opportunity to live in a decent home due to potential development pressures on the natural environment for new housing.

#### Principle 3: Reducing negative impact of development on the local environment

**6.8** In the short to long term, generally positive effects were identified for the social objectives when considering them against this principle due to the consideration of noise and light pollution. There

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is the potential for those considerations to add to the definition of a decent home and their associated health benefits.

## **Principle 4: Conserving resources and reducing carbon emissions**

- 6.9** In the short to long term, generally neutral effects were identified for the social objectives when considering them against this principle. However, there were also some positive effects due to the consideration of energy and carbon emissions and materials and the potential for those considerations to add to the definition of a decent home and their associated health benefits.

## **Principle 5: Ensuring comfort and safety in and around the development**

- 6.10** In the short to long term, generally major positive effects were identified for the social objectives when considering them against this principle due to addressing internal air quality, natural light, accessibility, secure design, safe routes to public transport and safe and secure parking. There is the potential for the principle and topics considered to improve accessibility, contribute to the definition of a decent home and improve the quality of where people live.

## **Principle 6: Minimising the adverse effects of the construction process on site and surroundings**

- 6.11** In the short term, generally positive effects were identified for the social objectives when considering them against this principle. There is the potential for considerate construction to improve accessibility, improve skills, improve health and well-being and improve the quality of where people live.
- 6.12** In the medium to long term, it is uncertain whether this principle would produce positive or no significant effects when compared with the social objectives.

## **Principle 7: Encouraging sustainable living through building design and information provision**

- 6.13** In the short to long term, generally positive effects were identified for the social objectives when considering them against this principle due to the consideration of sustainable forms of transport, information provision and locally sourced labour. There is the potential for the principle and topics considered to add to improve accessibility, improve skills, contribute to the definition of a decent home, improve health and well-being, improve the quality of where people live and reduce poverty and social exclusion.

## **Sustainable design and construction matrix**

- 6.14** In the short to long term, generally major positive effects were identified for the social objectives when considering them against this matrix. There is the potential of requirements to improve accessibility, improve skills, contribute to the definition of a decent home, improve health and well-being, improve the quality of where people live and reduce poverty and social exclusion.

## **Environmental Objectives**

### **Principle 1: Ensuring land is safe for development**

- 6.15** In the short to long term, generally neutral effects were identified for the environmental objectives when considering them against this principle. However, there were also some positive effects. There is the potential to improve air quality, improve the quality of landscapes, townscapes

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and open spaces and improve land, soil and water quality and the sustainable use of these resources. There was also some uncertainty of the effect of this principle in the short to long term on SA objective 9: To reduce negative contributions and vulnerability to climate change.

### **Principle 2: Ensuring access to and protection of the natural environment**

**6.16** In the short to long term, generally positive effects were identified for the environmental objectives when considering them against this principle. There is the potential for the principle and topics considered to improve air quality, improve biodiversity, reduce carbon emissions, reduce and manage flood risk, improve the quality of landscapes, townscapes and open spaces, improve land, soil and water quality and encourage sustainable modes of transport.

### **Principle 3: Reducing negative impact of development on the local environment**

**6.17** In the short to long term, generally positive effects were identified for the environmental objectives when considering them against this principle due to the consideration of air pollution, flooding, micro climate and cultural heritage. There is the potential for the principle and topics considered to improve air quality, maintain and enhance biodiversity, reduce carbon emissions, maintain and enhance cultural heritage, reduce and manage flood risk, improve the quality of landscapes, townscapes and open spaces and improve land, soil and water quality.

### **Principle 4: Conserving resources and reducing carbon emissions**

**6.18** In the short to long term, generally positive effects were identified for the environmental objectives when considering them against this principle. There is the potential for the principle and topics considered to improve air quality, maintain and enhance biodiversity, reduce carbon emissions, reduce and manage flood risk, reduce car dependency and encourage sustainable forms of transport and minimise the production of waste. There was also some uncertainty of the effect of this principle in the short to long term on SA objective 10: To maintain and where appropriate enhance cultural heritage and the historic environment.

