



London Borough of Bexley

Integrated Impact Assessment – Bexley Local Plan

Post Adoption Statement



April 2023

Report for

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Doc Ref. 852622

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Document revisions

No.	Details	Date
1	Draft for Client	April 2023
2	Final	April 2023

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1. Introduction

1.1 Background

The Bexley Local Plan (hereafter referred to as the 'Local Plan') was adopted by London Borough of Bexley (the Council) on 26th April 2023. The Council submitted the Bexley Local Plan: Submission Version (the Draft Local Plan) to the Secretary of State for Housing, Communities and Local Government (now Levelling-Up, Housing and Communities) on 30th November 2021, in accordance with Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and subsequent examination in public (EiP). Following consultation on Main Modifications (MMs), the Local Plan was found sound by the Inspectors in their report dated 28 February 2023 which included minor changes to the MMs as consulted on.

Preparation of the Local Plan was informed by an Integrated Impact Assessment (IIA), incorporating Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA).

The Council prepared the Scoping Report for the IIA in 2019 and engaged WSP (formerly part of the Wood Group) to prepare the IIA of the Local Plan from August 2019, provide support at the examination and to consider the SA implications of the MMs.

This Post Adoption Statement (PAS) is the final output of the IIA process. It describes the way in which the Council has taken environmental and sustainability considerations and the views of consultees into account in the adopted Local Plan and fulfils the plan and programme adoption requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

1.2 The Local Plan

The Bexley Growth Strategy was adopted by the Council in December 2017. It sets out how Bexley can deliver sustainable growth in homes, jobs and services to create a network of healthy, well-connected, high quality, desirable places where people want to live, play, learn and work. It identified the areas that have the potential to grow the most and the new infrastructure necessary to make sure these areas will work properly.

The Local Plan supports the delivery of the Bexley Growth Strategy within the context of London's growth requirements. It provides clarity on the location and phasing of development, and the local standards that development should achieve over the plan period (2021-2038). It will enable the Council to plan pro-actively and positively for development by focusing on the community needs and opportunities in relation to places, housing, economy, infrastructure, local services and other issues across the Borough. It also establishes planning policies that seek to safeguard the environment, aid resilience and adaptation to climate change and enhance the natural and historic environment.

The Local Plan is also bound to, and has been tested against, its general conformity and compliance with the London Plan. The London Plan is the Spatial Development Strategy for Greater London and sets out a regional vision and policies that cover housing, transport, employment and the environment.

The Local Plan seeks to meet the Mayor's 10-year (2019-2029) housing target for Bexley of 6,850 (net) new homes and, subject to any review of the London Plan, the Council will seek to provide for at least 6,165 (net) new homes for the remainder of the plan period between 2030 and 2038. The

The Local Plan also makes provision for 3.6 permanent pitches for Gypsies and Travellers and 10,800 (net) new jobs to meet the needs of the Borough in the plan period.

Work on the Local Plan commenced in 2017. The IIA has considered each stage of Local Plan preparation (as summarised in **Table 1.1**). The contextual information and approach to the IIA was set out in a draft Scoping Report, which was consulted on alongside an Issues and Options document. The preferred approaches consultation document included a number of site options and proposed wording for policies. These were assessed in the May 2021 IIA Report as part of the consideration of reasonable alternatives within the appraisal of the Regulation 19 Draft Local Plan.

Table 1.1 Local Plan Stages and IIA Reports

Local Plan stage	Title	IIA Stage	Date
Regulation 18	Preferred Approaches	Scoping Report	February 2019
Regulation 19	Draft Local Plan	Integrated Impact Assessment Bexley Draft Local Plan (Reg 19) and IIA Appendices	May 2021
Regulation 22	Submission Draft Local Plan	Addendum to the May 2021 IIA Report	November 2021
Regulation 22	Examination	Consideration of Site Allocations in the Integrated Impact Assessment and Habitats Regulations Assessment	June 2022
Consultation on Main Modifications	Main Modifications	Addendum to IIA Report – Appraisal of Main Modifications	November 2022

Following the conclusion of the MM consultation (including their IIA) and consideration of the final responses, in February 2023 the Council received the Inspector’s Report which included a small number of further changes to the MMs. The Inspector concluded that, with the recommended MMs, the Local Plan satisfied the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004 and met the criteria for soundness in the National Planning Policy Framework (NPPF). The Local Plan was subsequently adopted by the Council on 26th April 2023.

Further information on the adopted Local Plan is available via the Council’s website.

1.3 The Requirement for Sustainability Appraisal

Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects.

Paragraph 16 of the NPPF sets out that local plans should be prepared with the objective of contributing to the achievement of sustainable development.

Paragraph 32 of the NPPF states that:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements [a footnote identifies the SEA Regulations]. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be

pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."

In undertaking the SA of the Local Plan the Council integrated other forms of assessment. The IIA incorporates SEA, Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). Each of these components are discussed in turn below.

1.3.1. Strategic Environmental Assessment

In undertaking the requirement for SA, local planning authorities must also incorporate the requirements of the SEA Regulations. This is reflected in paragraph 32 of the NPPF. The Planning Practice Guidance (PPG) provides specific direction on undertaking SA of local plans and includes a checklist that details the SEA regulatory requirements and where further information on compliance can be identified. The Government guidance for SEA is also relevant to undertaking an SA of a local plan.

In addition to regulations, planning policy and guidance, any SA will need to reflect the judgements arising from relevant SEA case law. This includes ensuring the equal treatment of reasonable alternatives within the SA, the presentation of reasons for selection and rejection of reasonable alternatives and the need to maintain an audit trail of decisions.

