

LOCAL DEVELOPMENT FRAMEWORK
SUPPLEMENTARY PLANNING DOCUMENT

Sustainability Appraisal Report Planning Obligations Guidance

Final Report
26th July 2008



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Summary and Outcomes | 1

Non-technical summary

- 1.1 This Sustainability Appraisal Report has been prepared for the *Planning Obligations Guidance Supplementary Planning Document (SPD)*.

What are Planning Obligations?

- 1.2 Planning obligations, or Section 106 agreements, are legal agreements between Local Authorities and developers (or unilateral undertakings made by developers) in the context of the grant of planning permission. Planning obligations are intended to make acceptable development which would otherwise be unacceptable in planning terms. As the local impacts of development frequently extend beyond site proposal boundaries, Local Authorities require planning obligations to ensure such impacts are mitigated.
- 1.3 The *Planning Obligations Guidance SPD* will comprise part of the London Borough of Bexley's Local Development Framework. The document conveys the Borough's approach and objectives in securing planning obligations. This approach includes a formal basis for calculating the type and scale of contributions sought. The SPD will therefore ensure the Borough applies a consistent and transparent process for negotiating agreements.
- 1.4 Importantly, the Supplementary Planning Document will be material consideration for use in determining planning applications.

Delivering Sustainable Development

- 1.5 Government policy, particularly *Planning Policy Statement 1 (2005)*, requires that Local Authorities assist in delivering sustainable development. This objective sets the basis for plan production. As Paragraph 24 of Planning Policy 1 states, 'planning authorities should ensure that sustainable development is treated in an integrated way in their development plans'.
- 1.6 Under Section 39(2) of the *Planning and Compulsory Purchase Act 2004*, Local Authorities are required to conduct Sustainability Appraisal of Local Development Documents, including Supplementary Planning Documents.

What is Sustainability Appraisal?

- 1.7 In general, Sustainability Appraisal is a process used to consider the relationship between social, environmental and economic factors. It functions as a practical tool for Local Authorities to assist in delivering sustainable development.
- 1.8 More specifically, Sustainability Appraisal attempts to predict and highlight the significant effects of plan implementation. The appraisal includes consideration of actions or measures that may assist in enhancing the positive effects of a plan, as well as the certainty of those positive effects occurring. Appraisal also attempts to identify measures to reduce or mitigate anticipated negative effects.
- 1.9 An understanding of the social, environmental and economic situation in Bexley is needed in order to appropriately appraise effects of implementing the Supplementary Planning Document. Therefore, as part of the Sustainability Appraisal exercise a 'baseline' set of local data has been compiled. This data is key to the appraisal because it provides a snapshot of Bexley at the current moment. Further, it sets the basis against which the effects of the plan may be assessed, and in future years monitored. The baseline is included in the Sustainability Appraisal Report Appendices.
- 1.10 Sustainability Appraisal of the *Planning Obligations Guidance SPD* has been completed as an iterative process. In other words, the Supplementary Planning Document has undergone appraisal

1 Summary and Outcomes

at various plan production intervals, including: interim, Draft SPD and adoption SPD stages. The iterative review process has been progressed in order to ensure a consistent Sustainability Appraisal direction in production of the plan. Results from iterative appraisals have been documented throughout this Report.

Key Findings of the Sustainability Appraisal

- 1.11** In general, Sustainability Appraisal concludes that implementation of the *Planning Obligations Guidance SPD* is likely to result in a neutral effect on Bexley's baseline in the short-term, and more positive effects in the medium to long-term. These social, environmental and economic effects are detailed more rigorously below and throughout the Sustainability Appraisal Report.
- 1.12** Notably, iterative appraisals have highlighted opportunities for improving the Supplementary Planning Document's anticipated impact on the environmental baseline. In multiple instances, these opportunities have been addressed through plan revision. Accordingly, the SPD has benefited from Sustainability Appraisal. The process has progressively enhanced the plan's capacity to positively impact on Bexley's sustainability objectives on whole, and environmental objectives in particular.

The likely effects of the Plan

- 1.13** The likely effects of the Supplementary Planning Document are represented in this Report as the plan's predicted impacts on Sustainability Appraisal objectives. For reference, these objectives are listed in **Appendix G** (but are also cited throughout the Appendices). Predicted impacts are gauged against Bexley's social, environmental and economic baseline.
- 1.14** In general, Sustainability Appraisal predicts that implementation of the *Planning Obligations Guidance SPD* is likely to result in positive (or beneficial) social, environmental and economic effects.
- 1.15** Importantly, the positive effects are predicted to begin occurring over the medium to long term - a minimum 5 years beyond the date of SPD implementation. Positive effects are in large part dependent on the cumulative impact of obligations, whereby a dedicated resource is secured, accrued and applied through time.
- 1.16** Accordingly, a neutral effect is generally expected in the short term. This is because the obligations negotiated and applied strictly within 5 years of SPD implementation are not likely to be sufficient to significantly impact on the Borough's sustainability objectives and indicators.
- 1.17** The Sustainability Appraisal Report and Appendices provide a detailed synopsis of the anticipated impacts of implementing the *Planning Obligations Guidance SPD*. Highly beneficial effects are listed in short-summary below.
- 1.18 Medium to long term highly beneficial effects on social objectives**
- To improve access to essential services and facilities, especially where there is disadvantage or special need;
 - To provide everybody with the opportunity to live in a decent home;
 - To improve the health and well-being of the population; and
 - To reduce poverty and social exclusion.

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1.19 Medium to long term highly beneficial effects on environmental objectives

- To maintain and enhance the quality of landscapes and townscapes including open spaces; and
- To reduce car dependency and encourage sustainable modes of transport.

1.20 Medium to long term highly beneficial effects on economic objectives

- To encourage and accommodate sustainable economic growth.

The difference the process has made to date

1.21 Sustainability Appraisal for the *Planning Obligations Guidance SPD* was progressed as an iterative process. In other words, the document underwent appraisal at various plan production intervals.

1.22 Production of the Supplementary Planning Document was informed by Sustainability Appraisal and consultation on a Draft SPD. The Draft SPD was in turn subject to an ongoing interim review process throughout its early production stages. Comments and recommendations from the interim review and Draft appraisal stages were in many instances incorporated into the adoption SPD.

1.23 The iterative review process was crucial to the development of the adoption document. It enhanced opportunities for both the appraisal team and stakeholders to lend informed perspective on improving the content, implementation protocol and anticipated beneficial effects of the SPD.

1.24 An effort has been made in this Report to reflect the iterative review process undertaken. Where relevant, comments and/or recommendations presented at the interim review and Draft appraisal stages have been included in the Sustainability Appraisal Report and Appendices. The Report has been produced as such to heighten reader understanding of the iterative review process and how it influenced development of the adoption SPD.

1.25 The iterative approach is most clearly demonstrated and described in **Sections 7 and 8** of this Report, as well as **Appendix I** of the Sustainability Appraisal Report Appendices.

1.26 Furthermore, the Sustainability Appraisal Report includes recommendations for enhancing the identified beneficial effects of the *Planning Obligations Guidance SPD*, should the Council opt to review and/or revise the Supplementary Planning Document in the future. The recommendations are identified in **Section 8** of this Report, as well as **Appendix I** of the Sustainability Appraisal Report Appendices.

2 Background

The purpose of Sustainability Appraisal and the Sustainability Appraisal Report

- 2.1** Sustainable development is central to the reformed planning system and to Government policy. Importantly, *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 *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; and
 - Using sound science responsibly.
- 2.3** Furthermore, priority areas for immediate action outlined by the Strategy are as follows:
- 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 corresponds with objectives of the *UK Sustainable Development Strategy*. It is a tool to assist Local Authorities in identifying approaches for managing key planning issues and environmental concerns. Specifically, the purpose of Sustainability Appraisal is to promote sustainable development by way of integrating social, environmental and economic considerations into the plan production process.
- 2.5** The *Planning and Compulsory Purchase Act 2004* introduced the requirement for Local Authorities to undertake Sustainability Appraisal for each Development Plan Document and Supplementary Planning Document produced. This Sustainability Appraisal Report contributes documentary evidence demonstrating that the London Borough of Bexley has fulfilled such requirement on the *Planning Obligations Guidance SPD*.

Strategic Environmental Assessment and Sustainability Appraisal

- 2.6** Sustainability Appraisal is a mandatory protocol for planning documents under the requirements of the *Planning and Compulsory Purchase Act 2004*. Notably, requirements of 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 satisfied.
- 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 the implementation of plans and policies. The *Strategic Environmental Assessment Directive* came into effect on 21 July 2004 and applies to the preparation of new or revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), as well as to a range of other plans.
- 2.8** Strategic Environmental Assessment is focused primarily on environmental effects of plan implementation, whereas Sustainability Appraisal considers a broader scope of effects on sustainability: social, environmental and economic.

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- 2.9** The key output of Strategic Environmental Assessment is an Environmental Report that describes the environmental assessment process, likely significant effects of the plan and reasonable plan options. Alternatively, the key output of Sustainability Appraisal is a Sustainability Appraisal Report that describes the likely significant environmental effects of the plan (as with the SEA Environmental Report) as well as broader social and economic effects.
- 2.10** The requirements to undertake Sustainability Appraisal and Strategic Environmental Assessment are distinct. However, the Government's approach has provided that both requirements may be accommodated through a single appraisal process.
- 2.11** In November 2005, the Office of the Deputy Prime Minister published *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*. The publication set out a clear process for undertaking Sustainability Appraisal (which fulfils the requirements for SEA) as it applies to Development Plan Documents and Supplementary Planning Documents. This Government guidance is referred to as the 'Sustainability Appraisal Guidance' throughout this report.
- 2.12** **Table 2.1** below exhibits a summary of the *Strategic Environmental Assessment Directive* requirements for the preparation of an Environmental Report, as listed in Annex I of the Directive. The table further indicates where the requirements are addressed in this particular Sustainability Appraisal Report.

The SEA Directive's Requirements	Covered in this Report
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Sections 2 & 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.	Section 4 Appendices B, C, D & E
The environmental characteristics of areas likely to be significantly affected.	Section 4 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).	Section 4 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.	Section 4 Appendix A & J
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.	Sections 5, 6, 7 & 8 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.	Sections 7 & 8 Appendix I & J
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.	Sections 3, 5, 6, & 7 Appendices F, G, H & I
A description of measures envisaged concerning monitoring in accordance with Article 10.	Section 7 & 8 Appendix F

2 Background

The SEA Directive's Requirements	Covered in this Report
A non-technical summary of the information provided under the above headings.	Section 1

Table 2.1 Strategic Environmental Assessment Directive Requirements of Sustainability Appraisal

The Supplementary Planning Document (SPD)

2.13 The *Planning Obligations Guidance SPD* articulates the London Borough of Bexley's approach and objectives in securing planning obligations, or Section 106 agreements.

2.14 Specifically, the Supplementary Planning Document functions to: prescribe procedures for the use of planning obligations; distinguish the types of development subject to process; formalise protocols for negotiating, calculating and monitoring financial contributions; identify the broad range of likely contributions sought; and clarify the potential community benefits to be funded.

2.15 The *Planning Obligations Guidance SPD* has several key objectives, as follows:

- Establish a transparent and consistent process for negotiating, applying and monitoring planning obligations;
- Ensure clear procedural expectations for the Council, developers, local community and other stakeholders;
- Set a standardised basis for the Council in managing legal agreements, allowing more timely and cost-effective decisions on applications involving Section 106 agreements; and
- Enable planning obligations to be considered from the earliest stages of the proposal formulation process.

