

# **Sustainability Appraisal (SA) of the Redbridge Local Plan**

**SA Report**

**Non-technical summary**

**July 2016**

## DOCUMENT DETAILS

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1	July 2016	Non-technical Summary of the SA Report published alongside the 'Proposed Submission' version of the Redbridge Local Plan.	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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# Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Redbridge Local Plan. Once adopted, the plan will establish a spatial strategy for growth and change over the next 15 years, allocate sites and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA for Local Plans is a legal requirement, in-line with the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, the ‘Proposed Submission’ version of the Local Plan is published in-line with Regulation 19 of the Local Planning Regulations, and the ‘SA Report’ is published alongside. The SA Report aims to inform representations, and subsequent plan-making work (see the discussion of ‘next steps’, below).

This is a Non-technical Summary (NTS) of the SA Report.

## Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
  - i.e. in the run-up to preparing the draft plan.
2. What are the appraisal findings at this current stage?
  - i.e. in relation to the Draft Plan.
3. What are the next steps?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question ‘What’s the scope of the SA?’

## What’s the scope of the SA?

The scope of the SA is essentially reflected in a list of sustainability objectives. Taken together, these objectives (and associated criteria) indicate the parameters of SA, and provide a methodological ‘framework’ for appraisal.

*Table 1: Sustainability objectives and criteria (the SA framework)*

Objective	Decision-aiding criteria
	<i>Will the policy option...</i>
1. Reduce <b>poverty</b> and social exclusion	<ul style="list-style-type: none"> <li>• Promote employment in the most deprived areas and stimulate regeneration?</li> <li>• Reduce unemployment?</li> <li>• Promote social cohesion and encourage engagement in community activities?</li> <li>• Connect disadvantaged people with education skills and training?</li> <li>• Promote community spirit?</li> <li>• Promote a culture of equality and fairness for all people?</li> <li>• Promote equality for Black and ethnic minority groups, for women, disabled people, the elderly and people of different faiths?</li> </ul>
2. Reduce and prevent <b>crime</b> and the fear of crime	<ul style="list-style-type: none"> <li>• Reduce actual levels of crime?</li> <li>• Reduce anti-social behaviour?</li> <li>• Reduce the risk of terrorist attack?</li> <li>• Make people feel safe on the streets at night?</li> <li>• Make people feel that public transport is safe to use?</li> </ul>

Objective	Decision-aiding criteria <i>Will the policy option...</i>
3. Meet local <b>housing</b> needs by ensuring that everyone has the opportunity to live in a decent, affordable home	<ul style="list-style-type: none"> <li>• Reduce homelessness?</li> <li>• Reduce the number of unfit homes and overcrowding?</li> <li>• Increase the range of housing choice, taking account of people’s preferences for size, location, type and tenure?</li> <li>• Improve the quality of housing?</li> <li>• Make homes more affordable?</li> <li>• Provide housing that encourages a sense of community and a sense of place?</li> </ul>
4. Improve the <b>education</b> and skill of the population overall	<ul style="list-style-type: none"> <li>• Increase levels of participation and attainment in education?</li> <li>• Improve overall achievement for primary and secondary school children?</li> <li>• Increase the number of people with tertiary/higher education attainment?</li> <li>• Improve on-the-job education and training?</li> <li>• Promote lifelong learning activities?</li> <li>• Contribute to meeting skills shortages?</li> </ul>
5. Provide accessible community <b>services</b> and leisure opportunities	<ul style="list-style-type: none"> <li>• Help people send their children to a school of their choice?</li> <li>• Help people locate and access post offices, other services and health facilities?</li> <li>• Allow people do their day to day shopping without the need for long trips?</li> <li>• Increase provision of theatres, library services, cinemas etc?</li> <li>• Assist access for the elderly, the disabled and those without a car?</li> </ul>
6. Promote <b>healthy lifestyles</b>	<ul style="list-style-type: none"> <li>• Encourage people to eat a more balanced diet and help tackle obesity?</li> <li>• Provide new sporting/recreational facilities or result in more people exercising?</li> <li>• Improve understanding of physical and mental health issues?</li> <li>• Reduce the levels of pollution people are exposed to?</li> <li>• Help find a doctor and gain medical attention quickly?</li> <li>• Lead to fewer people smoking, lower levels of binge drinking, or combat other types of substance abuse?</li> </ul>
7. Maintain, enhance and where appropriate conserve the quality of <b>landscapes</b> and townscapes	<ul style="list-style-type: none"> <li>• Help make people feel positive about the area they live in?</li> <li>• Preserve open space by building on previously developed land?</li> <li>• Respect and improve visual amenity?</li> <li>• Promote high quality design?</li> <li>• Protect listed buildings?</li> <li>• Encourage good use of landscaping?</li> </ul>
8. Maintain and enhance <b>biodiversity</b> , species and habitats	<ul style="list-style-type: none"> <li>• Improve the quality or extent of nature conservation sites?</li> <li>• Adversely impact on sites protected by the EU Habitats Directive?</li> <li>• Enhance the ecological function of the greenspace network?</li> <li>• Protect the water quality of the Borough’s rivers, lakes and other water bodies?</li> <li>• Protect trees and other natural vegetation?</li> <li>• Create new habitat through landscaping, re-vegetation or ‘green’ construction?</li> <li>• Educate and bring people closer to the natural environment?</li> <li>• Protect Biodiversity Action Plan species?</li> </ul>
9. Reduce the effect of <b>traffic</b> on the environment	<ul style="list-style-type: none"> <li>• Reduce the overall need for people to travel?</li> <li>• Reduce traffic volumes and traffic congestion?</li> <li>• Reduce pollution?</li> <li>• Help people get around by walking or cycling?</li> <li>• Improve public transport provision?</li> <li>• Provide better connections between different types of transport?</li> <li>• Reduce the number of road traffic accidents?</li> </ul>

