

Council Assembly Report [date]: Revised Canada Water Area Action Plan

REVISED CANADA WATER AAP SUSTAINABILITY APPRAISAL ADOPTION STATEMENT

The Environmental Assessment of Plans and Programmes Regulations 2004

In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), this Statement sets out:

- How the Sustainability Appraisal Report (the SA) has been integrated into the plan
- How opinions expressed through public consultation have been taken into account;
- The reasons for choosing the plan as adopted and the difference the SA has made to the process
- The measures that are to be taken to monitor the significant effects of the implementation of the plan

How the Sustainability Appraisal has been integrated into the Revised Canada Water Area Action Plan

As part of its development of the Revised Canada Water Area Action Plan (RCWAAP), the Council undertook a Sustainability Appraisal (SA) in accordance with the Planning and Compulsory Purchase Act 2004. The Revised Canada Water Area Action Plan falls within the definition of a 'plan or programme' under European Directive 2001/42 (the 'Strategic Environmental Assessment' or 'SEA' Directive) which requires the formal environmental assessment of plans which are likely to have significant environmental effects. This SA incorporates an assessment of the strategic environmental impacts of the Revised Canada Water Area Action Plan and meets the requirements of both the Planning and Compulsory Purchase Act 2004 and EU Directive 2001/42 in a single document.

During the preparation of the adopted AAP 2012 there was a full consideration of options and alternatives throughout the 3 year preparation process between 2009 and 2011. These are set out in the full SA that accompanied the adopted AAP. The SA for the Revised Canada Water AAP focuses on the areas of the AAP which have been revised. Whilst this has been the focus, all the policies have been reassessed in order to ensure that the AAP and the SA remain coherent. The scope of the options that have been considered as part of the review are limited to the sections of the revised AAP that are have been amended due to the Harmsworth Quays site coming forward.

The Sustainability Appraisal process for the revised AAP began on 31st October 2012 when we consulted on the SA scoping report for five weeks until December 2012. At each stage in the preparation of the Revised Canada Water Area Action Plan options have been tested against a set of sustainability objectives to predict and evaluate the effects of the Area Action Plan, find ways of mitigating adverse effects and maximising beneficial effects, and to improve the sustainability of options as the AAP evolved. A Sustainability Appraisal Report was published at each stage during the production of the AAP. We prepared a final SA of the Submission Version of the AAP where consultation took place from November-December 2013. Consultation on the proposed modifications to the Canada Water AAP and the sustainability report took place in March-May 2015. The findings of the SA were taken into account at each stage in the preparation of the Revised Canada Water Area Action Plan. The outcomes of the appraisal work are based on an extensive options development, consultation and assessment process undertaken as part of the preparation of the Revised Canada Water AAP.

How opinions expressed through public consultation have been taken into account

Scoping Report and Informal Consultation

The SEA/SA Appraisal Scoping Report detailing the social, environmental and economic baseline information; sustainability issues; initial PNAAP objectives; overview of the sustainability appraisal framework and methodology; criteria and indicators was circulated to the following statutory consultees in November 2012 for comment:

- Environment Agency
- English Heritage (now Historic England) and
- Natural England (formerly English Nature and the Countryside Agency)

A number of other key organisations were also consulted in accordance with the Statement of Community Involvement, including:

- Secretary of State
- Greater London Authority
- British Telecommunications
- Bromley Council
- Corporation of London
- Lambeth Council
- Lewisham Council
- LFEDA
- London Development Agency
- Secretary of State for Transport
- Thames Water Property Services
- Southwark councillors
- Local tenants and residents associations
- Local residents and organisations on Southwark's Planning Policy mailing list
- The Coal Authority
- NHS Southwark
- Any of the bodies from the following list who are exercising functions or a function in the borough:
- Person to whom a licence has been granted under section 7 (2) of the Gas Act 1986
- Sewage undertakers
- Water undertakers.
- Any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003
- Any person who owns or controls electronic communications apparatus situated in any part of the borough.

