

# Wandsworth Local Plan

## Employment and Industry Document

### Integrated Impact Assessment Adoption Statement

December 2018



# Wandsworth Employment and Industry Document: Integrated Impact Assessment Adoption Statement

## List of Contents

Chapter	page
1 Introduction: the Sustainability Appraisal Adoption Statement .....	1
2 How Environmental Considerations Have Been Integrated Into the Wandsworth Local Plan Employment and Industry Document .....	2
3 How the Integrated Impact Assessment (IIA) report has been taken into account .....	3
4 How Opinions Expressed During Consultation Have Been Taken into Account .....	4
5 The Reasons for Choosing the Local Plan as Adopted in the Light of the Other Reasonable Alternatives Considered .....	6
6 Monitoring Implementation of the plan: monitoring significant effects and mitigation of adverse effects .....	7
7 Further information .....	8
Appendix 1 .....	9

## 1 Introduction: the Sustainability Appraisal Adoption Statement

1.1 Sustainability Appraisal (SA) is a systematic and iterative process that must be carried out during the preparation of a Local Plan. SA incorporates the requirements for Strategic Environmental Assessment (SEA) and this Sustainability Appraisal Statement for the Wandsworth Local Plan Employment and Industry Document (LPEID) has been prepared in accordance with the following requirements:

- Regulation 26 of the Town & Country Planning (Local Planning) (England) Regulations 2012;
- Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004; and
- Paragraph 165 of the National Planning Policy Framework 2012 (paragraph 32 in the NPPF revised, July 2018).

1.2 The Wandsworth Local Plan Employment and Industry Document (LPEID) was adopted on 5 December 2018. In accordance with European and national legislation development plans must be subject to Sustainability Appraisal and Strategic Environmental Assessment (SEA) processes. In accordance with good practice, the Council has incorporated Health Impact Assessment, Habitats Regulations assessment and Equalities Impact Assessment alongside the SA into an integrated impact Assessment (IIA) of the LPEID policy options, policies and main modifications.

1.3 For the purpose of this Statement that complies with planning and environmental assessment regulations, the integrated appraisal will be referred to as the Sustainability Appraisal (SA). The SA process comprises a number of [stages](#) that are designed to comply with the requirements of the SEA Regulations and as guided through Government Planning Practice. This SA Adoption Statement satisfies the SA/SEA requirements for this post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:

- How environmental considerations have been integrated into the plan;
- How the Sustainability Appraisal report has been taken into account;
- How opinions expressed through public consultation have been taken into account;
- How the results of any consultations entered into under regulation 14(4) have been taken into account;
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

1.4 Full details of the SA process are set out in the Integrated Impact Assessment (IIA) report (March 2017) submitted with the Local Plan.

## **2 How Environmental Considerations Have Been Integrated Into the Wandsworth Local Plan Employment and Industry Document**

2.1 Environmental and wider sustainability considerations have been integral to the key decisions made in respect of the policies and proposals of the Wandsworth Local Plan Employment and Industry Document (LPEID). The integration of these considerations into the plan making process has principally been achieved through:

- The development of a comprehensive Employment Land and Industry evidence base, and consideration of new site allocations has integrated environmental, social and economic considerations into the LPEID particularly through the promotion of higher density mixed use areas, . Screening for biodiversity impacts, and new policies offer resilience against flood risk, climate change and improving public health outcomes have been developed together;
- Continuous engagement with key stakeholders and the public on the emerging LPEID and related environmental and sustainability matters;
- The consideration of national planning policy and the objectives of other plans and programmes;
- Fulfilment of the Council's Duty to Cooperate; and
- ongoing assessment including SA (see Section 2.2) as well as Habitats Regulations.

2.2 In accordance with the NPPF, the delivery of sustainable development underpins the LPEID:

- To strengthen and broaden the local economy and provide local employment opportunities close to home;
- To provide sufficient housing to meet local housing need and support economic growth;
- To reduce the need to travel;
- To protect the built and natural environment; and
- To develop sustainable communities, and seek to ensure that adequate community facilities are provided.

2.3 During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for developing the LPEID. The SA was undertaken in accordance with government guidance which encourages a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors.