There is a requirement to consult on the scope of the SEA with statutory consultees (Historic England, Natural England and the Environment Agency). The Council prepared a Scoping Report to inform the assessment that accompanied the Regulation 18 Draft Local Plan and consulted on that between February and 31 March 2019. This included the contextual information used to inform the scope of the IIA, along with a draft IIA Framework to be used to complete the assessment.

1.3.2. Health Impact Assessment (HIA)

There is no statutory requirement for HIA. Undertaking HIA helps ensure that health and wellbeing are being properly considered in planning policies and proposals. The process looks at the positive and negative health and wellbeing impacts of development as well as assessing the indirect implications for the wider community. Within the context of the Local Plan, the aim is to assess the main health and wellbeing impacts of policies and proposals in order to identify any opportunities for the emerging planning policies to maximise the benefits and avoid any potential adverse impacts. The NHS London Healthy Urban Development Unit (HUDU) has developed a Rapid Health Impact Assessment Tool (October 2019) which has been completed as part of the IIA for each post Regulation 18 stage of the Local Plan.

1.3.3. Equalities Impact Assessment

An EqIA is not a statutory requirement but is a tool to assist the Council in complying with requirements under the UK Equality Act 2010 and Public Sector Equality Duty, which require public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. EqIA serves as a mechanism for ensuring that 'due regard' is given to minority groups in decision-making and the activities of the Council. This includes policies, procedures, projects and proposals. Legislation identifies nine protected characteristics and the EqIA has considered the potential for effects on these of the Local Plan (with findings documented in an appendix to the relevant IIA Reports).

1.3.4. Habitat Regulations Assessment

Regulation 105 of The Conservation of Habitats and Species Regulations 2017 (the ‘Habitats Regulations’) requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any ‘likely significant effects’ (LSE) on any European site as a result of the plan’s implementation (either alone or ‘in combination’ with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site’s integrity with reference to the site’s conservation objectives.

Strictly, ‘European sites’ are any Special Area of Conservation (SAC); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs); and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Conservation of Habitats and Species Regulations 2017 are applied as a matter of Government policy when considering development proposals that may affect them (NPPF para 181). ‘European site’ is therefore used in its broadest sense, as an umbrella term for all of the above designated sites.

The process by which the effects of a plan or programme on European sites are assessed is known as ‘Habitats Regulations Assessment’ (HRA). ‘Appropriate Assessment’ has been historically used as an umbrella term to describe the process of assessment as a whole. The whole process is now more usually termed ‘Habitats Regulations Assessment’ (HRA), and ‘Appropriate Assessment’ is used to indicate a specific stage within the HRA.

In accordance with the Habitats Regulations, what is commonly referred to as an HRA screening exercise was undertaken to identify the likely impacts of the Local Plan upon European sites, either alone or ‘in combination’ with other projects or plans, and to consider whether these impacts are likely to be significant. Where there are likely significant impacts, more detailed Appropriate Assessment would be required.

The [HRA screening exercise](#) was reported separately from the IIA of the Local Plan but importantly helped inform the appraisal process, particularly in respect of the potential effects of proposals on European protected sites. An addendum to the IIA and HRA was also prepared in light of the MMs and was published in November 2022 as part of the consultation on the MMs.

1.4 Purpose of this Post Adoption Statement

This PAS represents the conclusion of the IIA process and fulfils the plan and programme adoption requirements of the SEA Regulations. In accordance with SEA Regulation 16 (4), this statement sets out the following:

- How environmental and sustainability considerations have been integrated into the Local Plan (Section 2 of this document);
- How the IIA Reports have been taken into account (Section 3);
- How opinions expressed in response to the consultation on the IIA Reports have been taken into account (Section 4);
- The reasons for choosing the Local Plan, as adopted, in the light of the other reasonable alternatives dealt with (Section 5); and
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Local Plan (Section 6).

2. How Environmental and Sustainability Considerations Have Been Integrated into the Local Plan

2.1 Environmental and Sustainability Considerations in the Local Plan

Environmental and wider sustainability considerations have been integral to the key decisions made in respect of the policies and proposals of the Local Plan. The integration of these considerations into the plan making process has principally been achieved through:

- The development of a comprehensive evidence base on topics including (inter alia) housing, employment, retail, transport, green infrastructure, biodiversity, flood risk, communities and viability;
- Sustained engagement with key stakeholders and the public on the emerging Local Plan and related environmental and sustainability matters;
- The consideration of national planning policy and the objectives of other plans and programmes, including the London Plan;
- Fulfilment of the Council's Duty to Cooperate, and
- Ongoing assessment through IIA (incorporating SA, SEA, HIA, EqIA and HRA).

2.2 Local Plan Content

The Local Plan sets out a vision which establishes the priorities for the Local Plan and informs the objectives, policies and spatial strategy which will help guide development and planning decisions up to the year 2038.

To support the vision, the Local Plan includes four spatial objectives (principles of sustainable development), covering social, environmental and economic sustainability and the need to consider these in an integrated way. The Local Plan then highlights how these objectives will be achieved through the creation of high quality environments, safe walkable environments, transport orientated development and high quality, sustainable employment areas.

The Local Plan establishes planning policies for the following topics:

- Bexley's growth (including the proposed spatial strategy);
- Bexley's homes (including how the requirement for new homes will be met);
- Bexley's economy (including the overall strategy for employment growth and change within industrial areas);
- Bexley's character (including policies in relation to heritage, tall buildings and policies to secure high quality design);
- Bexley's wellbeing (including policies relating to community services, facilities and open space);
- Bexley's infrastructure (including policies relating to transport, water and waste); and

- Climate change mitigation and enhancement (including policies relating to flood risk management and energy infrastructure).

