

Local Development Framework

Brentford Area Action Plan

Sustainability Appraisal / Strategic Environmental Assessment Adoption Statement

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

Sustainability Appraisals are a requirement of the Planning and Compulsory Purchase Act (2004) and Strategic Environmental Assessments are required by European Directive EC/2001/42 (SEA Directive), which was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes ('SEA Regulations')¹. Central government guidance (CLG, November 2005) has merged these processes to allow for a single joint appraisal to be carried out.

The SEA Regulations require local planning authorities to carry out formal strategic environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. The SEA process ensures that opportunities for public involvement are provided and the significant environmental effects arising from policies, plans and programmes are predicted, evaluated, mitigated and monitored, with a view to promoting sustainable development.

Planning Policy Statement 12 requires a Sustainability Appraisal of Local Development Documents, which incorporates the requirements of the Strategic Environmental Assessment Directive but broadens this to include both social and economic considerations. The purpose of Sustainability Appraisal (SA) is to systematically appraise the social, environmental and economic effects of the strategies and policies in a local development document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.

Throughout the remainder of this statement, reference to SA encompasses the requirements of a merged SA / SEA.

The Sustainability Appraisal Adoption Statement

Upon adoption of a local development document, planning authorities are required under the SEA Directive to prepare a statement summarising:

- How sustainability issues have been integrated into the plan (in this case the BAAP);
- How the sustainability appraisal and consultation has been taken into account; and
- The reasons for choosing the document as adopted in light of other reasonable alternatives.
- Information on how monitoring will be carried during the implementation of the DPD.

¹ Statutory Instrument 2004 No. 1633 on The Environmental Assessment of Plans and Programmes (July 2004)

Full details of the SA process are set out in the Final Sustainability Appraisal Report submitted with the BAAP.

How sustainability considerations have been integrated into the BAAP

The BAAP contains objectives and policies which provide a spatial strategy for the continued regeneration of the Brentford area. This includes policies specific to the town centre, Great West Road, Brentford's river and canal network, as well as proposals for development sites. There are also generic policies for the area of plan coverage on sustainable development, urban design, delivering sustainable access and the provision of large-scale arts, cultural, entertainment and leisure facilities. The EDPD was adopted on 27 January 2009.

The scoping stage of the Sustainability Appraisal (Scoping Report) was carried out in part through the temporary employment of a Sustainability Officer with a qualification and experience in environmental science. During the production of the Scoping Report and especially the collecting of baseline data, information was collected from Officers across the Council including the Environmental Strategy team who are responsible for Strategic Environmental Assessments at a corporate level.

Officers within the Planning Policy team completed the Sustainability Appraisal Report for the preferred options and the revisions for this submission version. This approach meant that both reports were produced simultaneously, whilst care was taken to ensure that the SA maintained a degree of independence from the policy formation and was well informed by environmental professionals. The integrated process allowed for the recommendations from the SA process to feed into and inform the BAAP at every stage of its production.

How the SA report and consultation findings have been taken into account

The integrated SA of the EDPD was an iterative process, with the SA process informing policy formulation at every stage. The following sections explain how the SA and consultation have been taken into account, and the reasons for choosing the EDPD as adopted, rather than the alternative options proposed.

The SA consultation process and changes brought about

Consultation throughout the SA process has been undertaken in accordance with Article 6 of the SEA Directive, the SEA Regulations and Hounslow's Statement of Community Involvement.

Three key bodies are required to be consulted – the Environment Agency, English Heritage and Natural England (formerly English Nature and the Countryside Agency). The guidance also states that it is also desirable for other bodies with social and economic responsibilities to be consulted, as the Council considers appropriate.

The following bodies were therefore consulted:

- The three Statutory Bodies: English Heritage, Natural England, Environment Agency;
- Adjoining Local Planning Authorities: London Boroughs of Ealing, Hammersmith and Fulham, Hillingdon and Richmond; Spelthorne Borough Council and Surrey County Council;

- Other West London Local Planning Authorities: London Boroughs of Brent and Harrow; and additional bodies:
- Government Office for London;
- Greater London Authority;
- West London Business;
- Thames Water;
- London Borough of Hounslow – internal circulation to relevant Departments, including Housing, Health, Economic Development, etc.

