London Borough of Barking and Dagenham


Core Strategy Strategic Environmental Assessment Post Adoption Statement 16 August 2010

The London Borough of Barking and Dagenham adopted its Core Strategy on 21 July 2010.

This Statement has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), which require a statement to be produced on adoption of a plan, to detail:

i) how environmental considerations have been integrated into the plan;
ii) how the environmental report has been taken into account;
iii) how opinions expressed through public consultation have been taking into account;
iv) the reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with; and
v) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

How environmental considerations have been integrated into the plan

The undertaking of the sustainability appraisal process has ensured that environmental considerations have been integrated into the plan from the outset of preparation. There are three elements to this:

i) Scoping Stage

ii) Environmental appraisal of emerging LDF policy

iii) Reporting on the sustainability effects of the plan/draft plan

Scoping Stage

In the early stages and prior to the Issues and Options stage of the LDF in 2005, the initial Sustainability Appraisal Scoping Report was drafted. This reported on the methodology to be adopted in appraising the LDF and incorporated the SA Framework. The SA Framework comprised a set of objectives against which emerging LDF policy would be appraised.

Environmental appraisal of emerging LDF policy

The LDF Issues and Options consultation presented a series of broad questions relating to options for the following topic areas:

- Overall Vision
- Site Allocations
- Environment
- Community
These alternatives were appraised by environmental policy officers within the Council in consultation with the key bodies such as Natural England, the Environment Agency and English Heritage. The results of this work informed the development of more refined options being prepared by the policy team as part of preferred options report. The preferred options were then also appraised and were reported and consulted on in the Sustainability appraisal report of the core strategy preferred options and the Sustainability appraisal of report of the borough wide development policies preferred options. As a result of the earlier iterations of appraisal work, environmental considerations had been integrated into the preferred options stage of the LDF and this is well demonstrated in the Core Strategy and the Borough Wide Development Policies Preferred Options reports (published in March 2007) which present the sustainability appraisal outcomes for the preferred options and its alternatives in the justification text to the policies.

Reporting on the sustainability effects of the plan/draft plan

The sustainability effects of the Core Strategy were reported on at the following stages:

- Initial sustainability appraisal of the policy options for the Core Strategy DPD - 2006.
- Sustainability appraisal of the core strategy policies. Environmental Report produced 2007 Sustainability appraisal report of the core strategy preferred options.
- Sustainability appraisal of the core strategy policies. Environmental Report produced 2009 Sustainability appraisal of the core strategy pre-submission policies.

The submission version of the Core Strategy was identical to the pre-submission version.

How the environmental report has been taken into account;

The iterative process of undertaking sustainability appraisal of the Core Strategy involved the production of two Environmental Reports; one at preferred options stage and the other at pre-submission stage. At each of these stages the Environmental Reports were published on the Council’s website and targeted consultation held with the environmental consultees (English Heritage, Natural England and the Environment Agency) and the statutory consultees for the Core Strategy. At preferred options stage the
targeted consultation on the sustainability appraisal work was extended to include all stakeholders and the wider public. Consultees therefore responded to the Core Strategy policies with the benefit of being informed about the outcome of the sustainability appraisal of the proposed policies.

The two Environmental Reports were also taken into account by the Council in the refinement of the Core Strategy policies. Chapter 7 of the Sustainability Appraisal of the Core Strategy policies includes two tables which show how the pre-submission Core Strategy policies were refined directly as a result of the findings in the of the Sustainability Appraisal of the Core Strategy preferred options report.

The final Environmental Report comprises the *Sustainability appraisal of the core strategy policies pre-submission report* together with the *Sustainability appraisal of the advertised proposed changes to the submission core strategy policies*. The Environmental Report identifies the remaining significant positive and negative impacts of the submitted Core Strategy. These predicted impacts will be monitored during the lifetime of the plan (see v below).

### iii) how opinions expressed through public consultation have been taking into account;

Public consultation exercises took place at the following stages of Core Strategy preparation

1. Issues and Options consultation and Sustainability Appraisal Scoping Report consultation (Nov 05 – Jan 06).
2. Preferred Options consultation and consultation on the Sustainability Appraisal of the Preferred options (March – May 07).