2.16 As noted above, the *Planning Obligations Guidance SPD* identifies the key contributions to be secured through planning obligations or Section 106 agreements, where relevant for new development. These contributions are detailed in the Supplementary Planning Document according to categories of requirements, as follows:

- Affordable housing;
- Transport, access and public realm improvements (including cycling, walking, town centre, public safety and public art);
- Education;
- Employment training;
- Health services and facilities;
- Open space, sports and leisure facilities;
- Local community facilities and services; and
- Professional, legal and monitoring fees.

2.17 The Supplementary Planning Document adheres to Government planning policy and guidance. It is also in general conformity with the regional Spatial Development Strategy, the *London Plan*. Furthermore, the SPD is consistent with the London Borough of Bexley's saved Unitary Development Plan (UDP) policies specific to planning obligations. These UDP policies are as follows: **H14** (affordable housing); **T11** (improvements to public transport); **TAL7** (open space/play space); **TS4** (Erith Quarry); **TS5** (Manor Road Site F); **TS14** (improved access to Thames Riverside); **TS16** (Crossness improvements); and **TS21** and **TS23** (West Street housing sites).

The structure of this Sustainability Appraisal Report

2.18 This Sustainability Appraisal Report is comprised of 8 main sections, as follows:

- Section 1 - Introductory information, including a non-technical summary.
- Section 2 - Background on Sustainability Appraisal and Strategic Environmental Assessment.
- Section 3 - Sustainability Appraisal methodology.
- Section 4 - London Borough of Bexley sustainability objectives, baseline data and policy context.
- Section 5 - Issues and options considered in SPD production.
- Section 6 - Sustainability Appraisal summary, including anticipated effects of SPD implementation.
- Section 7 - SPD implementation and monitoring.
- Section 8 - Consulting on the Draft SPD and Sustainability Appraisal Report

2.19 Additionally, a series of Appendices are included as part of the Sustainability Appraisal work and requirements.

3 Appraisal Methodology

Approach adopted to the sustainability appraisal

- 3.1** Sustainability Appraisal of the *Planning Obligations Guidance Supplementary Planning Document* (SPD) was performed according to the process set out in Figure 9 of the Sustainability Appraisal Guidance.
- 3.2** The Sustainability Appraisal Guidance advises a five-stage approach for undertaking Sustainability Appraisal. A process designed specifically for Supplementary Planning Documents is presented according to this approach. This process is exhibited in **Table 3.1** below.

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 findings of Stages B and C of the noted appraisal process. Stages B and C consist of the seven tasks exhibited 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 Stages B and C

- 3.4** Formal public consultation on the Draft *Planning Obligations Guidance SPD* and Sustainability Appraisal Report were undertaken. This Sustainability Appraisal Report includes assessment of the significant changes arising as a result of the consultation, as per Stage D tasks. The subsequent phases of the Sustainability Appraisal process are shown in **Table 3.3**. Actions undertaken according to Stage E tasks are documented in this Report.

Stage D: Consulting on the draft Supplementary Planning Document and Sustainability Appraisal Report	
Task D1	Public participation on the Sustainability Appraisal Report and the draft Supplementary Planning Document.
Task D2	Assessing significant changes.
Supplementary Planning Document Stage 3: Adoption	
Task D3	Making decisions and providing information.
Stage E: Monitoring the significant effects of implementing the Supplementary Planning Document	
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 Stage A of the appraisal methodology was performed in 2007, with results published in the Sustainability Appraisal Scoping Report for the *Planning Obligations Guidance SPD*. A six week consultation on the Report was carried out from **03 October to 15 November 2007**.
- 3.6 Sustainability Appraisal Scoping Report consultation met requirements of the Strategic Environmental Assessment (SEA) Regulations.
- 3.7 Stage D of the appraisal methodology progressed development of the Draft *Planning Obligations Guidance SPD*. Stage D included production of a Sustainability Appraisal Report on the Draft document. The Report was a key output of the appraisal process, providing a detailed synopsis of the anticipated effects of implementing the Draft Supplementary Planning Document.
- 3.8 Sustainability Appraisal on the Draft document was carried out from September 2007 to January 2008, with a Sustainability Appraisal Report made available for public consultation as per Stage D guidance. The consultation was carried out from **07 April to 19 May 2008**.

Who carried out the sustainability appraisal

- 3.9 It is the responsibility of the Local Planning Authority to ensure Sustainability Appraisal is carried out in accordance with the *Strategic Environmental Assessment Directive*, the *Planning and Compulsory Purchase Act 2004* and the *Environmental Assessment of Plan and Programmes Regulations 2004*.
- 3.10 For this Supplementary Planning Document, the London Borough of Bexley engaged a contract staff member from outside the organisation to perform tasks on the Scoping Report, Draft and adoption SPD. This external resource contributed relevant expertise and an independent viewpoint in appraisal of the document.
- 3.11 Whilst an external resource was dedicated throughout the appraisal, a Council resource was also engaged on the final Stage D and E tasks. The Council resource performed key functions in progressing the iterative review format.
- 3.12 Throughout the Sustainability Appraisal process, the London Borough of Bexley ensured that project resources executed tasks on an independent basis. Such action provided that resources retained a detached perspective from the Local Authority in appraisal of the SPD.

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Who was consulted, when and how

Sustainability Appraisal Scoping Report

- 3.13** The Sustainability Appraisal Scoping Report was subject to consultation from **03 October 2007** to **15 November 2007**, a six-week period as required by the Strategic Environmental Assessment Regulations.
- 3.14** Consultees included the three statutory environmental consultation bodies as required by the *Strategic Environmental Assessment Directive* - English Heritage, Environment Agency and Natural England. The Greater London Authority and Government Office for London were included as additional consultees.
- 3.15** Comments were received from English Heritage, Environment Agency, Natural England and Government Office for London. Consultation feedback was made available for information as input into Supplementary Planning Document production.
- 3.16** In general, consultees supported the Borough's intention to secure planning obligations in view of the broad objective to deliver sustainable development.
- 3.17** More detailed commentary was incorporated into the emerging Draft Supplementary Planning Document where appropriate, and further emphasised throughout the iterative review process. For example, an additional review of policy documents was undertaken in response to comments received, and the policy framework of Chapter 4 and Appendix A of the Sustainability Appraisal Report Appendices were revised accordingly. As another example, Environment Agency commentary on climate change and flood risk was noted, and environmental factors were more thoroughly considered as production of the Draft SPD progressed.
- 3.18** Further comments specific to the Borough's Sustainability Appraisal objectives and baseline monitors were flagged as information. Comments were reiterated in instances where they were not integrated into Draft revisions of the SPD.

Draft Supplementary Planning Document and Sustainability Appraisal Report

- 3.19** The Draft *Planning Obligations Guidance SPD* and Sustainability Appraisal Report were made available for formal public consultation simultaneously from **07 April 2008** to **19 May 2008**, a six-week period as required by the Local Development Regulations.
- 3.20** The three statutory consultation bodies - English Heritage, Environment Agency and Natural England - were provided with hard copies of the Draft Supplementary Planning Document, Sustainability Appraisal Report and Appendices. The Greater London Authority and Government Office for London were included as additional consultees.
- 3.21** Hard copies of the Draft Supplementary Planning Document, Sustainability Appraisal Report and Appendices were made available at Bexley Council Offices and Libraries for public viewing. Copies of the Draft Supplementary Planning Document and Sustainability Appraisal Report were also sent to key stakeholders and developers, along with consultation advice including: response protocols, timelines and information on accessing full documentation.
- 3.22** Due to the significant scope of the Supplementary Planning Document, the London Borough of Bexley notified all consultees on its Local Development Framework consultation database. This amounted to approximately 1,200 stakeholders.
- 3.23** Local organisations in Bexley received letter notifications informing them that Draft Supplementary Planning Documents were available for viewing online via the London Borough of Bexley web-site. Organisations were further informed of possibilities for accessing hard copies on request, or

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through viewing at Council Offices and Libraries. Letters provided consultation advice including: response protocols and timelines.

3.24 Notification of the Draft Supplementary Planning Document, Sustainability Appraisal Report and Appendices was also made via public press notice and Council press releases. Notices provided consultation advice including: response protocols, timelines and information on accessing full documentation. The London Borough of Bexley web-site was updated to include web-links to the relevant consultation documents.

3.25 **Table 3.4** below provides a summative account of representations received from the statutory consultation bodies on the Draft Sustainability Appraisal Report.

Organisation	Report section	Representation	Bexley Council response
English Heritage	Chapter 4 Sustainability Objectives, Baseline and Context	English Heritage notes and welcomes inclusion of the European Landscape Convention, PPGs 15 and 16 in the plans and programmes section. We would encourage LB of Bexley to include any relevant local plans for the historic environment, for example Conservation Area Management Plans.	Noted. <i>Table 4.1</i> and <i>Appendix A</i> have been amended to include the following final Conservation Area Management Plans: Brook Street, Erith Road, Longlands Road, and Red House Lane.
	Chapter 4 Sustainability Objectives, Baseline and Context, Paragraph 4.14	In terms of the data gaps and the need for additional data monitors set out in section 4.14, the use of historic environment indicators could be a component of both 'quality of surroundings' and 'quality of landscape and townscape'.	Noted. This will be considered, but would be better placed in 'quality of landscape and townscape'.
	Chapter 4 Sustainability Objectives, Baseline and Context, Table 4.2	English Heritage welcomes inclusion of a specific sustainability objective for the historic environment (10) and also the identification that preservation and enhancement of this resource is a key sustainability issue in table 4.2. The opportunities identified in table 4.2 and Appendix F could be expanded to include improving access to the historic environment and use of heritage assets as educational resources. There are also opportunities through planning obligations to enhance understanding of the historic environment in LB of Bexley and dissemination of this knowledge to local communities.	Noted. <i>Table 4.2</i> expanded on as suggested.
	Chapter 5 Plan Issues and Options and Appendices G & H	English Heritage has reviewed the appraisal of the objectives and options for sustainability objective (10) on the historic environment in Appendix G and H. We note that the likely effects appear to be positive on the SA objectives and 'minor positive' for SPD options 3 and 4. We particularly welcome the move towards a new application of obligations in respect to the historic environment and recognition that there are links with other objectives in the SPD. We encourage LB of Bexley to give further thought to how the effects can have a more 'major positive' effect (further details below). For example to bring	Noted. Will give further thought to beneficial effects.