Objective	Decision-aiding criteria <i>Will the policy option...</i>
10. Reduce contributions to <b>climate change</b> and reduce climate change vulnerability	<ul style="list-style-type: none"> <li>• Minimise emissions of greenhouse gases?</li> <li>• Minimise the risk of flooding from rivers and watercourses?</li> <li>• Mitigate the effects of climate change?</li> <li>• Encourage use of renewable and low carbon energy?</li> <li>• Improve energy efficiency and insulation of homes?</li> </ul>
11. Minimise the production of <b>waste</b> and encourage recycling	<ul style="list-style-type: none"> <li>• Reduce the amount of waste being produced?</li> <li>• Promote reuse and recycling?</li> <li>• Help promote a market for recycled products?</li> <li>• Make waste easier to collect and transport?</li> <li>• Allow waste to be used for heating or power generation?</li> </ul>
12. Encourage sustained <b>economic growth</b>	<ul style="list-style-type: none"> <li>• Lead to new businesses being created and diversify the economy?</li> <li>• Give Redbridge a competitive advantage in the region?</li> <li>• Promote investment in leading edge technologies?</li> <li>• Expand the employment base in the Borough?</li> <li>• Encourage innovation and flexibility in work and management practices?</li> <li>• Minimise the burden of regulatory costs?</li> </ul>
13. Improve <b>incomes</b> and living standards	<ul style="list-style-type: none"> <li>• Put more people in jobs?</li> <li>• Help people pay of mortgages and save for the future?</li> <li>• Allow more people to earn money independently?</li> </ul>
14. Enhance the image of the area as a <b>business</b> location	<ul style="list-style-type: none"> <li>• Create commercial areas with a sense of identity and vibrancy?</li> <li>• Reduce the number of vacant and derelict buildings?</li> <li>• Make commercial areas more attractive and accessible?</li> <li>• Help Redbridge town centres maintain / strengthen their position in E. London?</li> <li>• Help Redbridge promote and sell itself more widely?</li> <li>• Capitalise on Crossrail-related opportunities?</li> </ul>
15. Provide a high quality, reliable <b>transport</b> network to support the development of the Borough	<ul style="list-style-type: none"> <li>• Help people commute to places of employment more easily?</li> <li>• Improve access to retail and commercial services?</li> <li>• Reduce delays and make public transport more reliable?</li> <li>• Let people move easily/safely between transport nodes and commercial areas?</li> <li>• Help traffic move more freely?</li> <li>• Help people find town centre parking when they need it?</li> <li>• Improve linkages with the region, including capitalising on Crossrail?</li> <li>• Assist delivery and service vehicle access?</li> </ul>

## PLAN-MAKING / SA UP TO THIS POINT

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.