### **Principle 5: Ensuring comfort and safety in and around the development**

**6.19** In the short to long term, generally positive effects were identified for the environmental objectives when considering them against this principle. There is the potential for the principle and topics considered to improve air quality, reduce carbon emissions, reduce and manage flood risk, maintain and enhance the quality of landscapes and townscapes, improve land, soil and water quality, encourage sustainable modes of transport and minimise the production of waste and promote sustainable waste management.

### **Principle 6: Minimising the adverse effects of the construction process on site and surroundings**

**6.20** In the short term, generally positive effects were identified for the environmental objectives when considering them against this principle. There is the potential for considerate construction to improve air quality, maintain biodiversity, reduce carbon emissions, maintain cultural heritage, maintain the quality of landscapes and townscapes, improve land, soil and water quality and the sustainable use of these resources, reduce car dependency and encourage sustainable modes of transport and minimise the production of waste and promote sustainable waste management. In the medium to long term, it is uncertain whether this principle would produce positive or no significant effects when compared with the environmental objectives.

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## **Principle 7: Encouraging sustainable living through building design and information provision**

**6.21** In the short to long term, generally positive effects were identified for the environmental objectives when considering them against this principle due to the consideration of applying the waste hierarchy, sustainable forms of transport, information provision and locally sourced labour. There is the potential for the principle and topics considered to improve air quality, maintain and enhance biodiversity, reduce carbon emissions, reduce and manage flood risk, maintain and enhance the quality of landscapes and townscapes, improve land, soil and water quality and the sustainable use of these resources, reduce car dependency and encourage sustainable modes of transport and minimise the production of waste and promote sustainable waste management and recycling.

### **Sustainable design and construction matrix**

**6.22** In the short to long term, positive effects were identified for all of the environmental objectives when considering them against this matrix.

## **Economic Objectives**

### **Principle 1: Ensuring land is safe for development**

**6.23** In the short term, positive effects were identified for all of the economic objectives when considering them against this principle.

**6.24** The principle should bring major positive effects to economic objectives in the medium to long term due to the potential for development of land for a range of uses once it is safe for development.

### **Principle 2: Ensuring access to and protection of the natural environment**

**6.25** In the short to long term, generally uncertain effects were identified for the economic objectives concerned with economic growth and inward investment when considering them against this principle.

### **Principle 3: Reducing negative impact of development on the local environment**

**6.26** In the short to long term, positive effects were identified for all of the economic objectives when considering them against this principle.

**6.27** The principle should bring positive effects to economic objectives due to the potential for enhanced development and work place environments.

### **Principle 4: Conserving resources and reducing carbon emissions**

**6.28** In the short to long term, positive effects were identified for all of the economic objectives when considering them against this principle.

**6.29** The principle should bring positive effects to economic objectives due to the potential for enhanced development and work place environments and reduced running costs of developments.

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### **Principle 5: Ensuring comfort and safety in and around the development**

- 6.30** In the short to long term, positive effects were identified for all of the economic objectives when considering them against this principle.
- 6.31** The principle should bring positive effects to economic objectives due to the potential for enhanced and safe development and work place environments and movements to them.

### **Principle 6: Minimising the adverse effects of the construction process on site and surroundings**

- 6.32** In the short term, generally positive effects were identified for the economic objectives when considering them against this principle. There is the potential for considerate construction to encourage sustainable growth and provide opportunities for rewarding and satisfying local employment. In the medium to long term, it is uncertain whether this principle would produce positive or no significant effects when compared with the economic objectives.
- 6.33** There was also some uncertainty of the effect of this principle in the short to long term on SA objective 18: To encourage and accommodate the indigenous economy and potential inward investment.

### **Principle 7: Encouraging sustainable living through building design and information provision**

- 6.34** In the short to long term, generally positive effects were identified for the economic objectives when considering them against this principle due to the consideration of locally sourced labour. There is the potential for the principle and topics considered to encourage and accommodate sustainable economic growth and provide opportunities for rewarding and satisfying employment.

### **Sustainable design and construction matrix**

- 6.35** In the short to long term, positive effects were identified for all of the economic objectives when considering them against this matrix.