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Organisation	Report section	Representation	Bexley Council response
		benefits more inline with sustainability objective 12.	
	Chapter 5 Plan Issues and Options and Appendices G & H	..the contribution options appraisal is also disappointing, with all effects expected to be neutral, with exception of the 'open space, public realm and public arts' contribution. For example, contributions for option B could benefit the historic environment, for example historic streetscape improvements, option C could benefit the historic environment by improving this resource for educational purposes, and option H could also benefit the historic environment by providing heritage based community facilities/ services, either as a community venue or as an attraction to improve cultural opportunities in its own right.	Noted. <i>Appendix H</i> amended.
	Appendix A - Review of other policies, plans, programmes and sustainability objectives	In Appendix A it would be useful to consider historic landscapes and the wider historic environment, such as those elements that may not be statutorily protected, yet help define the Boroughs' local distinctiveness. This would be most applicable in the descriptions of your identified themes 'maintain and enhance the quality of open spaces, landscapes and townscapes' and 'preserve cultural heritage including archaeological resources'.	Noted. <i>Appendix A</i> amended.
	Appendix D - Environmental baseline	Overall the baseline data provided for the historic environment in appendix D is well thought out. For Conservation Areas, it might be useful to also include the number of Conservation Areas with an up-to-date appraisal and management plan as an indicator. LB of Bexley could also consider including information on your local list of heritage assets (if one exists), in addition to the nationally designated assets already identified. It may also be appropriate to identify 'archaeology priority areas', as other Boroughs have done, on the basis of research that indicates these are areas more likely to contain archaeological remains than others...	Noted. Further indicators mentioned will be added to <i>Appendix D</i> .
Environment Agency	Chapter 7 Implementation, Paragraph 7.9	Bexley's Service Areas A-G...do not appear to provide sufficient scope for planning obligations for environmental infrastructure. Therefore we agree with the statement in the Sustainability Appraisal Report that 'further improvement may be achieved if the SPD is revised to include a broader scope of obligations on the Boroughs environmental objectives', and the specific reference to inclusion of obligations on sustainable drainage systems and related water management and infrastructure. This should be expanded to include not only contributions towards SUDs but also maintenance commitments. We recommend an additional option for environmental	Noted. Provision is provided in Paragraph 3.3 of the SPD for the Council to consider additional planning obligations where these are required to manage impacts or other requirements that relate specifically to a development. The Council therefore considers there to be sufficient scope to consider obligations for environmental

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Organisation	Report section	Representation	Bexley Council response
		infrastructure on paragraph 5.11 of the Sustainability Appraisal Report.	infrastructure where applicable.
	Appendix D - Environmental baseline	We noted in our SA Scoping representation that more data needs to be compiled for flood risk issues. On pages 78-79 of the SA Report Appendices, there is no information on targets and trends for flood risk. This is needed to allow the assessment of change and policy performance against key indicators. Examples include: the number of dwellings in Flood Zone 3, the number of new or replacement dwellings permitted in Flood Zone 3 and the number of highly vulnerable premises within flood Zone 3 (as per PPS25 Annex D). It may be possible to compile some baseline using the SFRA. Other indicators would include the number of people and property affected by flooding, the frequency of flood events, the types of development and number of properties which may be affected by subsidence, the nature of the population and the presence and reliability of mitigation measures to manage flood risk.	Noted. This information will be compiled as the SFRA is prepared for the Borough in the later part of 2008.
	Appendix I - Objectives 9 & 11	We support the emphasis on river enhancements both recognised by SA Objectives 9 and 11.	Noted.
	Appendix I - Objective 11	We are pleased to note that the SA recognises the need to extend the scope of the SPD to incorporate our recommendations on surface water storage and infiltration infrastructure, sustainable drainage systems and river enhancements.	Noted.
Natural England	Chapter 4 Sustainability Objectives, Baseline and Context, Paragraph 4.14	In respect of baseline data for biodiversity as mentioned under paragraph 4.14 of the Sustainability Appraisal the Council should also give consideration to entering into an agreement with Greenspace Information for Greater London (GIGL) for the provision of biodiversity data including details of statutory and non-statutory sites, distribution of protected species and location of habitats and species of nature conservation value. GIGL has a sizeable and rapidly expanding database of biodiversity and other green-space data. You can contact GIGL at: GIGL@wildlondon.or.uk	Noted. The Council are currently registered with GIGL, and working with the London Wildlife Trust, are exploring opportunities to use GIGL biodiversity data in cross reference to the Council's mapping database and emerging LDF documents.

Table 3.4 Draft Sustainability Appraisal Report Representations

Difficulties encountered in compiling information or carrying out the assessment

3.26 There were several difficulties encountered throughout the Sustainability Appraisal process. These difficulties are both listed and explained in detail below.

3 Appraisal Methodology

Miscommunication on the preferred option progressed

- 3.27** A principal challenge in appraisal of the Supplementary Planning Document was encountered at the preferred option and Draft stage of SPD production. Specifically, there was miscommunication on the preferred option progressed for the Draft SPD. As a result, the appraisal team progressed assessment on an option that was not wholly reflected in the adoption SPD.
- 3.28** The adoption SPD was produced according to Option 3 of the identified options (detailed in this Report in Section 5 on 'Plan Issues and options'). However, appraisal at the Draft SPD stage was performed on the understanding that Option 4 was carried forward (see section 5). Whilst measures were ultimately undertaken to ensure full appraisal of the appropriate SPD option, miscommunication on the preferred option at the draft production stage presented difficulties. Namely, considerable reassessment and revision to work performed throughout the Sustainability Appraisal process was required.
- 3.29** This Sustainability Appraisal Report has endeavoured to draw clarity to the difficulties encountered. Therefore, information has been presented in a manner such that the reader is guided to recognise clear linkage between the results of the iterative review process.
- 3.30** Further to the above, several sections of this Report contain detailed descriptions of appraisal exercises and related findings. Sections 6 and 7 are noteworthy for their explanatory emphasis. Further, the 'comments' section of **Appendix I** of the Sustainability Appraisal Report Appendices has been developed in a way that provides readers with informed perspective on the progressive development of the SPD. Additional details on the preferred options stage are also included Section 5 of this Report.
- 3.31** It is worth noting that the difference between Options 3 and 4 is notable, yet not overly concerning from a Sustainability Appraisal perspective. This is because Option 4 differs from Option 3 only in terms of identified threshold arrangements for negotiating planning obligations. Otherwise, the options are substantively similar. This point is reflected by results of appraisal exercises, discussed later in this report. In short summary, appraisal results have demonstrated consistent parallels on the scope of predicted effects of implementing both Option 3 and 4. Such parallels would not have been demonstrated had Options 1 or 2 been progressed in the adoption SPD.
- 3.32** Whilst dedicated refinement of the Sustainability Appraisal Report was required as a result of the noted miscommunication, the situation was taken as a key challenge in plan production. The challenge should not draw from the reality that both Draft and adoption Supplementary Planning Documents have been subject to thorough review in accordance with the Sustainability Appraisal Guidance.

Incomplete information at the Draft stage of SPD and Sustainability Appraisal production

- 3.33** A further challenge in conducting the Sustainability Appraisal was encountered with the exercise of predicting effects of the emerging Draft and Draft Supplementary Planning Document. As the appraisal was progressed as an iterative process, early assessments were carried on without full detail of the contents of the emerging and Draft SPD, contributing uncertainty to prediction exercises. Accordingly, preliminary assessments were limited in their comprehensiveness. The challenge was in certain respects anticipated, as it was understood the iterative review process would inherently require and result in continued refinement of the Supplementary Planning Document.

Data gaps in baseline information

- 3.34** Further to the above, the exercise of predicting effects was made challenging by some existing data gaps and limitations of baseline information. Data gaps and limitations are discussed in further detail in Section 4.

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, there is a requirement to review the policies, plans, programmes and sustainable development objectives relevant to the SPD.
- 4.2** The Strategic Environmental Assessment Directive further requires environmental protection objectives established at International, European Community or National levels to be taken into account.
- 4.3** Policies, plans and programmes reviewed and considered relevant to the *Planning Obligations Guidance SPD* are listed below in **Table 4.1**. Furthermore, **Appendix A** of the Sustainability Appraisal Report Appendices provides a policy review summary, exhibiting how the identified policies, plans and programmes were considered relevant to the SPD.

	Reference
International	
1.	Water Framework Directive (2000)
2.	European Landscape Convention (2000) (UK ratified 2006)
National	
3.	UK Sustainable Development Strategy, Securing the Future (2005)
4.	Sustainable Communities, Building for the Future (2003)
5.	UK Climate Change Programme (2006)
6.	Energy White Paper, Meeting the Energy Challenge (2007)
7.	Working with the Grain of Nature, A Biodiversity Strategy for England (2002)
8.	The Air Quality Strategy for England, Scotland, Wales & Northern Ireland (2000)
9.	The Future of Transport, A Network for 2030 (White Paper) (2004)
10.	Directing the Flow, Priorities for Future Water Policy (2002)
11.	Diversity & Equality in Planning, Good Practice Guidance (2005)
12.	National Community Safety Plan 2006-2009 (2006)
13.	Tackling Health Inequalities, A Programme for Action (2003)
14.	Every Child Matters: Change for Children (2004)
15.	PPS 1: Delivering Sustainable Development (2005)
16.	Planning Policy Statement: Planning and Climate Change, Supplement to PPS 1 (2007)
17.	PPS 3: Housing (2006)
18.	PPG 4: Industrial, Commercial Development and Small Firms (2001)
19.	PPS 6: Planning for Town Centres (2005)
20.	PPS 9: Biodiversity and Geological Conservation (2005)
21.	PPS 10: Planning for Sustainable Waste Management (2005)
22.	PPS 12: Local Spatial Planning (2008)
23.	PPG 13: Transport (2001)

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Reference	
24.	PPG 15: Planning and the Historic Environment (1994)
25.	PPG 16: Archaeology & Planning (1990)
26.	PPG 17: Planning for Open Space, Sport & Recreation (2002)
27.	PPS 22: Renewable Energy (2004)
28.	PPS 23: Planning and Pollution Control (2004)
29.	PPS 25: Development and Flood Risk (2006)
30.	Circular 05/2005 Planning Obligations (2005)
31.	Planning Obligations: Practice Guidance (2006)
Regional / London	
32.	The London Plan, Spatial Development Strategy for Greater London, Consolidated with Alterations since 2004 (2008)
33.	The Mayor's Climate Change Action Plan, Action Today to Protect Tomorrow (2007)
34.	Water Matters, The Mayor's Draft Water Strategy (2007)
35.	Mayor of London Sub Regional Development Framework for East London (2006)
36.	Draft Supplementary Planning Guidance, Planning for Equality and Diversity in London (2006)
37.	Draft Supplementary Planning Guidance, Providing for Children and Young People's Play and Informal Recreation (2006)
38.	Reducing Health Inequalities, Issues for London and Priorities for Action (2007)
39.	Sustainable Design and Construction Supplementary Planning Guidance (2006)
40.	The Mayor's Economic Development Strategy, Sustaining Success (2005)
41.	The Mayor's Cultural Strategy, London: Cultural Capital, Realising the Potential of a World Class City (2004)
42.	The Mayor's Energy Strategy, Green Light to Clean Power (2004)
43.	The Mayor's Municipal Waste Management Strategy, Rethinking Rubbish in London (2003)
44.	A Sustainable Development Framework for London (2003)
45.	The Mayor's Biodiversity Strategy, Connecting with London's Nature (2002)
46.	The Mayor's Air Quality Strategy, Cleaning London's Air (2002)
47.	The Mayor's Transport Strategy (2001)
48.	Thames Gateway Interim Plan, Policy Framework & Development Prospectus (2006)
49.	London Thames Gateway Development and Investment Framework (2004)
50.	Strategic Flood Risk Assessment of East London (2005)
51.	South East London Housing Strategy 2006-2010 (2006)
Local / Borough	
52.	Bexley Together, Bexley's Sustainable Community Strategy 2008-18 (2008)
53.	Bexley Council Unitary Development Plan (2004), in accordance with Direction received from the Secretary of State from 28 September 2007
54.	Affordable Housing Supplementary Planning Document (2006)
55.	Sustainable Design and Construction Guide Supplementary Planning Document (2007)
56.	Design for Living, Residential Design Guide Supplementary Planning Document (2006)

