



**Local Development Framework
Employment Development Plan Document**

**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 (ODPM, 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 Regulations to prepare a statement summarising:

- How sustainability issues have been integrated into the plan (in this case the EDPD);
- 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.

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 EDPD.

How sustainability considerations have been integrated into the EDPD

The purpose of the EDPD is to plan for the future use of land for employment, including industrial and commercial uses, within the Borough. The EDPD was adopted on 25 November 2008.

The early stages of the SA process were carried out in part through the employment of an officer with a qualification and experience in environmental science. During the production of the Scoping Report and especially the collecting of baseline data, support was also given by many officers within a variety of departments within the Council including the Environmental Strategy team who are responsible for SEA at a corporate level. In the latter stages, the EDPD and the SA were prepared by officers within the Hounslow Planning Policy team.

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 EDPD in 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

Employment related issues

Consultation on employment related issues was carried out in August 2004. The Council identified 10 potential 'key issues' in the form of questions that the employment options may need to address. The consultation sought to ensure that the community agreed with the issues identified or to identify issues that were missing. Sixty-four questionnaires were received. More than fifty percent of respondents considered that all but one of the issues identified had a high priority. The one issue that more than fifty percent of respondents gave a lower priority to related to hotel provision in the Borough. However, to ensure consistency with wider aims at a regional and sub-regional level, an objective to promote tourism was considered appropriate.

SA Scoping

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.

Preferred Options

Again, the Statutory Bodies in particular provided comments to inform the SA and Plan preparation, although comments were also received from the Highways Agency and a Planning Consultancy. Comments led to the inclusion of updated/additional research references and a new appendix containing a schedule of open spaces.

Submission

Appendix 4 of the Submission SA comprises a table detailing how objectives and policies in the EDPD have developed from preferred options to the submission version. The objectives and policies in the EDPD are a refinement of the Preferred Options, including more detailed policy wording or refined criteria. For these reasons, the SA was not substantially revised following the publication of the *Employment Development Plan Sustainability Appraisal report* (January 2006) with the exception of appraising the Vision, which did not form part of the Preferred Options consultation document. No comments were received on the submission SA.

Examination

As mentioned above, no comments were received on the SA post-submission. However, in the process of examining the EDPD, the Inspector made 19 binding recommendations. The majority of these recommendations are minor in nature and would not affect the SA of the EDPD; however, one recommendation is to remove part of the Preferred Industrial Location designation from the area around Commerce Road, Brentford.

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 iterative SA of the EDPD, based on stakeholder input and professional judgement of potential sustainability impacts, has helped to inform the objectives and policies of the EDPD throughout the plan preparation process. The key changes brought about by the SA process are as follows:

- The SA has identified and increased consideration of effects not previously considered key 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 EDPD policies, awareness of impacts on implementation has been enhanced. As a result, there is greater accountability for plan-makers to ensure the EDPD is sustainable, and that this is carried through into implementation and mitigation through the planning process, and through other programmes and strategies.
- The potential negative effects of industrial and other employment uses have been identified. The main impacts are potentially noise, use of resources, air quality and emissions, and waste. The policies in the EDPD have been formulated to ensure these effects are minimised, through directing certain uses to the most sustainable locations, and incorporating key development control criteria that development must meet.
- In identification of Key Office Locations at Bedfont Lakes and on the Great West Road, the SA process has enabled consideration of the effects on sustainability objectives. Realising the potential negative effects of offices in these locations, and the significance of these effects (and as it has been recognised that these sites will not be made more accessible in the plan period), the approach to further development has been made more stringent relative to existing UDP policy.
- The option of protecting offices at Bedfont Lakes and on the Great West Road has been carried forward into the adopted EDPD through careful consideration of the effects and what social and economic benefits the companies in these locations provide relative to their environmental impacts.
- The SA has brought about greater recognition of the need to strike an appropriate balance between demand and the supply of land. The most sustainable sites have been identified for protection to ensure there is a

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

reservoir of industrial capacity to meet demand, with the majority of release occurring on other sites subject to criteria.

- The SA has facilitated consideration of factors wider than demand and supply in developing criteria for the protection of sites.

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

The unique attributes of the Borough, and issues identified from the SA and consultation processes and from the evidence base, formed the basis of the EDPD preparation. The SA and consultation processes then played a key role in shaping the objectives and policies within the final EDPD throughout its preparation, as detailed above and in SA reports and consultation statements³ previously published. The EDPD was also prepared to take into account its necessary conformity with national and regional policy.

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

The EDPD was adopted on 25 November 2008. This SA Statement is now made available to those previously consulted and the public, to ensure they are informed of the outcomes and process.

However, the SA / SEA process is iterative, so its success and effectiveness will be monitored by the continued collection of baseline data according to identified indicators. The EDPD 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 DPD against sustainability indicators will also be monitored to ensure the objectives and policies in the plan are not to the detriment of social, economic and environmental objectives.

The following points have been considered in the identification of indicators for monitoring:

- whether the proposed 'significant effects' indicators are the most appropriate for measuring the impacts of the EDPD on sustainability
- the availability of information and reliable data to monitor the impacts of the EDPD
- whether the effects monitored can be attributed to individual policies and whether there is a need to look at the wider impacts of the EDPD
- whether a proposed indicator would monitor the implementation of the policy or the significant effects of the policy
- the resources available for monitoring

Examples of proposed indicators for monitoring the effects of the plan against sustainability objectives include:

- Method of travel to work;
- Number of planning permissions for B class uses granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality;

³ Employment Development Plan Document: Pre-submission consultation statement, July 2007 (plus Supplementary Note)

- Amount of land developed for B class uses on areas designated for nature conservation;
- Completed B class development on brownfield sites.

The performance against these indicators will be reported within the Annual Monitoring Report, which may be downloaded from the Council's website.

Further information

The Submission Employment Development Plan Document Sustainability Appraisal Report (July 2007), the EDPD 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.