As a significant amount of consultation had already taken place and the vision and objectives of the AAP are already established, we carried out informal consultation including workshops with landowners and developers and a public consultation event in November 2012 to inform the draft revised AAP. Notification letters and emails advertising the public consultation event were sent to around 400 local contacts on the planning policy mailing list including residents, schools, local traders, local businesses, community groups and voluntary organisations. After the event, we sent notification letters to all the tenants and residents associations in the AAP area, publicising the revisions to the AAP and indicating that officers would be happy to attend meetings to discuss the revisions if required. The event was also publicised at the Bermondsey and Rotherhithe Community Council and email alerts were sent to around 400 people on the community council mailing list. Details of the event and subsequent consultation were put on the planning policy webpages on the council's website and on the council's What's On webpage.

14 groups or individuals submitted comments on the SA scoping report. In summary the comments that were received included:

- Consideration to be given to the significance and setting of heritage assets in the plan
- Suggestions for facilitating ecological and environmental enhancement and managing flood risk and climate change
- Suggestions for additional publications, legislation and strategies to be included in the list
- Further information to be added to the baseline information
- Suggestions for further involvement in the preferred spatial options for Harmsworth Quays redevelopment

The council evaluated the feedback received in response to consultation on the scoping report and where appropriate, incorporated additional information into the scoping report. Officer responses to each consultation response is provided in the final SA report. The scoping report helped highlight those issues which were particularly important to consider when preparing the document.

Draft Revised Canada Water AAP

We then consulted on the draft Revised Canada Water AAP (the preferred option) including notifying all the statutory organisations set out in the Statement of Community Involvement (SCI), general consultation bodies including individuals and other stakeholders and local residents and businesses. The council consulted on the draft RCWAAP over a period of 12 weeks from 7 May until 30 July 2013, including a formal period of consultation of 6 weeks ending on 30 July. The plan was published on the council's website and hard copies were made available locally. An advert publicising the AAP was put in the press, the council sent written notification to around 1000 contacts on the Planning Policy mailing list and a flyer advertising the RCWAAP was sent to every address in the AAP area. Officers gave presentations on the RCWAAP at Bermondsey and Rotherhithe Community council, the area housing forum and at the Canada Water consultative forum. Exhibitions were held at Canada Water library and Surrey Quays shopping centre and 6 drop-in sessions were arranged on different days and times at these venues. In addition, officers had a stall with the exhibition and activities at Bermondsey Carnival and Rotherhithe Festival. The draft Revised Canada Water AAP was accompanied by an Interim SA. The SCI contains the consultation responses received on the draft AAP however we received no specific comments on the Interim SA.

Submission/publication consultation

Following the draft Revised Canada Water AAP consultation process, some changes have been made to the sustainability objectives and policies for the area. Areas of concern identified at the scoping and revised draft stages led to a refinement of the policies, objectives and indicators to provide further detail. Therefore the SA was updated and a final Sustainability Appraisal was published alongside the RCWAAP submission version for consultation.

At publication/submission stage, the RCWAAP was available for public inspection from 15 October 2013. It was formally published on 14 January 2014 with representations invited over a six week period ending on 25 February 2014. The RCWAAP was published on the council's website and made available at libraries, one stop shops and the council's Tooley Street offices. An advert publicising the RCWAAP was put in the press and the council sent written notification to around 1000 contacts on the Planning Policy mailing list. Officers gave presentations on the RCWAAP at Bermondsey and Rotherhithe community council and the Canada Water consultative forum.

We did not receive any comments on the SA during the publication/submission consultation.

Main Modifications to the submission version consultation

The final stage was to submit the AAP to the Secretary of State for their examination. The RCWAAP was submitted for examination on 6 May 2014 and the public hearings led by a Planning Inspector took place on 30 September 2014, 1 October 2014 and 7 October 2014. Following the close of the hearing sessions, the council proposed making a number of alterations to the plan to make sure it is 'sound'. Consultation on the potential main modifications to the AAP took place from March-May 2015 for 8.5 weeks along with updates to the sustainability appraisal. We did not receive any comments on the SA during the consultation on the main modifications. The council received the Inspector's final report in June 2015. No further substantive changes were made to the plan.