4 Sustainability Objectives, Baseline and Context

	Reference
57.	Local Implementation Plan 2005/6 to 2010/11 (2006)
58.	Regeneration Framework for Bexley 2005-16 (2005)
59.	Bexley Community Safety Strategy 2005-08 (2005)
60.	London Borough of Bexley Crime and Disorder Audit (2004)
61.	Knowing Bexley, Economic and Employment Development Strategy 2005-10 (2005)
62.	Consultation Draft Economic and Employment Development Plan 2007-10 (2007)
63.	Bexley Visitor's Strategy (2005)
64.	Draft Strategy for Skills Training for Sustained Economic and Employment Growth in Bexley and the Thames Gateway 2007-2011 (2007)
65.	Bexley Heath Inequalities Strategy (2005)
66.	Bexley Council Supporting People Five Year Strategy 2005-10 (2005)
67.	London Borough of Bexley Homelessness Strategy 2003-2008 (2003)
68.	Change for Children, Bexley's Children and Young Peoples Plan 2006 – 2009 (2006)
69.	Bexley Playing Pitch Strategy, From Jumpers to Goalposts – Playing Pitches in Bexley (2005)
70.	Developing Communities through Sport: Sports Strategy and Strategic Plan 2003-2008 (2004)
71.	Bexley's Education Development Plan 2002-2007 (2002)
72.	Our Culture, A Cultural Strategy for the London Borough of Bexley (2002)
73.	Managing the Marshes Strategy (2006)
74.	Bexley's Biodiversity Action Plan (2002)
75.	Trees and Woodlands Strategy (Not dated)
76.	Bexley Parks Strategy (Not dated)
77.	Consultation Draft Open Space Strategy (2008)
78.	Local Agenda 21 Strategy (1999)
79.	Updating and Screening Assessment of Local Air Quality in the London Borough of Bexley (2004)
80.	Sustainable Energy Strategy (2001)
81.	Waste Minimisation and Recycling Plan 1999-2004 (1999)

Table 4.1 Policies, Plans, Programmes and Sustainable Development Objectives

- 4.4** Key policy context underpinning the Supplementary Planning Document is established by the Government's Planning Policy Statements (PPS), Guidance (PPG) and Circulars. Of particular importance are *Planning Policy Statement 1: Delivering Sustainable Development*, *Circular 05/2005 Planning Obligations* and the *Planning Obligations: Practice Guidance*.
- 4.5** Policies and strategic objectives of the *London Plan* are also relevant as they set the contextual basis from which the Borough should seek planning obligations, particularly in supporting regional development.
- 4.6** The London Borough of Bexley's saved *Unitary Development Plan* policies are also significant to plan preparation.
- 4.7** The above list of relevant documents is extensive, reflecting the wide scope planning obligations may carry in contributing towards sustainable development. Production of the SPD was undertaken

Sustainability Objectives, Baseline and Context 4

in broad recognition of the relevant social, economic and environmental policy context. Such consideration should provide for the achievement of a robust planning document.

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

- 4.8** The London Borough of Bexley's Sustainability Appraisal objectives have been derived in regard of local baseline data. This information has set the basis for identifying key sustainability issues by broadening understanding of the social, environmental and economic situation of the Borough and its residents, particularly in respect of benchmarks, comparators and indicators of change.
- 4.9** Baseline data is critical for predicting and monitoring effects of planning documents. The data establishes the technical framework for assessing how the Borough is performing in social, environmental and economic terms. Baseline data effectively functions as a gauge against which it is possible to consider and continually assess the beneficial or detrimental effects of implementing a plan.
- 4.10** 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."
- 4.11** For the *Planning Obligations Guidance SPD*, a baseline database has been established to meet the requirements of the *Strategic Environmental Assessment Directive*. The baseline collates data relevant to the the geographic area of Bexley Borough, as exhibited in **Map 4.1**.



Map 4.1 London Borough of Bexley context

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4.12 Baseline information relevant to the draft *Planning Obligations Guidance SPD* is provided in **Appendices B, C, D and E**.

Data gaps and limitations of baseline information

4.13 The baseline for Sustainability Appraisal of the *Planning Obligations Guidance SPD* is informed by the baseline currently being derived for Bexley's *Core Strategy* Local Development Document.

4.14 Information accumulated to-date (and throughout the Sustainability Appraisal Scoping Report stage for the *Core Strategy*) is comprised of a wide range of social, environmental and economic data-sets. These data-sets function as indicators for assessing key areas of performance and concern, as well as areas requiring potential improvement.

4.15 The baseline is an evolving work-in-progress. It is subject to continual monitoring and is frequently updated as new information is made available. The data contributes a broad analytic base for Sustainability Appraisal. It allows an indicative understanding of how implementation of planning documents may assist in delivering sustainable development. The baseline is also useful as a monitor highlighting data gaps requiring further information.

4.16 It is worth noting factors limiting the baseline research process, as well as limitations on data monitors themselves.

4.17 In general, a principal restraint on the baseline is the absence of a central database at the London Borough of Bexley. Though actions are being undertaken to better address the requirements of Sustainability Appraisal, the current reality is that information is in some instances not readily accessible. Data collection is often reliant on the goodwill of Council Officers to provide information in a timely manner, and this requirement is not always consistent with program priorities.

4.18 Additional factors limiting the Sustainability Appraisal baseline are as follows:

- Multiple data-gaps have been identified as requiring further investigation, principally to determine whether information at an appropriate local level is either available or fit for purpose;
- Uncertainty on whether or not there have been any significant cumulative, synergistic or indirect effects over time; and
- Predicting future trends with an emerging data set is made difficult (discussed below).

4.19 With particular regard to the *Planning Obligations Guidance SPD*, key topic areas and indicators requiring further, more comprehensively developed and locally relevant baseline data monitors include:

- Quality of surroundings - monitors to assist with quantifying quality;
- Quality of landscape and townscape - monitors to assist with quantifying quality;
- Biodiversity - several indicators within topic area;
- Climate change - including development impacts and renewable energy monitors;
- Flood risk - particularly in terms of impact assessment;
- Transport - several indicators within topic area; and
- Economy - particularly in terms of attracting inward investment.

Current and likely future situation

4.20 As noted, there is a certain difficulty in predicting long-term trends on the basis of existing baseline data. This is due in part to the reality that data-sets have only recently been accumulated, limiting

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possibilities for comparative year-over-year analysis. Furthermore, the current baseline may in the future be impacted by unforeseen factors, or those factors beyond the scope of study control.

- 4.21 It is expected that once Bexley's Sustainability Appraisal baseline is further developed, both in terms of age of data-sets and quality of available information, the task of identifying trends will be made more manageable.
- 4.22 The current understanding is based on the best available information at the current time. Whilst the London Borough of Bexley will aim to maintain the existing collection of indicators for review consistency, it is acknowledged that slight modifications of the baseline may occur through time.
- 4.23 The current and likely future situation of baseline information relevant to the Planning Obligations Guidance SPD is provided in **Appendices B, C, D and E**.

Main social, environmental and economic issues and problems identified

- 4.24 An important exercise in Sustainability Appraisal is to identify the key sustainability issues affecting the Supplementary Planning Document. This includes consideration of environmental problems and issues, as required by the *Strategic Environmental Assessment Directive*.
- 4.25 Key sustainability issues pertinent to the *Planning Obligations Guidance SPD* are summarised in **Table 4.2** below. These issues have been identified in regard of baseline information and data trends therein, where discernable. Further, **Appendix F** provides a detailed summary of key sustainability issues and opportunities in the context of the Borough's Sustainability Appraisal objectives.

Key Sustainability Issues and Problems	Source	Opportunities / Implications	Relationship to Sustainability Appraisal Objective
<i>Social</i>			
Provision of and access to essential services including open space.	Strategic Planning and Development – review of baseline information	Opportunities to negotiate planning obligations on provision for open space, as well as improving access and accessibility to open spaces, sustainable modes of transport and accessibility for those less abled.	Covered by objectives 1 & 4
Adequate access to public transport, ease of movement and safety.	Bexley Local Implementation Plan – review of other plans and programmes	Opportunities to negotiate planning obligations on sustainable modes of transport and accessibility for those less abled.	Covered by objectives 1 & 14
Fuel poverty.	Bexley Council Energy Conservation Team – personal comments	Opportunities to negotiate planning obligations on measures to improve energy efficiency and reduce carbon dioxide emissions, as well as funding agreement for renewable energy technologies.	Covered by objective 3
Deprivation, exclusion and inequalities and disparities that exist within the borough for	Index of Multiple Deprivation 2004 – review of baseline information	Opportunities to negotiate planning obligations on off-site sustainable design elements to contribute to a healthier and safer environment, as	Covered by objective 5

4 Sustainability Objectives, Baseline and Context

Key Sustainability Issues and Problems	Source	Opportunities / Implications	Relationship to Sustainability Appraisal Objective
example, health, crime, income and employment.		well as funding agreement for socio-economic development programs, such as skills and training.	
Crime levels and fear of crime.	Bexley Crime and Disorder Audit 2004 – review of baseline information; Bexley Performance Plan 2007/08 – review of baseline information	Opportunities to negotiate planning obligations on crime and disorder prevention, including prevention through offer of off-site measures and CCTV.	Covered by objective 6
Low resident satisfaction with leisure and culture facilities.	Bexley's Performance Plan 2007/08 - review of baseline information	Opportunities to negotiate planning obligations on leisure and culture facilities.	Covered by objective 6
Low educational attainment, as reflected in overrepresentation in lower National Vocational Qualifications qualifications.	Office for National Statistics, Labour Force Data - review of baseline information	Opportunities to negotiate planning obligations for education, as well as socio-economic development programs, such skills and training.	Covered by objectives 2 and 16
Environmental			
Poor air quality and designation of whole of Borough as an Air Quality Management Area.	Updating and Screening Assessment of Local Air Quality in the London Borough of Bexley 2004 – review of baseline information; London Air Quality Network – review of baseline information; Air Quality Management Variation Order 2007 - review of baseline information	Opportunities to negotiate planning obligations on energy efficient technologies and measures that contribute to improved air quality.	Covered by objective 7
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	Opportunities to negotiate planning obligations on habitat protection and enhancement.	Covered by objective 8
Need to reduce carbon dioxide emissions – a significant contributor to climate change.	London Atmospheric Emissions Inventory 2002 and Report 2005, Greater London Authority – review of baseline information	Opportunities to negotiate planning obligations on environmental technologies, particularly those that function to improve energy efficiency, reduce carbon dioxide emissions and promote renewable energy.	Covered by objective 9
Risk of tidal, fluvial and sewerage flooding.	Environment Agency - review of baseline information	Opportunities to negotiate planning obligations on flood risk management infrastructure construction and maintenance, including Sustainable Urban Drainage Systems and soft	Covered by objectives 9 and 11

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Key Sustainability Issues and Problems	Source	Opportunities / Implications	Relationship to Sustainability Appraisal Objective
		landscaping, as well as funding agreements on river re-naturalisation.	
Maintain and enhance the quality of open spaces, landscapes and townscapes.	Bexley Performance Plan 2007/08 – review of baseline information	Opportunities to negotiate planning obligations on provision and enhancement of open space and public realm improvement, as well as funding agreement on design improvements to strengthen town centre integration and linkage.	Covered by objective 12 and 16
Need to preserve and enhance built heritage and historic and archaeological environment.	Bexley Sustainable Community Strategy – review of other plans and programmes	Opportunities to negotiate planning obligations on built heritage and historic preservation and enhancement, as well as funding agreement on building retrofit.	Covered by objective 10
Need to improve the quality of land.	Local Agenda 21 Strategy – review of other plans and programmes	Opportunities to negotiate planning obligations on off-site contaminated land remediation, as well as funding agreement in contribution to bringing brownfield land into more active and beneficial use.	Covered by objective 13
Need to improve water quality – a risk of groundwater contamination.	Environment Agency – review of baseline information	Opportunities to negotiate planning obligations on infrastructure to mitigate surface water runoff, including Sustainable Urban Drainage Systems.	Covered by objective 13
High water consumption.	Thames Water – review of baseline information	Opportunities to negotiate planning obligations on corporate water conservation and efficiency measures, as well as funding agreement on Sustainable Urban Drainage Systems and sustainable technologies to reduce treated water use.	Covered by objective 13
High car ownership levels, 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	Opportunities to negotiate planning obligations on sustainable transport modes, travel plans and pedestrian right-of-way enhancements, as well as funding agreement on provision for off-site bicycle facilities.	Covered by objectives 6 and 14
High domestic waste production and need for waste minimisation and recycling.	Bexley Performance Plan 2007/08 – review of baseline information	Opportunities to negotiate planning obligations on corporate sustainable waste management infrastructure and programs.	Covered by objective 15
Commercial sector is experiencing significant increases in energy consumption.	Mayor of London Energy Strategy: Green Light to Clean Power, 2004	Opportunities to negotiate planning obligations on renewable energy technology.	Covered by objective 9