2.4 Stage A Scoping Report: Independent specialist consultants were appointed to carry out the first (scoping) stage which involved updating and collating baseline information on environmental economic and social factors, key plans and projects. This aimed to provide an updated 'baseline' from which to measure the effectiveness of the plan, and to update as necessary the Sustainability Objectives. Consultation on the draft Scoping Report helped to identify relevant plans, strategies and projects, up to date data and statistics, and any data gaps. The final version was published on the Council's website in October 2016. Consultants worked closely with the plan-making team, Public Health Wandsworth, and the Council's Corporate Policy

Team/Equalities officer as well as 'Enable' (a staff Mutual with Parks, sports, leisure and biodiversity responsibilities) to this end. The following table sets out the timeframe which was followed for the adopted LPEID:

STAGE	EXERCISE	TIMEFRAME
Stage 1 Preparation	Regulation 18 preparation stage consultation	Dec 2015 - Jan 2016
	Employment land and premises study	Apr - Jul 2016
	Call for Sites	Jun - Sep 2016
	Policy Options consultation	Oct 2016
Stage 2 Publication	Publish submission version	Mar 2017
	Regulation 19 submission version consultation	Mar - Apr 2017
Stage 3 Examination	Submission to Secretary of State	Oct 2017
	Examination	Dec 2017- Apr 2018
Stage 4 Adoption	Adoption	Jul 2018 - Dec 2018

### 3 How the Integrated Impact Assessment (IIA) report has been taken into account

3.1 The LPEID is a partial review of the Local Plan 2016, which in itself was subject to ongoing IIA reporting. The review is focussed on revising the Employment and Industry policies of the adopted Local Plan. Sustainability Appraisal of the LPEID commenced with an update of the Scoping reports, and this baseline information has provided an evidence base for the policy approach and informed the updated monitoring indicators.

#### Environmental and Sustainability Considerations in the IIA Report:

3.2 To provide the context for the SA exercise, and in compliance with the SEA Directive, a review of other relevant plans and programmes was undertaken and the relevant aspects of the current state of the environment were considered and together they informed the identification of a series of key sustainability issues. The key sustainability issues identified through the review of plans and programmes and analysis of baseline information were analysed to review the SA objectives used to appraise the adopted Local Plan, the LPEID policies and policy options (the SA Framework). It was established that the existing 20 SA objectives were still the most relevant, and continue to represent the preferred sustainability outcome which usually involved minimising detrimental effects and enhancing positive effects.

3.3 The SA process considered the contribution of the LPEID policy options towards each of the appraisal objectives, drawing on the baseline information to predict the likely significant effects in line with the SEA Directive 19. 'Reasonable policy alternatives' were identified and appraised, along with a 'No plan' and 'London Plan only' options. Appendix 1 of the [IIA](#) (March 2017) shows how each of policy options have been assessed to identify the predicted effect of each option against the 20 SA objectives, with a short concluding summary. A colour coded approach clearly

identifies positive, negative and neutral predicted effect on each objective for each policy option and from which an overall effect can be seen.

3.4 The appraisal exercise identified the likely changes to the baseline conditions as a result of the LPEID's implementation. The predicted effects were described (where possible) in terms of their extent, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, short, medium and/or long-term. Identification of mitigation measures and indicators in the IIA report and in Appendix 1 of this Statement will seek to address any negative impacts, and provide an updated monitoring framework to identify the effects of implementing the policies over time on the SA objectives.

#### Examination/Main Modifications:

3.5 Screening and consultation of the Main Modification and screening opinion showed that no further IIA work was required and that the IIA consultation applied to the final LPEID policies, following receipt of the Inspector's report.

## **4 How Opinions Expressed During Consultation Have Been Taken into Account**

4.1 Comments on all stages of the draft LPEID and IIA report were summarised in the respective Statements of Consultation, alongside the Council's response and any proposed changes to policy were produced and published after each stage of consultation. Comments on the draft Scoping reports, IIA report and SA screening of the Main Modifications was also carried out in parallel to the various drafts of the LPEID, and any resulting comments or changes to policy were made public in the appropriate Statement of Consultation.

4.2 As set out above, the development of the LPEID has been informed by extensive, ongoing engagement and public consultation, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. For submission of the Plan to the Secretary of State, the Council published a Consultation Statement which sets out the consultation undertaken during the preparation and publication of the Plan, a summary of the main issues raised and details of how the comments received have been taken into account. A separate report was also submitted as part of the Examination documentation detailing how the Duty to Cooperate requirements had been met.