At each stage of the process, the comments received, and the changes made as a result, were detailed. The following provides a summary of the consultation process at each stage of the SA process

The Sustainability Appraisal has been produced alongside the Brentford Area Action Plan. There have been four main stages of consultation that have informed the Brentford Area Action Plan and this report.

The *London Borough of Hounslow Sustainability Appraisal Scoping Report* (September 2005) provided an assessment of existing plans and proposals and collected baseline data to identify sustainability issues specific to Hounslow. From this the document set out 23 sustainability objectives which have been used to assess the potential significant effects of different policy options. The consultation period on the SA Scoping Report ran from 31 May – 6 July 2005. Responses to the consultation were broadly supportive of the report but some minor amendments were suggested. Comments from the Statutory Bodies in particular help to shape the SA and were fed into the assessment of the EDPD. The comments received mainly led to amendment of the wording of some of the SA objectives and the inclusion of further information on various topics. The amended Scoping Report was agreed by Executive in September.

To accompany the initial consultation on issues and options for the BAAP, the Council made available a background paper and a document entitled *Sustainability Appraisal Assessment of Options* (June 2005). Whilst not formally consulted upon the document helped to inform the community about the possible impacts of the different policy options put before them. Each option was assessed against the 23 sustainability objectives and a narrative provided where the potential impacts of adopting such a policy stance.

At the preferred options consultation stage of the BAAP, the *Brentford Area Action Plan Sustainability Appraisal Report* (January 2006) was also consulted on. Comments were received from the Environment Agency and Natural England alongside Thames Water, a community recycling group, a developer, Thames Landscape Strategy and The Royal Botanic Gardens, Kew.

No comments were received on the submission SA.

In the process of examining the BAAP, the Inspector made 17 binding recommendations. The majority of these recommendations are minor in nature and would not affect the SA of the BAAP; however, one recommendation is re-instate the Albany Riverside proposal site (preferred option M5).

Government guidance² states that “*Where the Inspector suggests significant changes in the binding report, he or she will need to be satisfied that sufficient SA material is available to show what the significant effects are*”. Therefore this recommendation, whilst potentially having impacts on the sustainability objectives in the SA, has been presented by the Inspector only in light of all necessary sustainability information. It is therefore considered that the decision is in line with the sustainability objectives and does not necessitate a revision of the SA.

Key changes brought about by the SA process

The Sustainability Appraisal of the Brentford Area Action Plan has resulted in the consideration of issues not previously incorporated into the plan making process. This has affected the preparation of policies through the identification of effects not previously considered in the plan making process, particularly environmental and social impacts e.g. climate change, which have not been given as much weight in the past.

Through greater recognition of effects arising from the preferred options, and the need for mitigation and monitoring, awareness of the policies impacts on social, economic and environmental issues is enhanced. As a result, there is greater accountability for plan-makers to ensure the policies in the Area Action Plan are sustainable.

The key changes to the Brentford Area Action Plan as a result of the SA are as follows:

- To mitigate the effects of increased noise both temporarily from construction and from the co-location of residential and employment uses in mixed use the plan includes a criterion requiring developers to show that acceptable conditions will be provided for all noise sensitive uses.
- Sites identified as partially or wholly within areas of medium and high flood risk have been subject to the sequential test, and where relevant the exceptions test set out in Planning Policy Statement 25 Development and Flood Risk to justify future development on these sites.
- New development in Brentford is likely to increase the overall uses of resources. Whilst UDP policies already encourage energy and resource efficiency, the Area Action Plan includes an overarching sustainable development policy. Resource efficient design and construction is integral to that policy. Directing development to sustainable locations will also help to reduce energy use by transport.
- A Transport Study for the Brentford Area was undertaken as part of the plan preparation. It identifies a package of sustainable transport recommendations that need to be implemented to limit the effect of the plan on the existing trunk road network. Policy BAAP7 requires all new major developments within the plan area to contribute to the delivery of these recommendations. These include new pedestrian links through sites, a coherent and safe cycle network and enhanced local bus services. Specific references to enhancing sustainable access within

² Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities, ODPM, November 2005

the town centre and along the Great West Road are also included within policies BAAP3 and BAAP4, and in support of the relevant development sites policies.