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Key Sustainability Issues and Problems	Source	Opportunities / Implications	Relationship to Sustainability Appraisal Objective
<i>Economic</i>			
There are skill shortages in higher-skill occupations and emerging growth sectors.	Knowing Bexley, Economic and Employment Development Strategy - review of other plans and programs, and review of baseline information	Opportunities to negotiate planning obligations for education, as well as socio-economic development programs, such skills and training.	Covered by objectives 2 and 16
Skill levels in the Borough are below the London average.	Knowing Bexley, Economic and Employment Development Strategy; Office for National Statistics, Labour Force Data - review of baseline information	Opportunities to negotiate planning obligations for education, as well as socio-economic development programs, such skills and training.	Covered by objectives 2 and 16
Adults with low literacy and numeracy levels.	Improving Basic Skills - Education is Our Future: A Strategy and Plan for Action 2004-2007 - review of other plans and programmes	Opportunities to negotiate planning obligations for education, as well as socio-economic development programs, such skills and training.	Covered by objectives 2 and 16
Tourist infrastructure needs to be further developed.	Bexley Council Visitor's Strategy 2005	Opportunities to negotiate planning obligations on tourist infrastructure, including visitor site maintenance, site signage, cultural landmarks and promotional resources.	Covered by objectives 16 and 18
Many of the Borough's Employment Areas are of poor environmental or aesthetic quality.	Knowing Bexley, Economic and Employment Development Strategy - review of other plans and programmes	Opportunities to negotiate planning obligations for sustainable design and construction features, as well as agreement for public realm improvements in Employment Areas.	Covered by objectives 12,13 and 18

Table 4.2 Planning Obligations Guidance Supplementary Planning Document Key Sustainability Issues

The sustainability appraisal framework, including objectives, targets and indicators

- 4.26** The Sustainability Appraisal framework provides a template for the identification, analysis and comparison of sustainability effects of plan implementation. The framework is fundamental to the Sustainability Appraisal process.
- 4.27** 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.
- 4.28** Bexley's general approach to the development of the Sustainability Appraisal Framework has been to apply the Sustainability Appraisal objectives developed for the Core Strategy to other Bexley Local Development Documents.
- 4.29** Seventeen Sustainability Appraisal objectives were initially developed in correspondence with the London Borough of Bexley's appraisal framework. However, following consultation on several Supplementary Planning Documents in 2006, an additional Sustainability Appraisal objective was added to the framework, for a total of eighteen. The noted SPD consultations influencing

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this action included: *Sustainability Appraisal Scoping Report for the Sustainable Design and Construction Guide, Bexleyheath Civic Offices Planning Brief and Lamorbey Planning Brief.*

4.30 Appendix F of the Sustainability Appraisal Report Appendices presents the Sustainability Appraisal framework applied in appraisal of the *Planning Obligations Guidance SPD*.

5 Plan Issues and Options

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

- 5.1** It is important that objectives of the *Planning Obligations Guidance SPD* align with principles of sustainable development. To ensure such alignment, the Draft SPD objectives were assessed for compatibility with the Borough's Sustainability Appraisal objectives. **Appendix G** of the Sustainability Appraisal Report Appendices exhibits an assessment matrix and results of compatibility testing.
- 5.2** The *Planning Obligations Guidance SPD* is unique from most other planning documents, inasmuch as its objectives are underscored by an overt procedural policy focus. This point is demonstrated by **Appendix G** of the Sustainability Appraisal Report Appendices, where the objectives are described. Whilst the objectives of the SPD are procedural in basis, they are underscored by the intention to support the London Borough of Bexley's strategic aim to deliver sustainable development.
- 5.3** At the compatibility testing stage, the Draft SPD clearly articulated the plan's overall function to carry forward the Government position of PPS1 to ensure 'development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities' (PPS1: Paragraph 5). Accordingly, the broad scope of the Supplementary Planning Document was assessed as aligning with sustainability principles.
- 5.4** With particular reference to **Appendix G** and cross-comparison for compatibility, it followed from above that the Draft SPD objectives were assessed as compatible with Sustainability Appraisal objectives.
- 5.5** In instances where positive compatibility was not indicated, it was due to uncertainty as to whether the document explicitly addressed an objective. At the Draft SPD stage, only 3 of the Borough's 18 Sustainability Appraisal objectives were appraised as neutral (not addressed). Furthermore, there were no identified 'possible conflicts' between the Draft SPD and objectives. This latter testing result further reinforced the point of compatibility.
- 5.6** Notably, the adoption Supplementary Planning Document has been revised to reflect compatibility with all of the Borough's Sustainability Appraisal objectives. These revised results are not exhibited in **Appendix G** as the exercise is a requirement pertinent to the Draft document and its early production stages.

Task B2 - Developing the SPD options

- 5.7** Sustainability Appraisal Guidance recommends that the Local Planning Authority appraise in broad terms the effects of strategic options of the Supplementary Planning Document, and to then progress with a more detailed assessment of effects of preferred options once they are selected.
- 5.8** 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

- 5.9** Planning obligations can be used by Local Authorities as a tool to help ensure that growth and development occur in such a way as to support and promote sustainable development. The London Borough of Bexley intends to secure planning obligations on this basis. The

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Supplementary Planning Document is therefore important procedural policy. In view of delivering sustainable development, the SPD will assist the Borough in formalising processes for negotiating Section 106 agreements, as well as setting transparent protocols for calculating and monitoring obligations.

- 5.10** In the early production stages, four options were considered for progressing the *Planning Obligations Guidance SPD*. The options were as follows:

Option 1: Continue with the existing arrangement, based on case by case negotiation, applying precedents from previous negotiations;

Option 2 : Formalise the existing arrangements, introducing administrative improvements (eg the use of 'model' agreements etc), and the use of formulae or standard charges. This Option would be restricted to services and impacts covered by agreements negotiated to date;

Option 3: As for Option 2, but exploring justification for adding new services and needs to the requirements; and

Option 4: As for Option 3, but also exploring whether to apply different standards and other simplified arrangements to smaller applications with lower size thresholds (eg affordable housing requirements).

- 5.11** The *Planning and Compulsory Purchase Act 2004* articulates a duty for those preparing Supplementary Planning Documents to contribute to progressing sustainable development. In early production phases of the SPD therefore, key consideration was made to improve the situation likely to exist in the absence of a relevant planning document. The 'no SPD' option, to rely on the Borough's saved Unitary Development Plan policies, was considered as Option 1. This option presented a baseline against which it was possible to assess other, potentially more progressive alternatives.

- 5.12** An options appraisal was also completed for planning obligation contribution areas, as well as priorities on those areas. Eight options were considered for the contributions, as follows:

Option A: Affordable Housing;

Option B: Transport, Access & Public Realm Improvements (including cycling, walking, town centre & security);

Option C: Education;

Option D: Economic Development, Employment & Training;

Option E: Health Services & Facilities;

Option F: Open Space, Public Realm & Public Art;

Option G: Open Space, Sports & Leisure Facilities; and

Option H: Local Community Facilities & Services.

- 5.13** It should be noted, for organisational purposes some of the above contribution areas have been re-grouped in the adoption Supplementary Planning Document. As such, the contributions do not appear precisely in the document as they do here. Despite this minor revision the broad contribution areas have remained the same, and appraisals of anticipated effects have therefore remained consistent.

- 5.14** Three options were considered for planning obligation priorities, as follows:

Option A: Priority for provision of infrastructure and costs (ensures that contributions go towards the provision of priority or essential infrastructure, but lower priority infrastructure and facilities may not receive any contribution);

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Option B: Require contributions for all types of infrastructure, based on a standard contribution for each (but pro-rata down the contribution for each element equally); and

Option C: High and medium priorities for provision of infrastructure (pro-rata down the contribution for medium priorities only).

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

Supplementary Planning Document Options

- 5.15** The four identified Supplementary Planning Document options were compared against the Borough's Sustainability Appraisal objectives, as detailed in **Appendix F** of the Sustainability Appraisal Report Appendices. The anticipated effects of the SPD options on the Sustainability Appraisal objectives were predicted. Results of this comparative exercise are exhibited in **Appendix H**, with comments included where appropriate. **Table 5.1** below provides a summative account of the options appraisal.
- 5.16** The strategic options appraisal was conducted in regard of the London Borough of Bexley saved *Unitary Development Plan* policies and the *Planning Obligations Guidance SPD Sustainability Appraisal Scoping Report*.
- 5.17** The methodology employed for the Supplementary Planning Document options appraisal involved the following actions:
1. Analysing the four options in view of broader planning obligations considerations, and then predicting their effect on the Sustainability Appraisal objective;
 2. Presenting in Option 1 the relevant saved *Unitary Development Plan* policies that the Borough would apply in the absence of the *Planning Obligations Guidance SPD*, and predicting Option 1 effects on Sustainability Appraisal objectives;
 3. Assessing Options 2, 3 and 4 against the predicted effects of the relevant saved UDP policies, taking into account available baseline information and potential obligation areas of the SPD.

Sustainability Appraisal objective	Option:	1	2	3	4
1: Accessibility		?	?	+	++
2: Education & skills		O	O	+	++
3: Housing		?	?	?	++
4: Human health		+	+	+	++
5: Prosperity & inclusiveness		O	O	?	?
6: Quality of surroundings		O	O	+	++
7: Air quality		?	?	?	?
8: Biodiversity		+	+	++	++
9: Climate change		?	?	?	?
10: Cultural heritage		O	O	+	+
11: Flood risk		O	O	O	O

Plan Issues and Options 5

Sustainability Appraisal objective	Option:	1	2	3	4
12: Landscapes, townscapes & open spaces		+	+	++	++
13: Land, soil & water		+	+	+	++
14: Transport		+	+	++	++
15: Waste management		O	O	O	O
16: Economic growth		O	O	O	O
17: Employment		O	O	+	++
18: Investment		?	?	?	?
Key to table					
Symbols / Likely effects on the SA objectives	Totals				
++ / Major positive	0	0	3	10	
+ / Minor positive	5	5	7	1	
O / Neutral	8	8	3	3	
? / Uncertain; insufficient information to determine	5	5	5	4	
- / Minor negative	0	0	0	0	
-- / Major negative	0	0	0	0	

Table 5.1 Summary of SPD Options Appraisal

- 5.18 Overall, the strategic options appraisal concluded that Options 3 and 4 were more likely to result in positive effects on the Sustainability Appraisal objectives than Options 1 and 2. As the summative **Table 5.1** demonstrates, Options 1 and 2 presented no major positive effects on the Sustainability Appraisal objectives. Such was not the case with Options 3 and 4 however, where multiple major positive or highly beneficial effects were predicted.
- 5.19 Accordingly, the appraisal identified Options 3 and 4 as the most sustainable alternatives for progressing the *Planning Obligations Guidance SPD*.
- 5.20 A key factor influencing the more positive appraisal on Options 3 and 4 was the augmented scope for addressing Sustainability Appraisal objectives. This factor associated with the additional capabilities for the Council to progress sustainable development, specifically through exploring justification for new services and requirements, as well as different threshold arrangements. These unique capabilities reflected a remit for planning obligations beyond that provided by the *Unitary Development Plan*, whether applied as status quo or a more formalised format.