The spatial strategy focusses development in:

- Areas within 800 metres walking distance of, and including, Bexley’s Major and District Town Centres and 400 metres from Local Town Centres;
- Areas in the borough within 800 metres of railway stations that have a corresponding town centre nearby and 400 meters where the station has no adjacent town centre;
- Areas with public transport access levels (PTALs) of 3-6;
- Designated industrial locations (specifically for industrial growth and intensification); and
- the Thamesmead and Abbey Wood London Plan Opportunity Area.

Collectively, these policies deliver sustainable growth for the district out to 2038 (and beyond), enabling the Council to plan positively for development, whilst safeguarding the environment, aiding resilience and adaptation to climate change and enhancing the natural and historic environment.

2.3 Environmental and Sustainability Considerations in the IIA

To provide the context for the IIA and in compliance with the SEA Regulations, a review of other relevant plans and programmes was undertaken and the relevant aspects of the current state of the environment and its evolution without the Local Plan were considered; together, they informed the identification of a series of key sustainability issues. This information was initially set out in the 2019 Scoping Report and was subsequently updated as part of the IIA Report (May 2021) and then in subsequent IIA Reports to reflect changes since the Scoping Report was published, including amendments to the NPPF and London Plan.

The key sustainability issues, identified through the review of plans and programmes and analysis of baseline information, informed the IIA objectives and guide questions that comprised the IIA Framework used to appraise the Local Plan. The IIA objectives are shown in **Table 2.1**. Broadly, the IIA objectives presented the preferred sustainability outcome which involved minimising detrimental effects and enhancing positive effects.

Table 2.1 IIA Framework

IIA Objective	Sub-objective
1: Demographic Change (Infrastructure)	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.
2: Social Integration and Inclusion	To improve the quality of where people live, reducing crime and the perceptions of safety, building strong and resilient socially integrated communities, where every person is able to participate, reducing inequality and disadvantage, addressing the diverse needs of the population.
3: Health and Health Inequalities	To improve the mental and physical health and wellbeing of residents and to reduce health inequalities across the borough and between communities.

IIA Objective	Sub-objective
4: Housing Supply, Quality, Choice and Affordability	To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand.
5: Sustainable Land Use	To make the best and most efficient use of land so as to support sustainable patterns and forms of development.
6: Connectivity	To enhance and improve connectivity for all to, from, within and around Bexley and increase the proportion of journeys made by sustainable and active transport modes.
7: Accessibility	To maximise accessibility for all in and around Bexley
8: Economic Competitiveness and Employment	To support the strengthening of a diverse local economy including: a network of vibrant and successful town centres; increased inward investment in new high technology and creative sectors supported by state-of-the-art digital connectivity; and improved accessibility to jobs in London and the wider south east.
9: Education and Skills	To ensure the education and skills provision meets the needs of Bexley's existing and future labour market and improves life chances for all.
10: Culture and the Historic Environment	To conserve and enhance the borough's rich cultural and historic environment.
11: Air Quality and Climate Change mitigation	To reduce emissions and concentrations of harmful atmospheric pollutants particularly in areas of poorest air quality, and reduce emissions of greenhouse gases, and reduce exposure.
12: Climate Change Adaptation	To ensure Bexley adapts and becomes more resilient to the impacts of Climate change and extreme weather events such as, flood drought and heat risks.
13: Water Integration	To protect and enhance Bexley's water environment by ensuring a coordinated and holistic approach to integrated water management (IWM) through land and water management, including managing water storage, supply, wastewater, flood risk, quality of watercourses and water bodies and the wider environment.
14: Natural Environment and Natural Capital	To protect, connect and enhance Bexley's natural capital (including Important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.
15: Townscape, Landscape and Public Realm (Design)	To create attractive, mixed use neighbourhoods ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense of place and distinctiveness, reducing the need to travel by motorized transport.
16: Geology and Soils	To conserve Bexley's geodiversity and protect soils from development and over intensive use.
17: Materials and Waste	To keep materials at their highest value and use for as long as possible, significantly reduce waste generated and achieve high reuse and recycling rates.
18: Noise and Vibration	To minimise noise and vibration levels and disruption to people and communities across Bexley and reduce inequalities in exposure.

The IIA process considered the contribution of the Local Plan towards each of the appraisal objectives, drawing on the baseline information (and its evolution) to predict the likely significant effects of the plan in line with government guidance.

Specifically, the following key components of the Local Plan were appraised against the IIA objectives:

- Local Plan vision and key objectives;
- Spatial Strategy;
- Proposed policies that were included in the various iterations of the Local Plan; and
- Housing allocations and reasonable alternatives.

The appraisal identified the likely changes to the baseline conditions as a result of the Local Plan's implementation. These effects were described (where possible) in terms of their extent, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, short, medium and/or long-term. In accordance with Schedule 2 (6) of the SEA Regulations, consideration was also given to the potential for significant secondary, synergistic and cumulative effects.

This was undertaken for each stage of plan development (see Section 3.1).

3. How the IIA Report Has Been Taken into Account by the Council

3.1 Overview

As set out in Section 1.2, the development of the Local Plan has been iterative. IIA has played an integral role in this iterative process with each of the following Local Plan stages having been accompanied by a IIA Report in order to help inform the Plan and fully integrate environmental and sustainability considerations into decision making:

- Preferred Approaches, February 2019;
- Draft Local Plan, May 2021;
- Submission Draft Local Plan, November 2021;
- Examination (hearing sessions were held between 10 May 2022 and 21 June 2022 and on 4 October 2022); and
- Main Modifications, November 2022.

Table 3.1 presents a summary of the key stages in the development of the Local Plan, the associated IIA work undertaken and the key conclusions of the appraisal.