- The contribution new development will make to the increased emission of greenhouse gases has also been considered. Whilst local and regional policies already encourage energy and resource efficiency to reduce the emission of greenhouse gases, policy BAAP1 specifically requires all major developments in Brentford to minimise carbon dioxide emissions and generate at least 20% of all energy needs from on site renewable energy sources. The requirement for all major residential developments to achieve a sustainability rating of 4 or above as set in the Government's Code for Sustainability homes will also ensure high levels of energy efficiency both during construction and throughout the lifetime of the developments. The other major source of fossil fuel emissions within the plan area is motor vehicles. Policy BAAP7 seeks to promote sustainable movement in Brentford.
- The whole of the London Borough of Hounslow is designated as an Air Quality Management Area for Nitrogen Dioxide, and exceedences above national targets are common along busy roads and particularly the A4/M4. Other local pollutants include fine particles (PM¹⁰) and Sulphur Dioxide. Policy BAAP1 in conjunction with the Borough's Air Quality Supplementary Planning Document (when adopted) requires mitigation for developments that could have a negative impact on local air quality. The overall aim is to achieve an overall reduction in Brentford's air pollution. As motor vehicles are a major source of Nitrogen Dioxide emissions within the plan area, the promotion of sustainable movement within Brentford through policy BAAP7 will have some effect on reducing the volume of local traffic.
- New development is likely to increase the overall volume of waste produced within the plan area. Policies within the Unitary Development Plan encourage initiatives to minimise waste in all new developments, and is an integral part of good design. The Code for Sustainable Homes rating also considers the waste generated by residential developments both during construction and throughout their lifetime.

The reasons for choosing the BAAP as adopted in light of the other reasonable options addressed

The reasons for choosing the objectives and policies in the BAAP as adopted are set out in detail in sections 5 and 6 of the submission SA. In summary, the SA process of identifying the social, economic, and environmental effects of the different policy options, developing policies from this assessment, and comparing the effects with those of reasonable alternatives, has enabled a thorough analysis of the sustainability effects of the adopted plan and allowed for the incorporation of measures to address any significant negative effects identified.

Measures to be taken for monitoring the significant sustainability effects of the BAAP

The Brentford Area Action Plan includes indicators for monitoring the implementation of policies, which will enable an assessment of whether the policies are being delivered successfully.

The significant effects of the BAAP against sustainability indicators also needs to be monitored to ensure the objectives and policies in the plan are not to the detriment of social, economic and environmental objectives. This section proposes indicators to monitor the impacts of the BAAP on sustainability, both positive and negative.

Whilst the SA report published for consultation at the preferred options stage contained draft indicators for each preferred option, a review of these indicators has since been undertaken. The review of monitoring has considered:

- Whether the proposed 'significant effects' indicators are the most appropriate for measuring the impacts of the BAAP on sustainability
- The availability of information and reliable data to monitor the impacts of the AAP
- Whether the effects monitored can be attributed to individual policies and whether there is a need to look wider at the plan's impacts
- The detail of existing indicators in the submission version of the BAAP and whether they are too specific
- Whether an indicator proposed in the SA is monitoring the implementation of the policy rather than the significant effects of the policy
- The resources available for monitoring

The proposed indicators for monitoring the effects of the plan against sustainability objectives are presented in Table 19 of the submission SA. Performance against these indicators will be reported in the Council's Annual Monitoring Report.

Further information

The Brentford Area Action Plan Sustainability Appraisal Report (July 2007), the BAAP itself, and other relevant documents can be downloaded from the council's website: www.hounslow.gov.uk. Alternatively, to receive a hard copy, please contact: Planning Policy, London Borough of Hounslow, 020 8583 5202, ldf@hounslow.gov.uk.