The reasons for choosing the plan as adopted and the difference the SA has made to the process

In preparing the Revised Canada Water Area Action Plan a range of options were considered to address the key issues in the area following the adopted version and changes that have taken place which necessitates the review. These included the opportunities for the redevelopment of Harmsworth Quays, creating a strategy for building heights, assessing the implications of increased population on infrastructure and any other potential changes to the area following the adopted AAP. The review took place with the participation of stakeholders including residents, landowners and developers and a thorough consultation process.

Due to the comprehensive work and consultation that took place with the adopted AAP since 2007, the RCWAAP focused predominantly on the areas identified for subsequent review in the Examination in Public, namely the opportunities to redevelop the Harmsworth Quays site which only became available after the AAP had significantly progressed.

The options we consulted on were set out in the following way:

- **The big decisions:** Informal consultation and workshops on the development options for the Harmsworth Quays site, a review of infrastructure and a review of existing policies.
- **Specific proposals:** A number of subject areas were considered for discussion in the draft AAP consultation, for example, housing, schools, community facilities, jobs and businesses, building heights and open space. The scope for redevelopment of specific site allocations was also discussed. 70 responses were received to a questionnaire prepared for the draft RCWAAP.

The scope of the options that have been considered as part of the review were limited to the sections of the revised AAP that have been amended due to the Harmsworth Quays site coming forward. In the review, all of the policies from the adopted AAP have been reassessed in order to ensure the AAP and SA remain coherent. After the preparation of the draft RCWAAP, a number of changes were made in response to feedback from the consultation which informed the final version. The results of the sustainability appraisal for the adopted AAP have also provided a good basis for assessing the revised policies and determining whether or not a potential option is likely to advance the principles of sustainability, something that the sustainability objectives are considered overall to do particularly well.

The sustainability appraisal that was prepared alongside the draft RCWAAP found that there were some areas of concern which have led to a refinement of the policies, objectives and indicators to address areas that had not been covered in sufficient detail. A final appraisal of the amended RCWAAP has subsequently

been undertaken. The appraisal found that the majority of the policies will have a positive impact. For every policy, the positive impacts outweighed the negative impacts when assessed across the whole range of sustainability objectives. In some cases the policies have no significant impact with the sustainable objective.

For almost every policy the identified positive impacts outweighed the negative impacts when taken across the whole range of sustainable objectives, although in some cases the policies had no obvious relationship with the sustainable objective. Where the SA identified potential shortcomings of particular policies, mitigation measures were proposed to help off-set the negative impacts. Some of the negative impacts will be mitigated through other proposed policies in the area action plan which will deal with such matters. These options were taken forward in the publication/submission version RCWAAP with some minor changes and tested further through the draft Sustainability Appraisal. This was then submitted to an independent Planning Inspector for examination. On 17 October 2014 the inspector issued a post hearing letter in which he identified modifications which he considered that the council should propose in order to ensure that RCWAAP would be "sound". Public consultation on the modifications took place between 16 March 2015 and 14 May 2015. Representations which were received were forwarded to the inspector.

The Revised Canada Water AAP, was subsequently found sound by the Planning Inspector in his final report issued on 19th June 2015 subject to the incorporation of main modifications as proposed by the council which were subject to a final round of consultation. The RCWAAP represents a sustainable approach to supporting development in Canada Water.

The measures that are to be taken to monitor the significant effects of the implementation of the plan

Annex 1(i) of the SEA Directive requires that significant environmental effects of the implementation of the plan are monitored. The SA of the Revised Canada Water AAP states that the Authorities Monitoring Report, will provide monitoring of the council's plans and policies. The AMR contains contextual indicators which will enable the council to monitor the impact of the RCWAAP (and other planning policy documents) on the social, economic and environmental factors. These indicators will be reviewed regularly to ensure all key sustainability objectives are covered. The results will feed into any subsequent reviews of the RCWAAP and will ensure that any sustainability/environmental impacts arising as a result of implementing the policies in the RCWAAP are identified and mitigated.