Table 3.1 Summary of the IIA and Links to the Development of the Local Plan

Local Plan stage and Title	IIA Stage	Key conclusions
Regulation 19 Draft Local Plan	Integrated Impact Assessment Bexley Local Plan – Regulation 19 Draft Local Plan (May 2021)	<p>This report considered the policy wording presented in the Regulation 18 Local Plan together with the policies included in the Regulation 19 Local Plan.</p> <p>The Regulation 19 Local Plan objectives are broad ranging spanning key socio-economic and environmental themes. As a result, compatibilities have been identified with each IIA objective and the potential for a range of significant positive effects identified. None of the Regulation 19 Local Plan objectives have been assessed as being incompatible with the IIA objectives although some uncertainties are identified, which reflect how the objectives could be realised.</p> <p>To inform the development of the Regulation 19 Local Plan, the policies included in the earlier Regulation 18 Local Plan were reviewed against the IIA objectives. A number of recommendations were made following the review, many of which were addressed in the policies in the Regulation 19 Local Plan; this included revisions to the strategic objectives of the Local Plan to broaden them out to reflect concepts like climate change adaptation and mitigation.</p> <p>The performance of the Regulation 19 Local Plan policies was also assessed using IIA objectives. Overall a number of potential significant positive effects (including synergistic and cumulative effects) were identified, in relation to: infrastructure (demographic change) (IIA objective 1); social integration and inclusion (IIA objective 2); health and health inequalities (IIA objective 3); housing supply, quality, choice and affordability (IIA objective 4); connectivity (IIA objective 6); accessibility (IIA objective 7); economic competitiveness and employment (IIA objective 8); air quality and climate change mitigation (IIA objective 11); climate change adaption (IIA objective 12); water integration (IIA objective 13); natural environment and natural capital (IIA objective 14); townscape, landscape and public realm (design) (IIA objective 15); and geology and soils (IIA objective 16).</p> <p>The potential for significant negative effects (including mixed scores and some cumulative effects) was identified for: sustainable land use (IIA objective 5); air quality and climate change mitigation (IIA objective 11); water integration (IIA objective 13); natural environment and natural capital (IIA objective 14); and materials and waste (IIA objective 17). These relate to the use of land, resources, embodied carbon in construction material, the likely emissions associated with the occupation of dwellings/other facilities and services and trips generated by the residents and the subsequent wastes created.</p>

Local Plan stage and Title	IIA Stage	Key conclusions
		<p>The Council identified 58 candidate sites that it considered to be potentially suitable and deliverable that it wished to consider for allocation in the Local Plan. The potential for significant positive effects were identified in relation to a range of IIA objectives, based on the benefits that allocation would bring such as additional housing and other facilities (e.g. IIA objective 4 'Housing Supply, Quality, Choice and Affordability'), proximity to existing services and facilities (e.g. IIA objective 9 'Education and Skills') or because they were located in less environmentally sensitive areas (e.g. in relation to flood risk – IIA objective 13 'Water Integration').</p> <p>The potential for significant negative effects (pre-mitigation) was identified for the following IIA objectives:</p> <ul style="list-style-type: none"> ● Objective 8 'Economic Competitiveness and Employment' because they could result in a net loss of industrial or commercial floorspace in a Strategic Industrial Location (SIL) or town centre (12 sites); ● Objective 13 'Water Integration' due to a site being partially or wholly within flood zone 3a or 3b and/or site is at high risk of surface water flooding or situated above potable groundwater abstraction sites - Source Protection Zone 1 (SPZ 1) (41 sites); and ● Objective 14 'Natural Environmental and Natural Capital' due to the site being located within 500m of a nationally/internationally designated site (23 sites). <p>A similar range of effects was identified in relation to the 23 proposed allocations.</p> <p>The IIA concluded that the Draft Local Plan includes policies which seek to manage these effects and the London Plan provides further policy safeguards, in consequence, it is expected that significant adverse effects will be largely avoided, although some uncertainty remains. The IIA did not identify any additional measures to avoid or reduce such effects.</p>
Regulation 22	Addendum to the IIA Report (November 2021)	<p>The addendum commented on responses to the draft IIA Report, considered the implications of the revised NPPF (July 2021) and reviewed changes to Local Plan policies proposed by the Council in response to consultation comments received at Regulation 19 stage. The addendum concluded that none of the changes affected the results of the IIA, for example Policy DP18 was amended to refer to: <u>waterfront development and development including, or close to, flood defences</u>. References to the policy in the IIA Report were updated in the addendum to reflect the change to the title of the policy, but the changes to the policy did not affect the results of the assessment because the IIA provided a high level assessment of the policy, which was not affected by the change.</p>

Local Plan stage and Title	IIA Stage	Key conclusions
Regulation 23,24 and 25	Consideration of Site Allocations in the Integrated Impact Assessment and Habitats Regulations Assessment (June 2022)	<p>This Technical Note was prepared in response to a question from the Inspectors. In summary, participants at the Examination suggested that their sites (that are proposed to be allocated in the submitted Local Plan) had capacity to deliver significantly more homes than the minimum figure included in the Local Plan. The Inspectors asked the Council if the implications of an uplift in the capacity of the allocated sites should be considered and what effects would it have on the approach taken by the IIA.</p> <p>The Technical Note was informed by discussions with Council officers. Consideration was given to the effects on the findings of the IIA. Provided any increase in individual site allocations were planning policy compliant, scoring against the 17 of the 18 IIA objectives would be neutral as the outcome was based on the ability of sites to deliver new infrastructure, or site proximity to facilities, or other site characteristics or could not be assessed.</p> <p>The Council confirmed that the Local Plan target would remain at 10,630 dwellings (i.e. it would not be increased to reflect the potential additional capacity that the allocations could provide and the contribution from other sources of supply would be managed accordingly to reflect any uplift in capacity from allocated sites and five year land supply considerations). It was therefore concluded that the IIA did not need to consider a higher housing trajectory than that already allowed for in the Local Plan.</p>
Consultation on Main Modifications	Addendum to IIA Report – Appraisal of Main Modifications (November 2022)	<p>This addendum set out the assessment of the likely significant effects associated with proposed MMs to the Bexley Draft Local Plan. The Council needed to be satisfied that the conclusions contained in the IIA would remain robust if the MMs were adopted and needed to ensure that all the likely significant effects of the Draft Local Plan (as proposed to be modified) had been identified, described and evaluated. This document also updated the IIA Report to reflect any relevant changes (e.g., changes to the wording of policies).</p>