As such, Part 1 of the SA Report explains how work was undertaken to develop and appraise alternative approaches to housing growth (‘alternative spatial strategies’). Specifically, Part 1 of the report -

- 1) Explains the process of establishing reasonable alternatives;
- 2) Presents the appraisal of the reasonable alternatives; and
- 3) Gives the Council’s response to the alternatives appraisal findings.

## Developing reasonable alternatives

Alternative spatial strategies were developed and appraised in 2014, at the time of the Preferred Options Report Extension (PORE) consultation; however, in 2016 it was recognised that there was a need to revisit and refine understanding of ‘the reasonable alternatives’ in light of:

- 1) Evolving evidence of housing needs and the supply of available land
- 2) Findings of the 2014 Preferred Options Extension consultation
- 3) Findings of the 2016 Green Belt Review.

In relation to **(1)**, a study completed in 2016 established that Objectively Assessed housing Need (OAN) equates to 2,132 dwellings per annum (dpa). This is almost double the target set by the London Plan (2015), which 1,123 dpa. Also, another factor is that the current London Plan target represents a significant increase on that set by the previous plan. As such, by 2016 it was recognised that there was a need to find more land for housing (or accept increased housing densities) than had previously been thought necessary (i.e. at the time of the POSE consultation, and the preceding POS consultation), and that ‘closing the gap’ between the London Plan target and OAN (a step that the borough is obliged to attempt) would necessitate finding significantly more land still.

In relation to **(2)**, there is a need to take into account appraisal findings and consultation responses received on the four spatial strategy alternatives that were a focus of the consultation, namely: A) Proceed with the proposals as per the PORE, including Oakfield; B) Proceed with the proposals as per the PORE, except with higher density redevelopment of King George & Goodmayes Hospitals & Fords Sports Ground to enable no Oakfield; C) Proceed with the proposals as per the PORE, except with higher density redevelopment within the Western Corridor (Woodford to Wansted) to enable no Oakfield; D) Proceed with the proposals as per the PORE, except with additional Green Belt development (sites unspecified) to enable no Oakfield. A number of ‘learning points’ emerged, but perhaps most notably, consultation served to clarify the degree of opposition to development of Oakfield (Option 1) from organisations currently using the site and from local residents. Representations mainly objected to development on the grounds that Oakfield provides a valuable regional facility for sporting clubs and recreational open space for local residents.

In relation to **(3)**, there is a need to recognise that, whilst the 2016 Review is generally consistent with earlier Reviews, it did lead to a different finding in respect of one site - Land to the south of Billet Road (parcel 14c) - finding that it should be released (whereas earlier reviews concluded that it should be retained). As such, there is a strong argument for exploring the merits of this site further, through alternatives appraisal.

In light of (1), (2) and (3) the Council was in a position to develop an up-to-date, refined set of alternative spatial strategies. Essentially, it was recognised that there was a need to develop alternatives that would enable the following questions to be examined:

- **Growth quantum** - Should the borough plan for the London Plan target, or seek to ‘close the gap’ between the London Plan target and OAN (and if so, by how much)?
- **Oakfield** - should it be allocated for c.600 homes, or not?
- **King George & Goodmayes Hospitals & Fords Sports Ground** - should it be redeveloped at a relatively low density, or a higher density?
- **Western Corridor** (Woodford to Wanstead) - should the opportunity sites be redeveloped at a relatively low density, or a higher density?
- **Billet Road** - should it be allocated and if so at what density?
- **Other Green Belt sites** - should the Local Plan reflect the Green Belt Review findings, or is there a need to relax some criteria within the Green Belt Review / identify additional ‘least worst’ sites for housing development?

These considerations led to establishment of the reasonable alternatives presented below (across two tables; **Table 2** presenting the alternatives in summary and **Table 3** presenting the alternatives in detail).