The details concerning the first two phases are set out in the *Council’s Pre-submission consultation statement: core strategy and borough wide development policies*. This report documents who we consulted, how we consulted, a summary of the main issues raised and also how these have been addressed in the Development Plan Documents. This report demonstrates how opinions expressed through public consultation have provided a key input into the Core Strategy policies as they emerged.

The submission version of the Core Strategy was identical to the pre-submission version. Alongside this the Council also submitted a schedule of representations received on the pre-submission Core Strategy together with the representations themselves. In order to address issues raised by representors at the pre-submission stage the Council produced the document *Schedule of proposed changes to the submitted Core Strategy* in July 2009. The Inspector considered these proposed changes alongside the pre-
submission representations as well as the representations received during the hearings themselves.

The reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with;

The Core Strategy is the principal document of the Local Development Framework and provides the vision, objectives and spatial policies to guide development in the borough up to 2025. It establishes the following broad spatial strategy:

- Majority of growth to be located in key regeneration areas identified as Barking Riverside, Barking Town Centre and South Dagenham.
- Employment growth to be directed to Dagenham Dock, Strategic Industrial Locations and Locally Significant Industrial Sites across the borough.
- Growth to be focused on previously developed land.
- Priority to improve transport infrastructure and tackle flood risk in the borough.

In determining the General Principles for Development as set out in Policy CM1 five alternatives were considered involving varying combinations of the following:

- Focusing development on key regeneration sites.
- Focusing development on existing residential areas.
- Focusing development on Green Belt sites.
- Focusing development on sites with high PTAL levels.

To determine the most appropriate strategy for Managing Housing Growth set out in Policy CM2, three alternatives were considered:

- Different levels of housing growth.
- Allowing higher density development around all areas with moderate and high PTAL levels.
- Allowing higher density development in existing residential areas outside of town centres.

In the process of choosing the spatial strategy in light of the alternatives above the Council considered the feedback from the Issues and Options consultation, the outcome of testing these against the sustainability appraisal framework but also the regional and national planning policy context. The reasons for choosing the spatial strategy can be summarised as follows:

- A Council commitment not to review the extent of the Green Belt in light of the availability of previously development land in the borough.
- National government policy. The Borough is located within the heart of the Thames Gateway which during the 1990s was identified as a key priority for national government in meeting the pressing need for new homes and jobs in London and the South East. The government’s Sustainable Communities: Building for the Future
document produced in 2003 confirmed that the Thames Gateway would be one of four priority areas for the development of new residential communities in order to tackle South East England’s need for additional housing.

- Regional government policy. The London Plan (Consolidated with Alterations since 2004) endorses the government’s approach to the Thames Gateway area and gives priority to its regeneration. It established the following strategic requirements for the borough.

- Annual housing provision of 1,190 dwellings.
- Transfer of about 62 – 84 ha industrial land to other uses.
- Identification of London Riverside as an Opportunity Area with the potential for over 20,000 new homes and 14,000 new jobs.
- Identification of Strategic Industrial Locations.

In addition to the broad spatial strategy, each of the spatial policies set out in the Core Strategy has emerged following the consideration of reasonable alternatives. These alternatives are documented in the Issues & Options papers and the Preferred Options report. The sustainability appraisal of the alternatives is documented in the following places:

- In Appendix 10 to the sustainability appraisal report for the core strategy pre-submission policies.
- In Appendix 10 to the sustainability appraisal report for the core strategy preferred options.
- In the initial sustainability appraisal of the core strategy options

v) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

Chapter 8 in the Sustainability Appraisal Report identifies the key areas where the Core Strategy DPD is expected to have significantly sustainability effects (both positive and negative) and details how these will be monitored. In the majority of cases this will be through existing monitoring mechanisms. The Annual Monitoring Report for the LDF will report on the monitoring of the significant effects during the lifetime of the plan.