Contribution Options

- 5.21 The eight contribution area options were compared against the Borough's Sustainability Appraisal objectives, as detailed in **Appendix F** of the Sustainability Appraisal Appendices. The anticipated effects of the Supplementary Planning Document contribution area options were predicted. Results of the comparison exercise are exhibited in **Appendix H**, with comments included where appropriate. **Table 5.2** below provides a summative account of the contribution area options appraisal.
- 5.22 Notably, the contribution area options appraisal was conducted in regard of the London Borough of Bexley saved *Unitary Development Plan* policies and the *Planning Obligations Guidance SPD Sustainability Appraisal Scoping Report*.

5 Plan Issues and Options

5.23 The methodology employed for the Supplementary Planning Document contribution area options appraisal involved the following actions:

1. Considering the eight contribution area options in view of broader planning obligations considerations, against each other and then predicting their effect on the Sustainability Appraisal objectives; and
2. Conducting appraisal to develop informed perspective of those 'contribution areas' that should be prioritised, drawing direct linkage to baseline data and related Sustainability Appraisal work.

Sustainability Appraisal objective	Option:	A	B	C	D	E	F	G	H
1: Accessibility		++	++	O	O	++	O	O	++
2: Education & skills		O	O	++	++	O	O	O	+
3: Housing		++	O	O	O	O	O	O	O
4: Human health		O	+	O	O	++	++	++	+
5: Prosperity & inclusiveness		+	+	++	++	+	+	++	++
6: Quality of surroundings		O	+	O	O	O	++	++	++
7: Air quality		O	?	O	O	O	O	O	O
8: Biodiversity		O	O	O	O	O	++	++	O
9: Climate change		O	?	O	O	O	O	O	O
10: Cultural heritage		O	O	O	O	O	+	O	O
11: Flood risk		O	O	O	O	O	O	O	O
12: Landscapes, townscapes & open spaces		O	O	O	O	O	++	+	O
13: Land, soil & water		O	O	O	O	O	O	O	O
14: Transport		O	++	O	O	O	+	O	O
15: Waste management		O	O	O	O	O	O	O	O
16: Economic growth		O	+	O	++	O	O	O	O
17: Employment		O	+	+	++	O	O	O	++
18: Investment		O	?	?	++	?	O	O	?
Key to table									
Symbols / Likely effects on the SA objectives		Totals							
++ / Major positive		2	2	2	5	2	4	4	4
+ / Minor positive		1	5	1	0	1	2	1	2
O / Neutral		15	8	14	13	14	12	13	11
? / Uncertain; insufficient information to determine		0	3	1	0	1	0	0	1

Plan Issues and Options 5

Sustainability Appraisal objective	Option:	A	B	C	D	E	F	G	H
- / Minor negative		0	0	0	0	0	0	0	0
-- / Major negative		0	0	0	0	0	0	0	0

Table 5.2 Summary of SPD Contributions Options Appraisal

5.24 Overall, the contribution area options appraisal demonstrated positive effects on the Borough's Sustainability Appraisal objectives. Notably, there were no minor or major negative effects predicted. Furthermore, the analysis exhibited a particularly positive series of results on the Borough's social Sustainability Appraisal objectives. Some positive effects on economic objectives were also exhibited.

5.25 Whilst the contribution area options appraisal demonstrated positive effects on the whole, there were notable neutral effects assessed on the Borough's environmental Sustainability Appraisal objectives. In instances when positive appraisals on environmental objectives were exhibited, the results were typically linked to effects related to the contribution area of open space. Therefore, the appraisal indicated a potential limited scope of the Supplementary Planning Document in addressing the Borough's environmental sustainability objectives.

5.26 The following is a brief synopsis of the identified contribution areas as they were appraised, by category:

Affordable housing - contributions exhibit positive effects on only three of the eighteen objectives;

Transport, access and public realm improvements - contributions exhibit positive effects in all categories - social, environmental and economic;

Education - contributions exhibit major positive social effects and a minor positive economic effect;

Economic development, employment and training - contribution exhibit significant positive effects on social and economic objectives;

Health services and facilities - contributions exhibit notable major positive impacts on social sustainability objectives, although effects are generally limited otherwise.

Open space, public realm & public art - contributions result in some positive impacts on environmental objectives;

Open space, sports and leisure facilities - contributions on open space result in positive environmental effects, and contributions on sports and leisure facilities result in a significant positive effects;

Community facilities and services - given all contribution area, obligations on local community facilities and services were exhibit the highest positive effect on social objectives.

Priority Options

5.27 The three priority options were compared against the Borough's Sustainability Appraisal objectives, as detailed in **Appendix F** of the Sustainability Appraisal Report Appendices. The anticipated effects were predicted and results are exhibited in **Appendix H**. A summative account of results is shown below in **Table 5.3**.

5 Plan Issues and Options

5.28 Notably, the priority options appraisal was conducted in regard of the London Borough of Bexley saved *Unitary Development Plan* policies and the *Planning Obligations Guidance SPD Sustainability Appraisal Scoping Report*.

5.29 The methodology employed for the general appraisal of the priority options involved:

1. Considering the three priority options and predicting their effect on the Sustainability Appraisal objectives.

Sustainability Appraisal objective	Option:	A	B	C
1: Accessibility		?	?	?
2: Education & skills		?	?	?
3: Housing		?	?	?
4: Human health		?	?	?
5: Prosperity & inclusiveness		?	?	?
6: Quality of surroundings		?	?	?
7: Air quality		?	?	?
8: Biodiversity		?	?	?
9: Climate change		?	?	?
10: Cultural heritage		?	?	?
11: Flood risk		?	?	?
12: Landscapes, townscapes & open spaces		?	?	?
13: Land, soil & water		?	?	?
14: Transport		?	?	?
15: Waste management		?	?	?
16: Economic growth		+	+	+
17: Employment		+	+	+
18: Investment		+	+	+
Key to table				
Symbols / Likely effects on the SA objectives		Totals		
++ / Major positive		0	0	0
+ / Minor positive		3	3	3
O / Neutral		0	0	0
? / Uncertain; insufficient information to determine		15	15	15
- / Minor negative		0	0	0
-- / Major negative		0	0	0

Table 5.3 Summary of SPD Priority Options Appraisal

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Option A - Priority for provision of infrastructure and costs (ensures that contributions go towards the provision of priority or essential infrastructure, but lower priority infrastructure and facilities may not receive any contribution)

- 5.30** Whilst the option ensures contributions are dedicated to priority areas in Bexley, there is a risk that lower-ranked priorities may not receive any contributions. Though risk is apparent, the option would address some sustainability needs (priority areas for contributions undetermined at this stage) which would benefit Sustainability Appraisal objectives accordingly. Risk mitigation could be approached through development of a sustainability checklist for Section 106 agreements. Such a checklist would provide for priority option reviews and regular monitoring to ensure sustainability needs are appropriately addressed.

Option B - Require contributions for all types of infrastructure, based on a standard contribution for each (but pro-rata down the contribution for each element equally)

- 5.31** The option ensures that all contributions are distributed equally amongst identified priority areas in Bexley, with all areas receiving a portion of contributions. This likely provides the most balanced approach to ensuring wider benefits on all Sustainability Appraisal objectives. However, the option does present potential risk. Namely, dispersed distribution may limit opportunity to cumulatively apply contributions on specific objectives. Risk mitigation could be addressed through the establishment of funding thresholds for priority contribution areas, subject to regular monitoring to ensure sustainability needs are appropriately addressed.

Option C - High and medium priorities for provision of infrastructure (pro-rata down the contribution for medium priorities only)

- 5.32** This option ensures that contributions are first directed to established high priority local areas, with identified medium priorities receiving pro-rata contributions in the second instance. The option presents similar pros and cons to those discussed for Options A and B above. Whilst sustainability objectives may be addressed for high priority areas, dispersed distribution on medium priority areas may limit opportunity to cumulatively apply contributions on specific objectives. Risk mitigation could again be approached through combined development of a sustainability checklist for Section 106 agreements, and a funding threshold arrangement.

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

- 5.33** Drawing informed perspective from the option appraisal exercises, it was determined that Option 3 would be the most suitable option to take forward in production of the adoption *Planning Obligations Guidance SPD*.
- 5.34** The option was selected because it provided suitable scope for engendering both minor and major positive (beneficial) effects on Bexley's Sustainability Appraisal objectives.
- 5.35** Further, Option 3 was appraised as demonstrating significantly greater potential to leverage sustainable development than Option 1 (or the no Supplementary Planning Document approach), particularly in its assessed capacity to reduce uncertainties on obligations and to provide a clear basis for securing contributions.
- 5.36** Option 3 also presented a more favourable approach than Option 2 as it ensured opportunity to explore justification for adding new services or requirements, over and above those provided by Option 2 (which corresponds strictly with formalised Unitary Development Plan policies).

5 Plan Issues and Options

5.37 Notably, Option 4 resulted in the most positive appraisal of the four options considered. It therefore represented the greatest potential for leveraging highly beneficial effects. However, Option 4 was not progressed for the adoption Supplementary Planning Document due to factors associated with the Government policy framework on contributions, as discussed below.

Scope of Government Circular 05/2005

- 5.38** Government Circular 05/2005 'Planning Obligations' sets out the broad principles as to what may be included in a planning obligation. The principles are articulated in Paragraph B5 of the Circular as five tests which must be met in order for an obligation to be deemed acceptable. Importantly, Paragraph B5(iii) stipulates that obligations must be directly related to the proposed development.
- 5.39** Option 4 was not progressed for the adoption Supplementary Planning Document because it was perceived as potentially compromising policy of Circular 05/2005.
- 5.40** Specifically, the low threshold arrangements proposed for Option 4 were regarded as overextending the reasonable scope of obligations that could be sought. Whilst it was recognised that in some instances lower thresholds might be reasonably applicable, it was determined that a consistent approach on all Borough development was best incorporated into the adoption SPD, with provision included for case-by-case negotiation.
- 5.41** Furthermore, the low threshold arrangements of Option 4 were deemed as potentially undermining the Circular stipulation that planning obligations cannot be used to resolve deficiencies or lack of capacity in existing facilities in the Borough. Whilst the London Borough of Bexley was keen to enhance contribution capture, it was essential that the Supplementary Planning Document be developed in conformity with Government policy.

Other options considered and why these were rejected

- 5.42** No other options outside those presented in this Sustainability Appraisal Report were considered in Supplementary Planning Document production.
- 5.43** Whilst the Council was open to considering other broad strategic options following consultation of the Draft *Planning Obligations Guidance SPD*, representations did not compel such action.