Table 2: Reasonable spatial strategy alternatives 2016 (summary)

Option	Quantum	Distribution <i>As per the preferred option, but with...</i>
1	Minimum growth (16,750 homes)	No Oakfield or Billet Rd
2	Lower growth 1 (17,350 homes)	No Billet Rd
3	Lower growth 2 (17,850 homes)	No Oakfield
4	Preferred Option (18,450 homes)	-
5	Variation on PO 1 (18,450 homes)	No Oakfield; Higher density at Goodmayes
6	Variation on PO 2 (18,450 homes)	No Oakfield; Higher density in Western Corridor
7	Variation on PO 3 (18,450 homes)	No Oakfield; Higher density at Goodmayes and Billet Rd
8	Variation on PO 4 (18,450 homes)	No Oakfield; Extra GB
9	Higher growth 1 (19,050 homes)	Higher density at Goodmayes
10	Higher growth 2 (19,050 homes)	Higher density in Western Corridor
11	Higher growth 3 (19,050 homes)	Extra GB
12	High growth (19,650 homes)	Extra GB

Table 3: Reasonable spatial strategy alternatives 2016 (detail)

Spatial strategy option	Oakfield	King George & Goodmayes Hospitals & Ford Sports Ground*	Western Corridor	Billet Road	Green Belt site(s) that are not supported by GB Review**	Elsewhere	Total
1 Minimum growth (no Oakfield or Billet Rd)	0	1350	650	0	0	14,750	16,750
2 Lower growth 1 (No Billet Rd)	600	1350	650	0	0		17,350
3 Lower growth 2 (No Oakfield)	0	1350	650	1100	0		17,850
4 Preferred Option (PO)	600	1350	650	1100	0		18,450
5 Variation on PO 1 (No Oakfield; Higher density at Goodmayes)	0	1950	650	1100	0		18,450
6 Variation on PO 2 (No Oakfield; Higher density in Western Corridor)	0	1350	1250	1100	0		18,450
7 Variation on PO 3 (No Oakfield; Higher density at Goodmayes and Billet Rd)	0	1550	1250	1500	0		18,450
8 Variation on PO 4 (No Oakfield; Extra GB)	0	1350	650	1100	600		18,450
9 Higher growth 1 (Higher density at Goodmayes)	600	1950	650	1100	0		19,050
10 Higher growth 2 (Higher density in Western Corridor)	600	1350	1250	1100	0		19,050
11 Higher growth 3 (Extra GB)	600	1350	650	1100	600		19,050
12 High growth (Extra GB)	600	1350	650	1100	1200		19,650

\* 'Goodmayes' is used as shorthand for King George & Goodmayes Hospitals & the Ford Sports Ground

\*\* Undefined Green Belt site(s), assumed to be in the east of the Borough (Fairlop Plain)

**Summary alternatives appraisal findings**

Summary appraisal findings are presented within Table 4. Within each row (i.e. for each of the objectives that comprise the SA framework) the columns to the right hand side seek to rank the alternatives in order of performance. Also, ‘=’ is used to denote instances where the alternatives perform broadly on a par.

Table 4: Spatial strategy alternatives appraisal findings

Topic <sup>1</sup>	Rank of performance / categorisation of effects											
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
	Minimum growth No Oakfield or Billet Rd)	Lower growth 1 (no Billet Rd)	Lower growth 2 (no Oakfield)	Preferred Option	Variation on PO 1 (No Oakfield; Higher density at Goodmayes)	Variation on PO 2 (No Oakfield; Higher density in Western Corridor)	Variation on PO 1 (No Oakfield; Higher density at Goodmayes and Billet Rd)	Variation on PO 1 (No Oakfield; Extra Green Belt)	Higher growth 1 (higher density at Goodmayes)	Higher growth 2 (higher density in Western Corridor)	Higher growth 3 (extra GB)	High growth (extra GB)
Poverty	=	=	=	=	=	=	=	=	=	=	=	=
Crime	=	=	=	=	=	=	=	=	=	=	=	=
Housing	12	11	10	5	8	8	7	5	3	3	2	★1
Education	6	★1	6	★1	6	6	6	6	★1	★1	★1	★1
Services	★1	★1	★1	★1	11	11	10	★1	★1	★1	★1	★1
Health	★1	★1	★1	★1	11	11	10	★1	★1	★1	★1	★1
Land/town- scape	★1	★1	3	3	5	5	5	5	5	5	5	12
B'diversity	★1	★1	★1	★1	10	★1	9	★1	10	★1	★1	10
Traffic / transport	4	★1	4	★1	4	4	4	4	4	★1	4	4
Climate change	4	4	4	4	★1	4	★1	4	★1	4	4	4
Economy	=	=	=	=	=	=	=	=	=	=	=	=

<sup>1</sup> N.B. These topics are derived from the 15 objectives that comprise the SA framework.

