

**LB of Richmond upon Thames
Core Strategy Development Plan Document**

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)
Adoption Statement**

1.0 Introduction

London Borough of Richmond upon Thames adopted its Core strategy on 21 April 2009. In accordance with regulation 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004 this statement of the Council summarises

- How environmental considerations have been integrated into the Core Strategy
- How the Environmental Report has been taken into account
- How opinions expressed through public consultation have been taken into account
- The reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with
- Measures that are to be taken to monitor significant environmental effects of the implementation of the Core Strategy.

2.0 How environmental considerations have been integrated into the Core Strategy

Planning Policy Statement 12 requires a Sustainability Appraisal (SA) of Local Development Documents. The SA incorporates the requirements of the SEA Directive but broadens them to include social, economic and environmental effects in order to ensure that decisions are made that accord with sustainable development principles. Throughout this statement, reference to SA encompasses the requirements of a merged SA/SEA. Full details of the SA process are set out in the *Final Sustainability Appraisal Report* submitted with the Core Strategy.

The key criteria against which the options and policies of the Core Strategy have been appraised are contained in the SA framework. The SA framework was originally set out in the Scoping Report, and this was reviewed in March 2007 in light of new and emerging policies and programmes, legislative changes and updated background data. An essential part of the process of preparation of the Core Strategy has been to undertake SA to ensure the integration of social, environmental and economic considerations into the development of the strategic objectives and policies and this has been carried out for each key stage of the Core Strategy document's production including: issues & options; preferred options; and submission stages.

The Council proposed a number of pre-examination changes to the Core Strategy. These were prompted by a number of national and regional policy changes and representations received on the submitted Core Strategy. An update of the Core Strategy Submission Sustainability Appraisal was also published alongside the changes; see *Supplementary Sustainability Appraisal* of September 2008. Some further changes were of a minor nature and did not require SA.

3.0 How the environmental report has been taken into account

The SA Report has contributed to the development of strategies and policies by providing assessment of the sustainability of the Council's proposed options and policies through the Core Strategy production process. The SA process involved gathering baseline information and reviewing relevant plans, programmes, strategies and policies to identify sustainability issues of relevance to the borough. From this a set of SA objectives for the Core Strategy were identified. Each option and policy is assessed in terms of its overall balance of impacts on the SA objectives.

The development and appraisal of options is an iterative process, with the options being refined to take account of the appraisal and consultation process. The Preferred Options for the Core Strategy were consulted on in September 2007; Further Issues and Options were considered in the spring of 2007 and together with the earlier 2005 Issues and Options, all of these were Sustainability Appraised. At each stage, where necessary and appropriate, the Core Strategy approach has been developed and modified in line with the findings of the SA to ensure that the chosen policy options are the most sustainable. The assessment matrices are set out in Appendix 1 to the *Final SA Report*.

Following the assessment of the effects of the policies, measures to limit and mitigate the social, economic and environmental impacts of the Core Strategy were identified. These measures are set out in Chapter 4 of the *Final SA Report*.

4.0 How opinions expressed through public consultation have been taken into account

Consultations throughout the SA process has been undertaken in accordance with Article 6 (3) of the SEA Directive, the SEA regulations and LB Richmond upon Thames's Statement of Community Involvement. There are three key bodies that must be consulted: the Environment Agency; English Heritage and Natural England (formerly English Nature and the Countryside Agency). The guidance also states that it is desirable to consult other bodies with social and economic responsibilities as the Council deems appropriate.

Formal consultation on the Scoping Report was carried out with the environmental consultation bodies, community groups, social and economic bodies. In particular comments from the statutory bodies helped shape the SA and following the initial consultation on the Scoping Report, the Council improved the SA framework through rephrasing of some of the objectives.

These bodies, stakeholders and the public also were able to comment on the SA accompanying the documents. The Table below provides a summary of the consultations at each stage of the SA and DPD process.

