

Appendix H: ***Cabinet report 21 October 2014: Peckham and Nunhead Area Action Plan***

PECKHAM AND NUNHEAD 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 Peckham and Nunhead Area Action Plan

As part of its development of the Peckham and Nunhead Area Action Plan (PNAAP), the Council undertook a Sustainability Appraisal (SA) in accordance with the Planning and Compulsory Purchase Act 2004. The Peckham and Nunhead 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 Peckham and Nunhead 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.

The Sustainability Appraisal process began in 2006 when we consulted on the SA scoping report between November 2006 and February 2007. At each stage in the preparation of the Peckham and Nunhead 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. The findings of the SA were taken into account at each stage in the preparation of the Peckham and Nunhead 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 Peckham and Nunhead AAP.

How opinions expressed through public consultation have been taken into account

Scoping Report

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 2006 for comment:

- Environment Agency
- English Heritage 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:

- The Government Office for London
- The Greater London Authority
- British Telecommunications
- Bromley Council
- Corporation of London
- Lambeth Council
- Lewisham Council
- LFEDA
- London Development Agency
- Secretary of State for Transport
- Southwark Primary Care Trust
- Thames Water Property Services
- Southwark councillors
- Local tenants and residents associations

- Local residents and organisations on Southwark's Planning Policy mailing list
- 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.

A letter explaining the purpose of the scoping report and how it fits into the Peckham and Nunhead Area Action Plan programme was sent to over 2,500 consultees on the planning policy mailing list including residents, schools, local traders, local businesses, community groups and voluntary organisations on 10 November 2006.

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

- Suggestions for additional key plans and programmes to be included in the list
- Further information to be added to the baseline information
- Suggestions that health, open space, biodiversity and conservation issues should be given greater emphasis.

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

Future Peckham vision paper consultation

We then consulted on a Future Peckham Vision paper from 14 March to the 25 April 2008. This explained the need for, and process of preparing, the action plan and invited comments on the sort of issues in Peckham and Nunhead that are, and would be, important in the future. We also consulted on our community involvement strategy (consultation strategy), the officer responses to the consultation on the scoping report and the equalities impact assessment scoping report.

Issues and Options consultation

The council then consulted on the Peckham and Nunhead Issues and Option report which included an Interim Sustainability Appraisal (SA) Report. Formal consultation took place between 1 September 2008 to 25 May 2009.

Towards a Preferred Option consultation

We introduced a fourth stage of consultation called the "towards a preferred option". This was to ensure that we consulted fully on different options for tackling the issues we had identified in Peckham and Nunhead. Alongside the towards a preferred option we consulted on a consultation plan, a consultation report, an updated consultation strategy and updated equality impact assessment and sustainability appraisal

The Interim SA was prepared iteratively while we prepared the Towards a Preferred Option Report and informed the refinement of the options. Consultation took place between 10 May to 30 September 2011. We received 16 questionnaire responses with reference to the interim SA and there was 100% support for the document.

Preferred Options consultation

A draft SA was published alongside the Peckham and Nunhead Preferred Options report. Consultation took place between 31 January to 24 April 2012. The draft SA assessed the options we developed against a set of Sustainable Development Objectives (SDOs) and compared the social, economic and environmental effects of each. Overall, the options scored very well against the sustainable development objectives. The final Preferred Options represented the most sustainable development approaches for the borough. All the

Preferred Options scored better against the sustainable development objectives than those that had been rejected. This demonstrated the effectiveness of the Interim Sustainability Appraisal in terms of influencing the choice of Preferred Options. We received no specific comments on the interim sustainability appraisal.

Submission/publication consultation

Following the preferred options consultation process, some changes have been made to the sustainability objectives and the policies for the area. Therefore the SA was updated and a final Sustainability Appraisal was published alongside the PNAAP submission version for consultation in 12 September to 4 December 2012. 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. A Planning Inspector examined the AAP between 23 July and 1 August 2013. Following the close of the hearing sessions, the Inspector wrote to the Council asking us to consult on potential main modifications to the plan. We consulted on the potential main modifications to the AAP from 15 October 2013 to 6 January 2014, along with updates to the sustainability appraisal. We did not receive any comments on the SA during the consultation on the main modifications.

Final changes to the SA at adoption stage

A final appraisal of the AAP has been carried out to check that the final changes proposed by the inspector have addressed sustainable development appropriately.

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

In preparing the Peckham and Nunhead Area Action Plan a range of options were considered to address the key issues in the area. In deciding the options at the issues and options stage we initially considered how Peckham fits into the wider picture, the major transport improvements planned and what land is available in the area.

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

- **The big decisions:** these focused on what type of development we should favour over other types.
- **Growth dependent options:** these set out the choices that different levels of growth in the area will allow. There were three sets of options, one looking at a high level of growth, a low level of growth and a limited level of growth.

After the preparation of the issues and options, it was decided that a number of further options should be considered in the area action plan. These were set out in the Towards a Preferred Option report. The Towards a Preferred Option document set out our preferred approach where we had already identified this and some further issues for consideration. This included a mix of options from the issues and options report however generally we took forward Option A from the 'big decisions' section of the report and the high growth option in the 'growth dependent' section. The results of the Issues and Options SA showed that the overall impact of Option A was more positive in terms of social, economic and environmental impacts than for Option B. The Towards a Preferred Option set out a number of policies which sought to balance housing growth, with growth in other areas such as employment, leisure provision, arts and culture and social and community infrastructure.

The sustainability appraisal that was prepared alongside the Preferred Options report found that the policies in the Preferred Option document were sustainable. 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 AAP with some minor changes and tested further through the draft Sustainability Appraisal. This was then submitted to an independent Planning Inspector for examination. The Peckham and Nunhead AAP, as adopted, has been found sound following examination by the Planning Inspector and represents a sustainable approach to supporting development in Peckham and Nunhead.

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 Peckham and Nunhead 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 AAP (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 AAP and will ensure that any sustainability/environmental impacts arising as a result of implementing the policies in the AAP are identified and mitigated.

In addition, Appendix D of the AAP provides a more focussed framework to enable the council to monitor the success of the AAP policies themselves.