#### The Scoping Report

4.3 Consultation on the [draft Scoping Report](#) (Examination document reference PS/002) took place between 15th August and 16th September 2016 and included the statutory SEA consultees. The [consultation responses](#) (Examination document reference SD/0028) on the draft report and [final Scoping report](#) October 2016 (Examination document reference SD/027) are published on the website. The Scoping Report updated social, economic and environmental baseline data, corporate regional and national priorities, plans programmes and strategies including those of key stakeholders and statutory consultees (Historic England, Natural England, the Environment Agency, as well as Public Health Wandsworth and

provided the basis to assess whether the previous sustainability objectives in the last Local Plan IIA report (2015) needed to be amended. It was found that the current IIA objectives continued to be relevant and robust, having been recently tested as part of the adopted Local Plan and consultation on the LPEID draft scoping report did not produce any objections to the suggested IIA objectives or sustainability framework.

#### LPEID Preparation stage

4.4 The Scoping report assisted in preparing a broad set of policy options and priorities that the Plan needed to address. The Statement of Consultation [Preparation stage](#) (first Regulation 18 consultation) reports on the consultation process and the outcome of the consultation.

4.5 Following consultation and in light of further evidence, the LPEID Policy Options document refined the broad issues resulting from the consultation and collection of evidence into 67 policy options. For each policy, a number of options were identified from a range of sources including the existing approach set out in the adopted Local Plan (2016), findings of the Employment Land and Premises Study, representations from the Preparation stage (first stage Regulation 18) consultation, meetings with external and internal stakeholders, the London Plan and national guidance. The IIA report accompanying the Proposed Submission LPEID (March 2017) assessed each of these options in a matrix comprising the 20 IIA objectives. The reasonable alternatives policy options included the 'no plan' option, rely on London Plan policies and 'do nothing' options. The IIA report was submitted as part of the evidence base, with the conclusion of the appraisal matrices justifying the preferred policies and site allocations (IIA of Proposed Submission LPEID).

4.6 The [Statement of Consultation for the](#) Policy Options, March 2017 (second stage Regulation 18 consultation) sets out the consultation process, comments made, the Council responses and outcomes of the consultation process to inform the final submission changes to the LPEID policies, alongside the outcome of the IIA and Duty to Cooperate discussions.

4.7 [Consultation on the Proposed Submission LPEID](#) (Regulation 19) and the accompanying IIA Report informed a number of Modifications which were submitted for Examination alongside the Proposed Submission version of the LPEID.

#### Post Hearing Main Modifications

4.8 A version of changes with the Council screening opinion was consulted on alongside a list of additional modifications. [A screening opinion of the Main Modifications](#), and the reasons for this opinion was published alongside the changes. No comments were received on this screening exercise. The Inspector's report included a list of the [Main Modifications](#) considered necessary to make the plan sound. These Main Modifications were already screened and consulted on and, following receipt of the inspector's report, were published on the Council's website.

#### Duty to Co-operate Statement

4.9 The Submission Duty to Co-operate Statement (Examination submission document [reference SD/115](#)) also sets out the Council's active engagement in the preparation of the Local Plan with the prescribed bodies including the Environment

Agency, Natural England and Historic England.

#### Habitats Regulations Assessment (HRA):

4.10 From the initial consultation on the draft Scoping report, the Preparation stage LPEID, to the Policy Options LPEID and accompanying IIA report (Proposed Submission, March 2017), engagement took place with Natural England regarding compliance with the Habitats Assessment Regulations and is contained on the Examination pages of the website, in particular ( [PS-003](#) Initial Screening Opinion email WBC to Natural England and [PS-005](#) Natural England Response 21 November 2017). The outcome concluded that the LPEID and the proposed mitigation measures set out in the IIA satisfied Natural England that no further assessment was required. This correspondence was submitted to the Examination Inspector and is contained on the website and in the Examination documentation (Submission document [reference SD/017](#)).

## **5 The Reasons for Choosing the Local Plan as Adopted in the Light of the Other Reasonable Alternatives Considered**

5.1 Article 5 (1) of the SEA Directive and SEA Regulation 12(2) require that “an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated”. Information to be provided includes “an outline of the reasons for selecting the alternatives ....” (SEA Directive Annex I (h) and SEA Regulations Schedule 2 (8)). The European Commission guidance on the SEA Directive states that “The alternatives chosen should be realistic. Part of the reason for studying alternatives is to find ways of reducing or avoiding the significant adverse effects of the proposed plan or programme”. Sustainability Appraisal has been an iterative process undertaken alongside and integrated with the development of the LPEID itself, starting with the first stage – updating the Scoping report. The ‘reasonable alternatives’ considered in preparing the LPEID and appraised in the IIA report have related to:

- Development scenarios (the amount of growth to be accommodated);
- Spatial development options (where, in broad terms, employment, business and industrial growth should be located); and
- Site allocations.