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

- 6.1 Sustainability Appraisal Guidance recommends that in the process of predicting and evaluating social, environmental and economic effects of a Supplementary Planning Document, it is useful to examine "whether the effect will be permanent rather than temporary, and time-scales over which the effect is likely to be observed".
- 6.2 In addition, Sustainability Appraisal Guidance suggests that assessment be made on the certainty or uncertainty of expected effects occurring.
- 6.3 Sustainability Appraisal of the Draft Supplementary Planning Document was performed on the basis that Option 4 was the preferred option progressed in production of the SPD. Importantly, the adoption SPD carried forward Option 3. Unfortunately, miscommunication on the emerging direction of the Draft SPD provided that Option 4 was subject to initial appraisal. Therefore, the following summative account of predicted social, environmental and economic effects of SPD implementation reflects consideration for Option 4.
- 6.4 A note on the appraisal complexities resulting from the above noted miscommunication is included in Section 3 of this Sustainability Appraisal Report, under the subheading 'Difficulties encountered in compiling information or carrying out the appraisal'.
- 6.5 The following analysis collates findings published in **Appendix I** of the Sustainability Appraisal Report Appendices, pertinent to the *consultation* Draft Planning Obligations Guidance SPD. The analysis is therefore consistent with Stages B3 and B4 of the Sustainability Appraisal Guidance, which require consideration of the Draft document.
- 6.6 A revised assessment on predicted social, environmental and economic effects of SPD implementation has been completed for the adoption *Planning Obligations Guidance SPD*. The assessment is included in **Appendix I** of the Sustainability Appraisal Report Appendices of this particular Report. In order to draw clarity to the evolution of the SPD, in particular regard to changes arising from assessment of Option 4 to Option 3, **Appendix I** includes commentary discussing how changes have been addressed. Accordingly, the Appendix is relevant to both the Draft and Adoption documents.
- 6.7 For reference, comprehensive Sustainability Appraisal results on the Draft *Planning Obligations Guidance SPD* are included in the consultation Draft documents. These documents can be accessed via the Council Library or the London Borough of Bexley planning web-site. They can also be made available upon request.

Significant social, environmental and economic effects of the Draft SPD

- 6.8 An appraisal of the anticipated effects of implementing the Draft *Planning Obligations Guidance SPD* was completed. Comprehensive results of the appraisal were published in **Appendix I** of the Sustainability Appraisal Report Appendices of the *consultation* Draft SPD. A summative account of results is provided in this Report.
- 6.9 As noted, the appraisal was conducted on the premise that Option 4 was considered as the preferred option. The methodology involved appraisal of the anticipated short, medium and long term effects of implementing Option 4 against the London Borough of Bexley's Sustainability Appraisal objectives. Particular attention was dedicated to predicting and assessing cumulative impacts of the option.
- 6.10 Option 4 was detailed in the Draft Supplementary Planning Document as follows: formalise the existing Unitary Development Plan arrangements, introduce administrative improvements and

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the use of formulae or standard charges; add new services and requirements; and apply different standards and simplified arrangements to smaller applications with lower thresholds.

- 6.11 For reference, brief commentary on recommendations arising from appraisal of the Draft Supplementary Planning Document are included in **Appendix I** of the Sustainability Appraisal Report Appendices of this Report.
- 6.12 Full comments relevant to Option 4 may be referenced via the **Appendix I** of the Sustainability Appraisal Report Appendices of the *consultation* Draft SPD.
- 6.13 An overview of Option 4 appraisal results on the Borough's social, environmental and economic objectives is included below.

Social Objectives

- 6.14 Implementation of the Draft *Planning Obligations Guidance SPD* was expected to have significant positive effects on the Borough's social sustainability objectives.
- 6.15 Whilst the Sustainability Appraisal predicted neutral effects over the short term, significant positive and major positive effects were anticipated over the medium to long term. These effects were assessed as a result of cumulative impacts, whereby a dedicated resource was accrued and applied through time. The major positive or highly beneficial effects were anticipated for 5 of the London Borough of Bexley's 6 Sustainability Appraisal social objectives, as listed below.
- 6.16 **Draft SPD: Predicted medium to long term highly beneficial effects on social objectives**
 - To improve access to essential services and facilities, especially where there is disadvantage or special need;
 - To improve the education and skills of the population overall;
 - To provide everybody with the opportunity to live in a decent home;
 - To improve the health and well-being of the population; and
 - To reduce poverty and social exclusion.

Environmental Objectives

- 6.17 Implementation of the Draft *Planning Obligations Guidance SPD* was expected to have positive effects on the Borough's environmental sustainability objectives.
- 6.18 There were some uncertainties in predicting environmental effects, however. These uncertainties were appraised for two key reasons. First, the identified obligation was seen as unlikely to explicitly address a Sustainability Appraisal objective, and therefore presented limited scope. Second, the identified obligation's impact on environmental Sustainability Appraisal objectives was seen as potentially compromised by other factors, thereby making prediction difficult.
- 6.19 Whilst the Sustainability Appraisal predicted neutral effects over the short term, significant positive and major positive effects were anticipated over the medium to long term. These effects were assessed as a result of cumulative impacts, whereby a dedicated resource was accrued and applied through time.
- 6.20 **Draft SPD: Predicted medium to long term highly beneficial effects on environmental objectives**

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- To maintain and enhance the quality of landscapes and townscapes including open spaces; and
- To reduce car dependency and encourage sustainable modes of transport.

Economic Objectives

6.21 Implementation of the Draft *Planning Obligations Guidance SPD* was expected to have significant positive effects on the Borough's economic sustainability objectives.

6.22 Whilst the Sustainability Appraisal predicted neutral effects over the short term, significant positive and major positive effects were anticipated over the medium to long term. These effects were assessed as a result of cumulative impacts, whereby a dedicated resource was accrued and applied through time. The major positive or highly beneficial effects were anticipated for 2 of the London Borough of Bexley's 3 Sustainability Appraisal economic objectives, as listed below.

6.23 Draft SPD: Predicted medium to long term highly beneficial effects on economic objectives

- To encourage and accommodate sustainable economic growth; and
- To provide opportunities for rewarding and satisfying employment.

Overall and cumulative effects

6.24 Overall, implementation of the Draft *Planning Obligations Guidance SPD* was anticipated to have a neutral effect on the Borough's Sustainability Appraisal objectives over the short term, with minor positive and major positive effects predicted over the medium and long term respectively.

6.25 It was considered unlikely that the cumulative effect contributions over the short term would be sufficient to provide the funding and/or contributions necessary to dramatically impact on the Borough's existing baseline situation.

6.26 More positive appraisals were demonstrated over the medium and long term because the cumulative effect of contributions was assessed as providing a dedicated resource sufficient to significantly impact on key sustainability objectives.

6.27 Notably, the Sustainability Appraisal concluded that there were opportunities for the *Planning Obligations Guidance SPD* to strengthen results on environmental objectives.

6.28 The Draft SPD was not seen as providing sufficient scope on the Borough's environmental objectives (such as climate change and flood risk). Factors providing for this assessment may be viewed in detail in **Appendix I** of the Sustainability Appraisal Report Appendices of the *consultation* Draft SPD.

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 must be included in the Sustainability Appraisal Report.
- 7.2 Sustainability Appraisal has identified no significant adverse effects of implementing the *Planning Obligations Guidance SPD*. There are therefore no proposed mitigation measures discussed in this Report. However, interim reviews and Sustainability Appraisal of the Draft document have indicated opportunities and measures for enhancing the beneficial effects of the Supplementary Planning Document, and these are detailed below.

Proposed mitigation measures

- 7.3 As part of the iterative appraisal process, an interim review was completed on an emerging Draft document. The interim review functioned to inform early development of the SPD and it provided key direction in continued refinement of the Draft document, particularly from a sustainability perspective. Even at the preliminary stages of plan production, interim appraisal predicted no significant adverse effects of implementing the SPD. Accordingly, there were no early recommendations made for mitigation.
- 7.4 Comments at the interim review stage were generally presented as recommendations for reducing uncertainties and strengthening the positive effects of the SPD.
- 7.5 Multiple recommendations from the interim review were incorporated into a revised Draft *Planning Obligations Guidance SPD* (the Draft document subject to formal consultation). Of particular importance, a recommendation to finalise all methodologies for calculating contributions was addressed. This action was significant as it alleviated general uncertainties in predicting effects of SPD implementation. With methodologies and formulae established, more positive appraisals were achieved from the Draft SPD than earlier emerging Draft documents.
- 7.6 Further recommendations at the early interim review stage were presented, and are as follows:

Social Objectives

- Consider extending scope of SPD to include community facilities and services;
 - Consider extending scope of SPD to include additional 'essential' community facilities;
 - Consider incorporating requirements for CCTV; and
 - Consider broadening the scope of public realm requirements.
- 7.7 All of the above recommendations from the interim review were incorporated into the Draft *Planning Obligations Guidance SPD*.

Environmental Objectives

- Consider Council precedent for contributions on air quality;
- Consider Council precedent for contributions on nature conservation management plan;
- Consider extending the scope of SPD to include contributions on nature conservation and biodiversity;
- Consider extending scope of the SPD to include renewable energy & related infrastructure;
- Consider extending scope of the SPD to include Sustainable Urban Drainage Systems;

- Consider Council precedent for contributions on landscaping; and
- Consider extending scope of the SPD to include contributions on recycling programs and/or facilities.

7.8 The *Draft Planning Obligations Guidance SPD* did not reflect all of the above proposed recommendations from the interim review. However, some recommendations were incorporated into the Draft SPD as additional requirements, or included by way of extended scope. These recommendations were: landscaping and further contributions on nature conservation and biodiversity.

Economic Objectives

- Consider extending scope of the SPD to include affordable business accommodation; and
- Consider extending scope of the SPD to include links to local recruitment and training schemes.

7.9 The latter of these two recommendations was taken from the interim appraisal and incorporated into the Draft SPD.

7.10 As highlighted above, iterative appraisal exercises informed development of the SPD, particularly in the early production stages. As the Supplementary Planning Document progressed from emerging draft document to Draft SPD status, appraisals resulted in a greater frequency and certainty of predicted beneficial effects. This was especially true of the Borough's social sustainability objectives. Thorough response to recommendations on social aspects enhanced the document overall.

7.11 Whilst more beneficial effects were derived from iterative appraisal of the plan, multiple recommendations made at the interim review stage were not addressed and therefore carried over to the *Draft Planning Obligations Guidance SPD*. Recommendations on environmental objectives, in particular, were not addressed to the extent that social objectives were. Accordingly, the Sustainability Appraisal Report on the Draft SPD flagged policy on environmental objectives as requiring further consideration.

Uncertainties and risks

7.12 The principal uncertainty concerning implementation of the *Planning Obligations Guidance SPD*, particularly in respect of realising beneficial effects, is the provision that planning obligations are negotiated on a case-by-case basis.

7.13 The SPD is quite effective in addressing the Borough's social and economic sustainability objectives by way of the SPD Annexes, which detail those obligations likely to arise as a result of Unitary Development Plan policy. The contribution areas indicated by the SPD Annexes set clear expectations on Section 106 Agreements. However, the Annexes do not encapsulate scope for all of the obligations the Council might seek.

7.14 Importantly, Sustainability Appraisal links assessment of predicted effects to Paragraph 3.3 of the SPD. Beneficial effects on the Council's environmental objectives, in particular, draw heavily on the 'other obligations' listed in Paragraph 3.3 (such as climate change adaptation and mitigation; green infrastructure; and flood defences). Whilst 'other obligations' are clearly articulated, the provision for consideration on a case basis presents uncertainty as to whether such obligations will be as uniformly sought or applied as those indicated in the Annexes.