3.2 How the Findings of the IIA Have Been Taken into Account

Through the IIA, a number of detailed recommendations were made concerning the emerging plan policies and these were set out in the IIA Reports prepared in support of the Local Plan. These were identified through the assessment of the Local Plan against the IIA objectives, the HIA, EqIA and a review against the NPPF. No additional recommendations were identified following a review of the proposed modifications. The changes made in response to the recommendations are summarised below, reflecting the order of policies in the Adopted Local Plan:

- The layout of the Local Plan was amended to make the distinction between policies and supporting text clearer;
- The vision was moved in front of the policies and amended to include protection of the natural environment through net gains for biodiversity, and the management of air and water quality, flood risk and other effects of climate change;
- The vision and objectives were recast to provide more detail and the linkages between the objectives and vision made clearer;
- A set of Local Plan Spatial Objectives were provided to set out more clearly the principles of sustainable development that the Local Plan would be aiming to achieve;
- Policy SP1 'Achieving sustainable development – the spatial strategy' was amended to include a broader range of considerations, including climate change adaptation and mitigation. The policy was also amended to include additional criteria relating to the location of Gypsy and Traveller accommodation;
- Additional information was provided on the amount of housing that will be planned for over the plan period and the anticipated contribution from small sites;
- Policy DP4 'Gypsy and traveller accommodation' had additional criteria relating to the intensification of an existing site added, this was subsequently amended to include allowance for extension of an existing site;
- Additional text was added into the supporting text for Policy DP12 'Tall buildings and building heights' to explain the heights set out in the policy;
- Policy SP8 'Green infrastructure including designated Green Belt' was amended to refer to the protection of the Green Belt from inappropriate development, rather than simply referring to the NPPF and London Plan and the Policy was also amended to promote the beneficial use of the Green Belt;
- Policy DP30 'Mitigating climate change' included an amendment to provide some flexibility in relation to the use of sustainable design standards, recognising that it may not always be viable for developments to achieve these. The standards were also extended to include the Home Quality Mark and BREEAM Communities; and
- Following a review of a draft set of indicators for the Local Plan additional indicators relating to water quality, air quality and open space were included in the Local Plan.

4. How Opinions Expressed During Consultation Have Been Taken into Account

4.1 Overview

As set out in Section 1.2, the development of the Local Plan has been informed by extensive, ongoing engagement and public consultation, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Council submitted a Statement of Community Involvement (SCI) at the time of submitting the Local Plan which includes consultation arrangements for Plan making. The SCI was republished following removal of amendments for the coronavirus (COVID19) pandemic (December 2022). The Regulation 22 Consultation Statement summarises the consultation process for the Local Plan.

4.2 Local Plan Consultation

4.2.1. Regulation 18: Consultation on Preferred Approaches Document

In the summer of 2017, a public 'call for sites' exercise took place. Residents, landowners and other interested parties were asked to submit details of sites (of 0.25 hectares and greater) that they wanted to be assessed for future development potential or change of land use as part of a new local plan being prepared for the borough.

From 15 February to 7 April 2019 a seven-week public consultation took place on the preferred approaches to matters to be contained within the new Bexley Local Plan (Regulation 18 consultation document). A total of 440 responses were received to both rounds of consultation.

Responses to these submissions are summarised in Appendix 1 of the Consultation Statement.

4.2.2. Regulation 19: Consultation on Draft Local Plan

The Council carefully considered all views received during the Regulation 18 stage public consultation and made appropriate revisions to the document which became the Regulation 19 stage Draft Local Plan.

Between 28 May and 25 July 2021, the Council made the Regulation 19 stage Draft Local Plan Proposed Submission Documents available for public inspection so that individuals, groups or businesses had the opportunity to make representations (under Regulation 20) on the soundness and legal compliance of the plan.

The opinion of the Mayor of London as to the Plan's general conformity with the London Plan was also requested at this stage in accordance with Regulation 21.

A total of 80 responses were received under Regulation 20 during the consultation and the Consultation Statement provides an analysis of these in Section 5.

4.2.3. Regulation 22: Submission Local Plan

The Council carefully considered all representations made under Regulation 20 and, as a result, proposed modifications to the Draft Local Plan and submission Policies Map set out in a Schedule of Changes.

The Schedule of Changes, the Draft Local Plan, and its supporting documents, were submitted to the Secretary of State on 30 November 2021 for independent examination.

4.2.4. Consultation on Main Modifications

Hearing sessions took place between 10 May and 4 October 2022. Following the conclusion of the hearing sessions, the Council requested that the Inspectors recommend any modifications to the Draft Local Plan they considered necessary to ensure it is sound and legally compliant. The text for the Main Modifications was agreed between the Inspectors and the Council and underwent a period of public consultation between 25 November 2022 and 8 January 2023, alongside additional changes to the submission policies map. The Council received 21 representations. The Council's Adoption Statement provides additional information in relation to the representations received and the Inspectors report discusses how the representations were taken into account.

4.2.5. Inspectors Final Report Including Main Modifications

The Local Plan was found sound by the Inspectors in their report dated 28 February 2023 which included minor changes to the MMs as consulted on.