Sustainability Appraisal & Consultation

Date	Plan Making Stage	SA Document	Details
Spring 2005	Evidence gathering	1.Draft SA Scoping Report 2005	Broad support following consultation on the scope & content of the Scoping Report with relevant statutory bodies, key stakeholders and the public.
Autumn 2005	1 st issues and options consultation	Draft SA Scoping Report, July – Aug 2005	Extensive consultation including a questionnaire to all households
Autumn 2005 – Spring 2007	Processing response to 1 st Issues and Options consultation Research and information studies	2. Progress Report SA of the LDF Issues & Options, Oct.- Dec. 2007	Provided a broad picture of views and concerns
Autumn 2006	Consultation on key issues for the Sustainable Community Plan		The plan of the Local Strategic Partnership for whole Borough was adopted April 2007. The LDF will take forward the

			spatial elements.
April-May 2007	Further Issues and Options consultation	3. SA of the Further Issues & Options 2007	To ensure all evidence considered, all options explored and to consult on the LDF vision, prior to the agreement of the preferred options for the Core Strategy – the further options are based on: -• Further options suggested during the 2005 consultation; • The outcomes of the research studies undertaken; • The options/proposals of the sustainable Community Plan; • The current National and Regional Planning Framework, including the emerging London Plan Review
Sept-Nov 2007	Public consultation on the Preferred Options for the Core Strategy	4. Core Strategy Preferred Options SA Report Sept. 2007	Core Strategy preferred approach developed and modified to ensure that the chosen Preferred Options were the most sustainable.
March 2008	Core Strategy Submission Version	5. Core Strategy Submission Version SA, March 2008	Submission of statement of consultation (Regulation 28 Statement). No comments were made on the SA
Nov – Dec 2008	Examination in public	6. Core Strategy Proposed Pre-examination Changes Supplementary SA, September 2008	Inspector's Report received 2009.
April 2009	Adoption	7. SA adoption statement	

At each stage of the Core Strategy process, the comments received and actions taken have been recorded and are available to the public. The Statement of Consultation (Regulation 28 Statement) sets out in full the consultation undertaken at each stage of the process and the results, below is a summary of key points.

Issues & options consultation

There were 1,017 respondents to the questionnaire consultation and the results of this are summarised in the Issues and Options results of consultation report, 07/07/2006. The results of several consultation workshops carried out are set out in the Statement of Consultation.

The consultation resulted in the main issues being defined as:-

Overall strategy

- The overall strategy within the UDP Review, which emphasises the preservation and enhancement of the environment, remains relevant.
- opportunity to strengthen the Strategy to the include the following:
 - the relevance of the land use and transport policies to climate change;
 - the need to maintain biodiversity;
 - the need for affordable housing;
 - the need to make effective use of limited land;

- the need for the Plan to promote equality of opportunity both in relation to different groups and areas of the Borough.

Climate change

- Need to reduce carbon emissions with policies for the location of major developments, provision of local services, transport, car parking and waste and recycling.
- Specifically need to review policies in relation to energy efficient buildings, renewable energy and flooding
- Use of renewable energy - London Plan Review will potentially seek 20%, needs to be reviewed in local context..

Open land protection

Support for existing policies and opportunities for additional designation, although this may prejudice provision of new housing.

Quality of Design

Support for priority to be given to high quality design

Affordable housing threshold/target

The current UDP Review threshold of “capable of providing 10 or more units” could be lowered, and/or the current target of 40% could be raised to 50% (as in the London Plan) to try to secure more affordable housing, but this could affect viability on certain sites. Existing and higher percentage well supported and a Local Housing Assessment has been commissioned. Options for reducing threshold to be further researched.

Employment land

Need to retain existing land in employment use and consider alternative employment generating uses such as leisure, health or childcare

Town and local centres

- Existing hierarchy of town centres to be maintained and larger retail and employment uses to be steered into the larger town centres of Richmond, Twickenham, East Sheen, Teddington and Whitton.
- new retail provision to meet projected needs of residents supported by a majority of respondents..

Entertainment

- large majority of respondents thought that there should be greater restrictions on entertainment uses

Community

- Newer approaches to the provision of community services including co-location and the private provision of services for the public will require policies to protect and ensure that such services are re-provided where there is redevelopment

Car parking standards

- Large proportion of respondents supported requiring developments to provide sufficient car parking to avoid overflow parking on street.

Preferred options consultation

There was general support for the spatial strategy based on sustainability, protection of the environment, maximising affordable housing, meeting the needs of communities and developing the potential of five main centres. Policies relating to climate change were generally supported. The GLA expressed some concerns about Plan conformity with regard to local district heating networks and an amendment was made to the Submission version.