7.15 Another uncertainty relates to the inherent difficulties in predicting broader environmental impacts of plans.

7 Implementation

- 7.16** The Sustainability Appraisal of Objectives 7 and 9, as provided by **Appendix I** of the Sustainability Appraisal Appendices, are especially relevant here. In considering future refinement of the Supplementary Planning Document, reducing the uncertainties of effects on SA Objectives 7 and 9 may prove difficult. This is because the SPD may be limited in scope to effect positive change in the Borough, when other factors may function to compromise gains made by obligations. The case of climate change supports this point, as noted and discussed in **Appendix I**.
- 7.17** Risks concerning the SPD are primarily associated with its implementation and management. There is a risk that potential beneficial effects may not be realised if Unitary Development Plan policies and the Supplementary Planning Guidance are not robustly applied. Likewise, many of the predicted beneficial environmental effects noted by the Sustainability Appraisal draw heavily on scope and linkage to the Council's *Sustainable Design & Construction Guide SPD*. Again, if robust implementation of this plan does not occur then there is a risk that beneficial effects of the *Planning Obligations Guidance SPD* may be compromised.

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

- 7.18** The Sustainability Appraisal Guidance states that where possible, links should be made with other types of appraisal. Current best practice is to incorporate other types of appraisal into the Sustainability Appraisal process. Such practice is undertaken to avoid appraisal duplication and to capitalise on opportunities for procedural synergy.
- 7.19** Synergies have been identified with Health Impact Assessment and Equality Impact Assessment. Where relevant, the Sustainability Appraisal has integrated the objectives of these assessments into the SA objectives. In particular, the following Sustainability Appraisal objectives were included and used to appraise the *Planning Obligations Guidance 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.
- 7.20** 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 is presented as a separate report in **Appendix J – Appropriate Assessment**.
- 7.21** An Environmental Impact Assessment may be applicable to certain developments.

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

- 7.22** The Sustainability Appraisal guidance notes that monitoring is not a separate exercise from the rest of the Supplementary Planning Document Sustainability Appraisal process.
- 7.23** Monitoring provides the actual significant effects of implementing the SPD are tested against those effects predicted in the Sustainability Appraisal.
- 7.24** Monitoring further helps to ensure that any problems or issues arising during plan implementation can be identified, such that future predictions can be more accurately established.

Proposals for monitoring

- 7.25** The indicators presented in the Sustainability Appraisal Framework of **Appendix F** are those proposed for monitoring the effects of the Supplementary Planning Document.
- 7.26** The Council's Annual Monitoring Report (AMR) is particularly important to monitoring, as it provides a regular assessment of the performance of the Borough's existing and new planning policies. Multiple Core Output and Local Output Indicators for monitoring are incorporated into the Sustainability Appraisal Framework.
- 7.27** In addition, three Significant Effects Indicators (SEI) unique to the *Planning Obligations Guidance SPD* have been established. These SEIs will be included in forthcoming Annual Monitoring Reports, and are as follows:

Number of completed planning obligations (section 106 & unilateral agreements)

- 7.28** This is a baseline indicator monitoring the total number of completed planning obligations from commencement of the SPD, calculated annually and cumulatively on a year-over-year basis.

Number & type of planning obligations secured by SPD Annex, including 'other' contributions secured by way of Paragraph 3.3 of the SPD

- 7.29** The SPD provides Bexley with a protocol for securing obligations on multiple service area requirements related to different types of development. This indicator monitors obligation capture by service area (and also relevant service area priority, in cases where viability is an issue).
- 7.30** In addition to service areas, this indicator monitors 'other' site-specific obligations that Bexley secures by way of Paragraph 3.3 of the SPD.
- 7.31** The sustainability of the SPD is enhanced by contribution capture on all of the identified service areas and 'other' site-specific obligations. The indicator provides Bexley with a detailed understanding of the number and type of contributions it secures by way of the SPD.

Percentage of qualifying developments for which planning obligations were successfully secured on approved planning decisions.

- 7.32** Financial viability testing has been conducted on the SPD threshold criteria and related obligations. Such testing should provide that Bexley has established a reasonable cost framework for securing contributions from developers.
- 7.33** The sustainability of the SPD is enhanced by contribution capture on the majority of relevant approved applications. This indicator provides a basis for monitoring viability by earmarking the proportional level of successful contribution capture on approved applications.

8 Consulting on the Draft SPD and SA Report

- 8.1 The *Strategic Environmental Assessment Directive* requires that 'the authorities [with relevant environmental responsibilities] and the public... shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme'.
- 8.2 In accordance with the SEA Directive, the London Borough of Bexley conducted a public consultation on the *Draft Planning Obligations Guidance SPD* and associated Sustainability Appraisal Report and Appendices.
- 8.3 The following section overviews the consultation process and sets out how consultation responses were taken into account in production of the adoption Supplementary Planning Document.

Task D1 - Public Participation on the Draft SPD and SA Report

- 8.4 The *Draft Planning Obligations Guidance SPD* and Sustainability Appraisal Report were subject to formal consultation simultaneously from **07 April** to **19 May 2008**, a six-week period as required by the Local Development Regulations.
- 8.5 In conducting consultation on the Draft Supplementary Planning Document, the London Borough of Bexley sought responses from the statutory consultation bodies - English Heritage, Environment Agency and Natural England - as well as the Greater London Authority and Government Office for London. Local organisations and stakeholders were also informed of the consultation. Furthermore, the London Borough of Bexley notified all public stakeholders on its Local Development Framework consultation database (amounting to approximately 1,200 stakeholders).
- 8.6 Full details of the consultation are provided in this Sustainability Appraisal Report in Section 3 on 'Appraisal methodology'.

Task D2: Assessing Significant Changes

Option Appraisal

- 8.7 As discussed previously in this Report, miscommunication on the preferred option progressed at the Draft stage of SPD production had implications for Sustainability Appraisal. Most notably, strategic Option 4 was assessed at the Draft stage rather than Option 3. This carried implications from a Sustainability Appraisal perspective, as reassessment was required to ensure appraisal appropriately functioned to inform plan production.
- 8.8 In order to rectify discrepancies resulting from the above situation, a comprehensive appraisal was undertaken on the adoption *Planning Obligations Guidance SPD*. Results of the Appraisal are included in **Appendix I** of the Sustainability Appraisal Report Appendices. For reader reference and understanding, the 'comments' section of this Appraisal draws linkage to the Appendix I of the *consultation* Draft Sustainability Appraisal Report Appendices. Whilst the Draft and final Report Appendix I are similar in structure, their content is premised on different Options. Therefore, it is necessary to discuss appraisal in the context of significant changes.
- 8.9 As indicated in Section 3 on 'Appraisal methodology' the key difference between Options 3 and 4 relates to threshold arrangements for negotiating planning obligations. The options are substantively similar, otherwise. Accordingly, the general scope of predicted effects on the Borough's Sustainability Appraisal objectives are largely consistent across the appraisal exercises. That is to say that where Option 3 was assessed as positively addressing a sustainability objective, Option 4 was assessed likewise.

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- 8.10** Strictly from an Option appraisal perspective, differences in the appraisals of the Draft SPD (appraised as Option 4) and adoption SPD (appraised as Option 3) were the result of threshold arrangements. Thereby, the more rigorous thresholds of Option 4 were assessed as providing greater potential for obligation capture and accordingly greater potential for beneficial effects.
- 8.11** Importantly, Sustainability Appraisal of both Option 3 and Option 4 resulted in no predicted negative impact on the London Borough of Bexley's sustainability objectives.

Draft SPD Consultation & Appraisal of Significant Changes

- 8.12** Numerous consultation representations on the Draft *Planning Obligations Guidance SPD* were received. Representations have been collated and outlined in this Sustainability Appraisal Report in **Table 3.4** in Section 3 on 'Appraisal methodology'. The table also includes the London Borough of Bexley's response to the representations.
- 8.13** As a result of consultation on the Draft Supplementary Planning Document, the SPD was subject to a series of revisions. These revisions were finalised and presented in the adoption *Planning Obligations Guidance SPD*. An appraisal of the adoption SPD was undertaken, and results are presented in **Appendix I** of the Sustainability Appraisal Report Appendices.
- 8.14** Notably, consultation representation strongly supported revision of the SPD to better address the Borough's environmental Sustainability Appraisal objectives. Such representation aligned with comments derived at the Draft SPD appraisal stage, where it was noted that the SPD should pursue a stronger environmental policy focus. Supplementary Planning Document revisions ultimately reflected this environmental commentary, as detailed below.
- 8.15** The adoption *Planning Obligations Guidance SPD* includes provisions which significantly enhance the likely beneficial effects of the plan, particularly environmental effects. These provisions are twofold. First, the SPD refers the London Borough of Bexley's *Sustainable Design and Construction Guide SPD*. This document is material consideration in planning applications, drawing key linkage to requirements for environmentally sensitive and sustainable development. Second, the SPD includes a revised scope on 'other obligations' the Council may seek in consideration of planning applications. This scope is detailed in Paragraph 3.3 of the SPD. 'Other observations' are listed as including flood defences and green infrastructure.
- 8.16** The above noted provisions reflect a dedicated response to strengthening environmental benefits of the SPD, but their scope is such that other social and economic benefits are likely to be realised. Further details on such anticipated effects are provided in **Appendix I** of the Sustainability Appraisal Report Appendices. The key point here is that appraisal comments and consultation representation considered and incorporated at the Draft SPD stage have ultimately enhanced the adoption SPD.

Future opportunities for SPD enhancement

- 8.17** This Sustainability Appraisal Report identifies future opportunities for continued enhancement of the SPD, which are derived in view of assessment of significant changes to the Supplementary Planning Document.
- 8.18** Specifically, opportunities are based on formalising an ongoing process for synthesising planning obligations with Council spending schemes. As provided in **Appendix I** of the Sustainability Appraisal Report Appendices, a key recommendation is to 'consider SPD linkage with relevant updated and/or new Council strategies'.
- 8.19** Presently, the Supplementary Planning Document links contribution spending to the Borough's existing key plans and strategies. Appraisal comments reflect that the Council should pursue

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opportunities for leveraging further beneficial effects in instances where new or revised spending schemes are appropriate to sustainability objectives. The current framework should not restrict adaptation to the Council's evolving strategic objectives and spending priorities, and future review of the SPD is encouraged.

- 8.20** Opportunities for further enhancement of the SPD are noted by the Council's statutory consultation bodies, particularly in regard to environmental objectives. Specific comments and recommendations are provided in **Appendix I** of the Sustainability Appraisal Appendices.

Next steps

- 8.21** As part of the next steps on Sustainability Appraisal of the *Planning Obligations Guidance SPD*, benchmark monitors and monitoring processes will be finalised.
- 8.22** Integration of Significant Effects Indicators into the Council's Annual Monitoring Report will be undertaken, as discussed in Section 7 of this Sustainability Appraisal Report. Further refinement of SEIs for the Planning Obligations Guidance SPD may be considered in the future, should opportunities for enhancing monitoring be identified.
- 8.23** The London Borough of Bexley will monitor effects of implementing the Supplementary Planning Document and consider ways of responding to any identified adverse effects, as well as any assessed opportunities for SPD enhancement.
- 8.24** Further refinement of the Supplementary Planning Document may be required through time as the Council updates, revises or alters the key plans and strategies listed in the SPD and its Annexes.

Methodology for the remaining stages of the Sustainability Appraisal process

- 8.25** The subsequent phases of the Sustainability Appraisal relate to the completion of stages D3 and E of the Sustainability Appraisal process. An outline of the remaining stages and tasks of the Sustainability Appraisal to follow from this Sustainability Appraisal Report is shown in **Table 8.1**.

Supplementary Planning Document Stage 3: Adoption	
Task D3	Making decisions and providing information.
Stage E: Monitoring the significant effects of implementing the Supplementary Planning Document	
Task E1	Finalising aims and methods for monitoring.
Task E2	Responding to adverse effects.

Table 8.1 Sustainability Appraisal Stages D3 and E

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