4.2.6. Issues Raised During Consultation on the Local Plan

The Regulation 22 Consultation Statement provides a comprehensive summary of the responses received at each of the consultation stages from 2017 to 2023 and how the Local Plan responded to these.

The issues raised included:

- Whether the borough could accommodate growth in a sustainable way, whilst protecting the environment and Bexley's character.
- Whether the London Plan Opportunity Areas played a sufficient role in delivering growth in the borough.
- Whether the policy SP1 and the identified sustainable development locations were too restrictive in allowing development outside of these areas.
- Whether the housing target was too low to meet identified need and if the 5-year housing land supply had been calculated incorrectly. Subsequent to this if a Green Belt review was required to meet identified housing need.
- Whether the Plan was sufficiently flexible to allow for different provision of unit mix on different sites.
- If the affordable housing targets were viable and achievable.
- Whether the borough could meet future demand for industrial land in the context of land release and the downgrading of some SIL.
- Whether the tall buildings policy was too restrictive or not restrictive enough.
- Whether there was enough protection for the borough's existing social and community infrastructure.

- Whether there was enough funding for the required types of infrastructure especially in the context of small site development.
- Whether the plan offered enough protection for designated open spaces such as Metropolitan Green Belt (MGB), Metropolitan Open Land (MOL) and Urban Open Space (UOS) or if policies were too restrictive.
- Whether the plan would achieve net gains for biodiversity in practice and if there is enough protection for Sites of Importance for Nature Conservation (SINCs).
- Whether the policy approaches supporting targeted road schemes, and the protection of town centre and station car parks were consistent with the Healthy Streets Approach, the Mayor's Vision Zero and support mode shift from the car.
- Whether the parking standards were too high, particularly for family housing and in London Plan Opportunity Areas, and not in general conformity with the London Plan.
- Whether the Plan was committed to playing its part in preventing and adapting to climate change.

4.3 IIA Consultation Summary

Appendix B of the IIA Report (May 2021) includes a summary of responses on the Scoping Report and Appendix A of the IIA addendum (November 2021) accompanying the Submission version of the Local Plan provides a summary of all the responses received on the IIA prior to submission. The commentary below outlines examples of where comments on the IIA resulted in changes to the IIA Report but also provides commentary in relation to the approach to the identification of reasonable alternatives.

4.3.1. Scoping Report

The Scoping Report was subject to consultation between February and 31 March 2019. Seven parties responded, with responses received from the Environment Agency, Historic England, Natural England, NHS London Healthy Urban Development Unity, Port of London Authority and a resident.

Following a review of the comments, changes were made to the baseline information and the plans and programmes. A detailed amendment was also made to the IIA sub-objective relating to health, with a reference to age friendly environments added. The terminology relating to centres was also amended to align with that in the Local Plan. Appendix B of the IIA Report (May 2020) has a summary of the comments received on the Scoping Report and the Council's responses to them.

4.3.2. Integrated Impact Assessment Bexley Local Plan – Regulation 19 Draft Local Plan (May 2021)

Natural England confirmed they had no comments on the IIA and HRA. The Environment Agency welcomed the IIA and HRA and commented that they are based on robust and credible evidence bases. They suggested that greater prominence be given to the NPPF in the summary of the review of plans and programmes and suggested that greater emphasis should be placed on achieving biodiversity net gain off-site. No comments were received on the reports from Historic England.

There were comments on the reports from three other respondents. Lichfields (on behalf of Berkeley Strategic) suggested that the IIA should have considered an option based on the provision of housing over and above the requirement in the London Plan. This is not considered to be a reasonable alternative (Appendix A of the IIA Addendum (November 2021 provided

justification for this conclusion). Highways England noted some of the effects identified in the IIA and the need for additional work to understand impacts on the Strategic Road Network. A resident made a number of comments on the adequacy of the IIA, including comments in relation to biodiversity net gain and climate change adaptation, which are responded to in Appendix A of the IIA Addendum (November 2021).

4.3.3. Addendum to IIA Report – Appraisal of Main Modifications

MMs were published for consultation between 25 November 2022 and 8 January 2023. An Addendum to the IIA Report was published in November 2022. This Addendum screened the MMs for their significance to the IIA. No comments were received on the Addendum document.

4.3.4. Inspectors Final Report Including Main Modifications

The Local Plan was found sound by the Inspectors in their report dated 28 February 2023 which included minor changes to the MMs as consulted on. The Inspectors concluded in their final report that none of the amendments significantly altered the content of the modifications as published for consultation or undermined the participatory processes and sustainability appraisal/habitats regulations assessment that had been undertaken. The amendments are outlined below.

The change to MM005 was to delete some of the text in part 1 of Policy DP1 that had been included in error. The deletion of the text did not affect the results of the assessment.

MM002 was to add the key diagram, with its change to Policy DP1. It had it mistakenly been part of the Additional Modifications. This change did not affect the results of the assessment.

There were detailed changes in relation to the text on some site allocations.