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## Overall and cumulative effects

- 6.36** Cumulative effects arise where several individual effects of the SPD (e.g. the seven principles and sustainable design and construction matrix) have a combined effect.
- 6.37** Generally, the cumulative effects of the individual principles and sustainable design and construction matrix of the SPD are likely to be major positive in the short to long term against the social, environmental and economic Sustainability Appraisal objectives, with some or no uncertainty associated with some objectives.
- 6.38** The cumulative effects of the seven principles and the sustainable design and construction matrix of the SPD against each other are also likely to be major positive in the short to long term against the social, environmental and economic Sustainability Appraisal objectives, with some greater uncertainty associated with some objectives. This uncertainty has combined with other principles to produce greater uncertainty overall.

## 7 Implementation

### Task B5 - Considering ways of mitigating adverse effects and maximising beneficial effects

7.1 Measures to prevent, reduce or offset significant adverse effects of implementing the Supplementary Planning Document (SPD) must be included in the Sustainability Appraisal Report.

#### Proposed mitigation measures

- 7.2 An overall crucial mitigation measure is to ensure firstly that the relevant saved policies in the Unitary Development Plan (UDP) are followed. Further recommendations for the SPD are:
- The topic *Applying the waste hierarchy during construction and demolition* it seems would be better placed under the principle of *Minimising the adverse effects of the construction process on site and surroundings* than the principle *Encouraging sustainable living through building design and information provision*.
  - The topics under the principle *Encouraging sustainable living through building design and information provision* don't seem to address fully or fit well under this principle.
  - The principle *Encouraging sustainable living through building design and information provision* needs to cross reference to other topics under other principles in the SPD that also relate to this principle.
  - The SPD should consider making more clear the intent and function of the sustainable design and construction checklist. It is felt more appropriate that the sustainable design and construction matrix should be the checklist.

#### Uncertainties and risks

- 7.3 The effects of the SPD on many of the Sustainability Appraisal objectives could be improved or made more certain if:
- Some of the recommendations for objectives, principles and topics are considered through alterations to the SPD structure to address more concisely the principles, improve consistency and application of guidance and readability. These are shown previously in proposed mitigation measures.
- 7.4 The risks that exist for this SPD are more so associated with its implementation and management at the project level (submission of sustainable design and construction proposal with the planning application for a new development and the actual development and construction work undertaken on the ground to develop the site) to ensure that the saved UDP policies and the SPD guidance are followed.

## Links to other tiers of plans and programmes and the project level

- 7.5** The Sustainability Appraisal guidance states that, where possible, links should be made with other types of appraisal. Best practice is to encompass other types of appraisal into the Sustainability Appraisal (SA) process, to avoid duplication and take advantage of synergies.
- 7.6** Synergies have been identified with Health Impact Assessment and Equality Impact Assessment. Where relevant, the SA has integrated the objectives of these assessments into the SA objectives. In particular, the following SA objectives were included and were used to appraise the SPD:
- To improve access to essential services and facilities especially where there is disadvantage or special needs,
  - To improve the health and well-being of the population, and
  - To reduce poverty and social exclusion.
- 7.7** Amendments to the UK Conservation (Natural Habitats, &c.) Regulations 1994 came into force in October 2006 to bring it into accordance with the *Habitats Directive*. A screening exercise for an Appropriate Assessment under Article 6(3) and (4) of the *Habitats Directive* has been undertaken. This was completed following consultation on the draft SA Report and SPD and is presented as a separate report in **Appendix J – Appropriate Assessment**.
- 7.8** An Environmental Impact Assessment may be applicable to certain developments. It may also assist in reducing uncertainties and risks that exist against some of the SA objectives.

## Task B6 - Proposing measures to monitor the significant effects of implementing the SPD

- 7.9** The Sustainability Appraisal Guidance notes that monitoring is not a separate exercise from the rest of the Supplementary Planning Document (SPD) or Sustainability Appraisal process.
- 7.10** Monitoring allows the actual significant effects of implementing the SPD to be tested against those predicted in the Sustainability Appraisal. It also assists to ensure that problems that arise during implementation can be identified and future predictions made more accurately.

## Proposals for monitoring

- 7.11** The indicators in the Sustainability Appraisal framework in **Appendix F** are those that are proposed to monitor the sustainability effects of the SPD.
- 7.12** The Council's Annual Monitoring Report (AMR) will also assist by providing a regular assessment of the performance of the Borough's current and new planning policies.



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