Table 4 (Cont'd): Spatial strategy alternatives appraisal findings

**In conclusion**, it is apparent that some options perform better than others, but that there is no obviously best performing / 'most sustainable' option.

Key considerations are as follows:

- **Poverty** - The alternatives perform on a par. Whilst certain options are better suited to the delivery of community infrastructure (see discussion below), it is not clear that there will be implications for poverty and social exclusion (recognising that the alternatives do not vary in terms of approach to growth in the south of the borough; where major benefits are set to be realised, most notably at Ilford). King George & Goodmayes Hospitals & the Ford Sports Ground is notable for being well linked to the Crossrail corridor, but it is not clear that this will translate into 'poverty and social exclusion' benefits.
- **Crime** - The alternatives perform on a par. Whilst certain options are better suited to the delivery of a high quality and legible urban realm (see discussion below, under 'townscape'), it is not clear that there will be implications for crime.
- **Housing** - In general, there is a need to deliver higher growth in order to more fully 'close the gap' between land supply and objectively assessed housing needs; also, there is a need to deliver an appropriate housing mix, in terms of type (family housing is needed) and tenure (affordable housing is needed). Options involving higher growth at 'King George & Goodmayes Hospitals & the Ford Sports Ground' or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given implications for the desired housing mix.
- **Education, services and health** - Oakfield is a growth location that performs well given its location (good access to Barkingside, public transport, leisure facilities and open space) and given potential to deliver a new school and health facility; albeit there remain some uncertainties in respect of re-providing for lost sports pitches (with no net loss in the quality of provision locally). Options involving higher growth at 'King George & Goodmayes Hospitals & the Ford Sports Ground' or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given issues around delivering community infrastructure.
- **Landscape/townscape** - There are clear sensitivities locally, and so lower growth performs well. Billet Road is assumed to be sensitive from a landscape perspective, given that past Green Belt Reviews have found the area to contribute to Green Belt purposes; the borough's Western Corridor is highly sensitive from a heritage perspective; higher density growth at 'King George & Goodmayes Hospitals & the Ford Sports Ground' would compromise design / urban realm objectives; and additional Green Belt development would clearly impact significantly on the Fairlop Plain's characteristic openness.
- **Biodiversity** - Higher density development at 'King George & Goodmayes Hospitals & the Ford Sports Ground' could place pressure on Seven Kings Water, which is an important ecological corridor (given potential for deculverting and restoration). Also, whilst much of the Fairlop Plain area comprises arable farmland likely to be of limited biodiversity value, it is noted that a significant area is farmed under an agri-environment agreement, plus there is a need to consider the possibility of growth in proximity to Hainault Forest SSSI impacting on the site's condition (which is 'unfavourable recovering').
- **Transport and traffic** - Whilst it is difficult to draw strong conclusions in the absence of detailed assessment, it is apparent that certain locations - notably Billet Road and Fairlop Plain, and to a lesser extent 'King George & Goodmayes Hospitals & the Ford Sports Ground' - are less well linked to existing centres and public transport.
- **Climate change** - There are a number of opportunities to deliver district heating infrastructure, and thereby minimise per capita greenhouse gas emissions from the built environment. One area where there is an identified opportunity is 'King George & Goodmayes Hospitals & the Ford Sports Ground', and hence it is assumed that options involving higher density at this site (Options 5 and 8) perform relatively well (as higher density development supports district heating viability).