- The first change related to the retention of views at several sites (ERI01, ERI02, ERI03, ERI04 and ERI05 – Erith Western Gateway (MM045), Pier Road West (MM046), Pier Road East (MM047), Erith Riverside (MM048) and Morrisons Erith (MM049)). The Inspectors concluded that it might not be possible to retain views in all instances, in addition to all the other policy requirements being met. Consequently the Inspectors adjusted the wording of MM046, MM047 and MM049, as consulted on, to state that the views should be retained “where possible.”
- The Inspectors also altered the requirement in respect of developer contributions for the above sites to make clear that these will be required “where necessary and proportionate to the nature and scale of the development.”
- The Inspectors concluded that the requirement for allocations ERI02 and ERI03 that their town centre uses elements be located at ground floor level along Pier Road and Bexley Road was also justified in terms of consolidating the existing town centre. However, they clarified the relevant wording of MM046 and MM047, as consulted on, in the interests of the effectiveness of the policies.
- The Inspectors concluded that provision of open space as part of site ERI05 was justified given the deficiency of open space in Erith. Moreover, the site allocation diagram makes clear that the open space shown is indicative only in terms of size and location. However, for effectiveness, they altered MM049, as consulted on, to make clear that the new public open space in this development is necessary to “contribute towards addressing,” as opposed to entirely addressing the deficiency of open space in the area. Additionally they adjusted this modification to identify the minimum number of new homes as being 420, as opposed to the 400 consulted on in error.
- Policy DP32 ‘Flood Risk Management’ sets out the approach to flood risk and requires development in areas at risk of flooding to be subject to a site specific Flood Risk

Assessment. London Plan policy SI 12 Flood Risk Management references the Thames Estuary 2100 Plan. This focuses on a partnership approach to tidal flood risk management. For policy DP32 to be justified and effective MM035 is required to ensure that it is clear that new development in riverside areas helps to reduce flood risk both now and in the future. It also sets out clear requirements for development within or close to Tidal Flood Zones and aligns the wording with policy SP1. The Inspectors also adjusted the wording of this modification, as consulted on, to make clear that the sequential test has been passed, at plan level, in designated industrial areas and in the Thamesmead and Abbey Wood Opportunity Area.

As the Inspector's concluded, these changes did not affect the results of the assessment.

5. The Reasons for Choosing the Local Plan as Adopted in the Light of the Other Reasonable Alternatives Considered

5.1. Overview

SEA Regulation 12(2) requires that “an environmental report shall be prepared in which 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.” Information to be provided includes “an outline of the reasons for selecting the alternatives dealt with.” (SEA Regulations Schedule 2 (8)).

The European Commission Guidance on the SEA Directive discussed possible interpretations of handling ‘reasonable alternatives’ as required by Article 5(1). It states that “*The alternatives chosen should be realistic. Part of the reason for studying alternatives is to find ways of reducing or avoiding the significant adverse effects of the proposed plan or programme.*”

Planning Practice Guidance states:

“The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves...” (Paragraph: 018 Reference ID: 11-018-20140306)

Typically, for a Local Plan, reasonable alternatives will include options regarding the amount of growth, the spatial strategy, individual site allocations as well as the policies to manage and plan positively for growth.

The potential to consider reasonable alternatives is, however, limited by the London Plan with which the Local Plan must be in conformity. The London Plan contains policies on the scale and location of housing and employment to be provided in the borough, including an allowance for housing development on small sites. For example, Policy H1 of the London Plan states that to ensure housing targets are achieved, boroughs should:

- Optimise the potential for housing delivery on all suitable and available brownfield sites through their development plans and planning decisions, especially the following sources of capacity:
 - ▶ Sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary;
 - ▶ Mixed-use redevelopment of car parks and low-density retail parks and supermarkets;
 - ▶ Housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses;
 - ▶ The redevelopment of surplus utilities and public sector owned sites;
 - ▶ Small sites (see Policy H2 Small sites); and
 - ▶ Industrial sites that have been identified through the processes set out in Policies E4, E5 and E6.

In consequence, as the London Plan includes an annual housing target for the borough, spatial direction and policies around employment land provision, the IIA has not considered reasonable alternatives for the scale, broad locations and planning policy associated with housing and employment provision.

The Council did consider reasonable alternatives associated with the allocation of housing sites. In preparing the Regulation 18 Local Plan, the Council undertook an initial appraisal of housing sites from a range of sources, including:

The 'call for sites' exercise (summer 2017 to autumn 2018) where residents, landowners and other interested parties were asked to submit details of sites (over 0.25 hectares) that they wanted to be assessed for future development potential or change of land use;

- The GLA strategic housing land availability assessment (SHLAA) study, carried out in 2017;
- Previous planning briefs;
- Site allocations; and
- Sites identified by the Council as having potential for development.

Following consultation on the Regulation Draft Local Plan, these possible sites were reviewed further, taking into account any additional sites identified through the consultation.

The Council identified 58 candidate sites that it considered to be potentially suitable and deliverable. Each of these candidate sites was appraised against the IIA Framework using the site-specific criteria to identify the effects. The appraisal findings were pre-mitigation.

The Council also undertook technical work to inform the selection of 23 preferred sites and this was reported in the Site Allocations Technical Paper published alongside the Regulation 19 Local Plan.

Collectively, the preferred plan components are referred to as the Preferred Development Option for the Local Plan. The findings of the appraisal of the Preferred Development Option and reasonable alternatives were reported in the IIA Reports at each stage of Local Plan preparation and subject to public consultation.

5.2. The Reasons for Choosing the Local Plan and for Rejecting Alternatives

Table 5.1 of the IIA Report (May 2021) sets out the reasons for choosing to not allocate sites and for allocating others. Allocated sites were selected for a number of reasons, including:

- They were in a sustainable location (as defined in the Local Plan).
- They provided opportunity for a mixed-use development in a location with high Public Transport Accessibility Levels.
- They were allocated sites from the current Local Plan that the Council wished to continue to safeguard.

Reasons for choosing to not allocate sites from the options considered included:

- The potential loss of social and community infrastructure or designated open space that was not surplus to requirement.
- Potential loss of non-designated industrial uses.
- Existing transport or utilities infrastructure that was still required.

6. Monitoring

6.1 Overview

The SEA Regulations (17 (1)) set out that “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.*” The Regulations are clear that it is not necessary to monitor everything. Instead, monitoring should focus on significant effects.