A key conformity issue raised by GLA was the Preferred Option blanket restriction on tall buildings. Consultants were employed to review the opportunities for higher densities and taller buildings and their work indicated a few town centre areas within the borough where higher densities might be appropriate. The strategy was amended to clarify how such proposals will be treated.

A number of policy wording changes, amendments to objectives to increase local distinctiveness, and a new section on implementation and monitoring were incorporated as a result of the responses received. As a result of the consultation, policies were modified as documented and none of the Core Strategy objectives were found to be inherently incompatible with sustainable development.

Submission consultation

At this stage there were only 30 respondents. Most objections were around policy wording clarification rather than the overall direction of the policies.

Examination

Proposed changes were prompted by a number of representations received to the submitted Core Strategy. A number of updates related to additional evidence including a borough-wide Sustainable Urban Development Study, policies in the recently adopted London plan 2008 and ongoing research for other DPDs. Many of the changes provide greater clarity in the spatial strategy of the plan. An update of the SA was published to highlight any changes in the social, environmental or economic effects arising from the proposed changes. It was found that the changes proposed did not fundamentally affect the strategy and hence the sustainability appraisal of its main effects.

5.0 The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; The Core Strategy Preferred Options document set out three alternative spatial strategies,

Option A – the five centre approach

Principles

- 1. Sustainability across the borough will be at the forefront of the core strategy, especially in relation to buildings and travel.**
- 2. Open spaces and the historic environment will be protected and enhanced.**
- 3. Maximising affordable housing will be a priority across the borough.**
- 4. To provide and protect existing facilities, business and employment opportunities and infrastructure meeting the needs of the community, particularly in the 5 areas of relative disadvantage.**
- 5. The potential of the 5 main centres of Richmond, Twickenham, East Sheen, Whitton and Teddington will be developed, especially for new retailing, employment and higher density housing.**

Option B – the dispersed approach

Principles

- 1, 2, 3 and 4 as for A**
- 5. Any new development for retailing, employment and higher density housing to be permitted across the borough**

Option C – the two centre approach

Principles

- 1, 2, 3 and 4 as for A**
- 5 Focus all new non residential development as well as higher density residential into Richmond and Twickenham town centres only.**

The Options were examined against the National and Regional Policy Framework, the Community Plan and other Local Policies, the consultation and the Sustainability Appraisal, this assessment is

set out in Appendix Two of the Core Strategy submission version. Option A, the five centre approach was preferred for the reasons set out in the appendix.

6.0 The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

The implementation framework is set out at Chapter 8 of the Core Strategy. Targets and indicators for each of the policies of the Core Strategy and also the main delivery agencies are set out in summary tables at the end of each policy. The information monitored will be published each year in the Annual Monitoring Report (AMR) as required by the Planning and Compulsory Purchase Act 2004. The Core Strategy will be reviewed in the light of the results of monitoring and any other significant changes in circumstances.

The success and effectiveness of the SA/SEA process will be monitored by the continued collection of baseline data according to identified indicators. These indicators and their relevant targets are set out in the Annual Monitoring Report. The indicators monitor the significant effects of the plan and identify remedial action required if the trends or targets are not met. AMR indicators are in three categories:

- a) Core output indicators and local output indicators – the main purpose is to monitor measurable physical activities that are directly related to, and are a consequence of the implementation of planning policies. Core indicators are set out in Government guidance;
- b) Contextual – these provide baseline information on social, environmental and economic characteristics;
- c) Other indicators – these are linked to Sustainability Appraisal objectives.

Examples of SA indicators include:

- Renewable energy capacity installed by type
- Number of biodiversity plan objectives achieved
- Percentage of new build and retrofit homes which meet the best practice standards, currently Code for Sustainable Homes level 3, and conversions meeting EcoHomes “excellent”
- Proportion of commercial buildings meeting BREEAM "excellent" standard (or any subsequent new applicable standards).

This information included in the AMR, can be obtained from the Council's website.

7.0 Further Information

The sustainability appraisal of the core strategy and other related documents are available on the Council's website: www.richmond.gov.uk