## The Council's response / justification for the preferred approach

The following text is the Council's response to the alternatives appraisal / reasons for supporting the preferred approach (Option 4) -

"The Council's preferred spatial approach to growth and change aims to respond to the key planning challenges since the adoption of the Core Strategy and Borough Wide Primary Policies (2008), representations received through consultations, and a suite of technical evidence base. There is a need to develop a positive strategy to enable the delivery of successful places and a thriving economy, taking into account other Council plans and strategies that influence the borough; and ultimately provide a robust planning framework against which the aspirations of the Council can be successfully delivered.

The preferred spatial approach is to direct growth to the borough's Investment and Growth Areas and town centres. These areas are highly accessible locations, well connected to the borough's public transport network. They offer a range of investment opportunities with substantial capacity to accommodate new homes, jobs and infrastructure. It is considered that the preferred approach is the most sustainable and will achieve the London Plan housing target of 1,123 homes and help close the gap between it and the objectively assessed housing need. The Council's decision to proceed with Oakfield as an opportunity site and the other sites of Goodmayes and King George Hospital and the Ford Sports Ground and land at Billet Road will significantly contribute towards the Council meeting its housing need.

The SA process has informed the Local Plan and in general supports the preferred strategy. Whilst the alternatives appraisal process has highlighted that there are draw-backs to the preferred approach, it has enabled the Council to reach a conclusion that it is, on-balance, the most sustainable option. In particular, the Council is of a view that:

- A lower growth option involving nil growth at Oakfield would compromise the achievement of important housing delivery objectives without leading to a plan that performs notably better in terms of other strategic objectives (recognising the merits of this site, and the potential to address issues at the site through policy and committed plan implementation).
- A higher growth approach would help to meet objectively assessed housing needs more fully, but would compromise achievement of other important objectives (e.g. higher density development would lead to challenges from a community infrastructure delivery perspective)."

## APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the SA Report answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the Draft Plan. Appraisal findings are presented under fifteen ‘sustainability objective’ headings (see Table 1, above), with the following overall conclusion reached -

The appraisal of the draft (Proposed Submission) plan, as presented above, does not highlight the likelihood of significant negative effects in terms of any objective, and suggests the likelihood of significant positive effects predicted in terms of ‘the economy’ - a matter at the heart of the plan, as reflected in the clear focus on five Investment and Growth Areas. A focus on supporting growth within certain areas and corridors could also lead to significant positive effects in terms of transport and community objectives; however, there is more uncertainty. With regards to ‘housing’, the plan performs well in that the aim is to meet the London Plan target, and also deliver a housing mix that responds to needs; however, the evidence provided by the Strategic Housing Market Assessment (SHMA) suggests that some housing needs will remain unmet.

Relatively few strategic tensions / trade-offs are highlighted through the draft plan appraisal, recognising that the preferred approach is something of a balancing act, arrived at subsequent to appraisal of more extreme options (e.g. higher growth options that would perform well in terms of socio economic objectives, but perform poorly in terms of environmental objectives; and vice versa lower growth options - see discussion of alternatives in Part 1 of this report). There will, of course, be localised negative effects of growth to contend with - e.g. in respect of landscape and heritage - but a stringent set of development management policies is set to be put in place to ensure that effects are mitigated as far as possible. A small number of recommendations are included within the above appraisal, which can be discussed during the plan’s examination (see discussion of ‘next steps’, below).

## Next steps

Part 3 of the SA Report answers – *What happens next?* – by discussing plan finalisation and monitoring.

### Plan finalisation

Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be ‘sound’. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

If found to be ‘sound’ the plan will be formally adopted by the Council. At that time an ‘SA Statement’ must be published that sets out (amongst other things) ‘the measures decided concerning monitoring’.

### Monitoring

At the current time, there is a need only to present ‘measures envisaged concerning monitoring’.

Appendix III of the plan then presents a long list of monitoring indicators. From an SA perspective, in light of the draft plan appraisal presented in Part 2 of this report, it is good to see that there is a focus on monitoring not just via analysis of planning applications, but also monitoring of the environmental and socio-economic baseline itself. For example, there is a commitment to monitor: “Change in areas and populations of biodiversity importance, including... Change in priority habitats and species (by type)”. One additional issue that could benefit from monitoring, given the likely effects of the plan (or at least given the uncertainties) is the matter of playing pitch and sports facility provision, taking into account quality as well as quantity.