Government guidance states that details for monitoring the significant effects of implementing a local plan must be included in the SA report, the Post Adoption Statement or in the Local Plan itself. The guidance also states that the monitoring results should be reported in the local planning authority’s monitoring report. Monitoring the adopted Local Plan for sustainability effects can help to answer questions such as:

- Were the SA’s predictions of sustainability effects accurate?
- Is the Local Plan contributing to the achievement of desired SA objectives?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

6.2 The Local Plan Monitoring Framework

Annex A of the Local Plan includes a set of proposed indicators by Policy. The indicators were reviewed as part of the IIA process. Review of an early draft of the indicators as part of the IIA recommended that indicators relating to water consumption and water quality were included in the set of indicators, an indicator relating to water quality was included in the Regulation 19 Local Plan.

It was also suggested that specific indicators were developed around air quality neutrality and the extent to which projects achieve this and open space provision, e.g. the extent to which areas of the borough are achieving recommended open space standards. Both were included in the Regulation 19 Local Plan.

The extent to which indicators align with the IIA objectives and therefore provide the basis for monitoring to meet the requirements of the SEA Regulations is set out in **Table 6.1** below. All topics have at least one related indicator.

It will be important that any monitoring regime associated with the IIA is embedded within monitoring associated with the Local Plan and other Council workstreams, so as to avoid duplication of effort.

Table 6.1 Review of Local Plan Indicators Against SEA Topics

Policy	Indicator	SEA Topic
SP1	Advertised departures from Bexley’s development plan	N/A
SP2, DP3	Net additional dwellings, conventional and non-conventional	Population

Policy	Indicator	SEA Topic
SP2, DP1	Affordable units constructed by type	Population
DP1	Percentage of affordable housing from qualifying residential development (10 or more homes)	Population
DP1	Average house prices	Population
SP2, DP1	Number of people on the housing register	Population
SP2	Dwelling size (gross approvals and completions)	Population/material assets
SP2, DP1	Number of individuals and groups on the Self-Build and Custom Housebuilding Register	Population
SP2	Density of dwellings (approvals)	Population/material assets/human health
SP2, DP2	Delivery of housing on small sites	Population/material assets/landscape
SP2, DP4	Number of Gypsy and Traveller sites	Population
DP1, SP7	Number and type of planning obligations secured	Population/material assets
DP5	Securing appropriate standards for HMOs	Population/material assets/human health
DP5, DP6	Net loss of housing from developments, including HMOs of a reasonable standard	Population/material assets/human health
DP7	Employment uses – approvals and completions (net)	Population/material assets/human health
DP7	Employment floorspace pipeline for reporting year	Population/material assets
SP3	Area of land allocated for industrial use taken up for development	Population/material assets
SP3	Managed release of employment land to other uses	Population/material assets
SP4	Major retail approvals fulfilling the sequential 'town centre first' approach	Population/material assets
DP9	Vacancy rate of shops in strategic and major district shopping centres	Population/Material assets
DP10	Vacancy rate of shops in district centres and neighbourhood parades	Population/Material assets
SP4	No net loss of culture venues and facilities	Population/material assets/Cultural heritage
SP4	Percentage of E class uses within Primary Shopping Areas	Population/material assets

Policy	Indicator	SEA Topic
SP6, DP13	Approvals that would result in the loss of listed buildings	Cultural heritage
SP6, DP13	Approvals that would result in the loss of locally listed buildings or would impact on their settings	Cultural heritage
SP6, DP13, DP14	Approvals that would result in the loss of buildings within a conservation area that contribute to the character of the conservation area, particularly locally listed buildings	Cultural heritage
DP12	Approvals for developments with tall buildings	Cultural heritage/Landscape
SP8	New dwellings on previously developed land	Landscape/Soil
SP8	Inappropriate development on Green Belt/MOL	Population/human health/Landscape/Soil
DP17, DP20, SP8	Area of publicly accessible open space lost and gained	Population/human health/Landscape/Soil
DP17, DP20, SP8	Area of designated publicly accessible open space lost	Population/human health/Landscape/Soil
DP17, DP20, SP8	Percentage of approved developments within 400m of Local Open Space (site size 2-20ha)	Population/human health/Landscape/Biodiversity/flora/Fauna
DP17, DP20, SP8	Percentage of approved developments within 280m of small local spaces (site size <2ha)	Population/human health/Landscape/Biodiversity/flora/Fauna
DP28	Percentage or number of main rivers of good or fair chemical and biological quality	Water/ Biodiversity/flora/Fauna
DP29	Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds	Water/Climatic Factors/Biodiversity/flora/Fauna/Material assets
SP8, DP17, DP20	Net change in area of biodiversity importance and/or protected by nature conservation designations	Biodiversity/flora/Fauna
SP10	Improvements to air quality at monitoring stations	Air/human health/Biodiversity/flora/Fauna
SP10	Amount of carbon off-set funding for the reporting year	Climatic factors
DP15	Percentage of approved dwellings within 800m of public transport	Air/climatic factors
DP15	Number of development schemes (commercial and major residential) approved exceeding maximum parking standards	Air/climatic factors/human health

Policy	Indicator	SEA Topic
SP8, DP32	Number of car free developments in the borough	Air/climatic factors/human health
SP7	Approvals for new community floorspace (F.1 and F.2)	Population/human health
DP8	Approvals for any new or upgraded telecommunications and associated equipment	Material assets
DP26	Capacity of new waste management facilities by waste planning authority (tonnes/m ³ /litres)	Material assets
SP11	Amount of municipal waste arising and managed (by type), by waste planning authority (tonnes)	Material assets
DP26	Production of primary land-won aggregates (tonnes)	Material assets