5.2 The key findings of the IIA support the Council’s selection of the preferred policy against the listed alternatives, which were also appraised. Full details of the outcomes of the policy options appraisal and appraisal matrices of all the alternative options are contained in section 6 and the Appendix 1 of the IIA Report (March 2017) and which informed the Proposed Submission Employment and Industry Policies, alongside the outcome of consultation and other relevant evidence. The LPEID was then examined against the national and regional (the London Plan) policy framework, and other local policies, the prescribed consultation procedures and the requirements of SA/SEA regulations and has been found sound ([Inspector’s Report and Final Main Modifications](#)). The following documents demonstrate that all reasonable options and alternatives were generated, appraised selected or rejected,

and the role of the IIA:

- Statement of Consultation [Preparation stage](#) (first Regulation 18 consultation);
- Statement of Consultation [Policy Options consultation](#) March 2017 ( second Regulation 18 consultation);
- The Proposed [Submission Statement of Consultation and Integrated Impact Assessment \(IIA\) report \(March 2017\)](#); and
- The [Main Modifications consultation](#) document – which was produced after the hearing and which includes a screening assessment of each Main Modification to establish if further sustainability appraisal is required.

5.3 Not all the IIA objectives are impacted by the policy options, as can be reasonably expected from the limited scope of the LPEID review which focusses only on employment and industrial land. Similarly, the limited scope of the review means that the full outcome of impacts resulting from the inter-relationship between all the remaining adopted Local Plan policies will not be able to be fully identified until the Full Review of the Local Plan takes place and which will be reported in a new IIA report when all the local plan/site allocation changes are proposed.

5.4 The Council considers that the LPEID embeds sustainable development over the plan period, and this view has been supported by the Examination Inspector.

## **6 Monitoring Implementation of the plan: monitoring significant effects and mitigation of adverse effects**

6.1 Monitoring allows the actual significant environmental effects of implementing the LPEID policies to be tested against those predicted in the appraisal matrices of the IIA report. It therefore helps to ensure that any problems which arise during implementation, whether or not they were foreseen, can be identified and future predictions made more accurately. The SEA Regulations (17 (1)) set out that “The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”. The Regulations are clear that it is not necessary to monitor everything. Instead, monitoring should focus on significant effects. Monitoring can be integral to compiling baseline information for future plans and programmes, and the monitoring and evaluation of progress towards objectives and targets can form a crucial part of the feedback mechanism. SEA guidance confirms that monitoring in accordance with the Directive can be incorporated into existing monitoring arrangements

6.2 National Planning Practice Guidance (NPPG) states that details for monitoring the significant effects of implementing a local plan must be included in the sustainability report, the post adoption statement or in the local plan itself. The Guidance also states that the monitoring results should be reported in the local planning authority’s monitoring report (AMR). Monitoring the adopted LPEID for sustainability effects over time can help to answer questions such as:

- Were the SA's predictions of sustainability effects accurate?
- Is the Local Plan contributing to the achievement of desired SA objectives?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

6.3 [Proposals for monitoring](#) the LPEID were prepared in 2017 for submission to the Examination Inspector. Changes to Monitoring indicators relating to the replacement employment, business and industry policies in the LPEID have been identified in, and attached as Appendix 1 to this report. This monitoring framework includes significant effects indicators for the last stage (Stage E) of the sustainability process. The information monitored will be published on the Council's website on a topic basis, which together form the Wandsworth Authority Monitoring Reports (AMR), as required by the current planning regulations. The monitoring results, and any significant changes in circumstances over time, including outcomes from the Full Review of the Wandsworth Local Plan, will assist in informing any future changes to the LPEID policies. The effectiveness of the IIA/SEA process will be informed by the results of the collection of updated baseline data according to the LPEID indicators. Monitoring of the significant effects indicators on the LPEID will identify where mitigation/remedial action is required if objectives and targets are not met.

## **7 Further information**

7.1 The timetable for Local Plan and SPD review is set out in [the Local Development Scheme](#) (LDS) and published on the website. Further information on Local Plan progress including the [Annual Monitoring Report](#) (AMR) and any future Scoping report/sustainability report updates are available on the [Planning Policy](#) web pages.

**5 December 2018**

## Appendix 1: Monitoring Framework

Changes to Monitoring indicators relating to the replacement employment, business and industry policies in the LPEID were prepared in 2017 for submission to the Examination Inspector and are set out in the table below. The monitoring framework in the table below includes significant effects indicators for the last stage (Stage E) of the sustainability process and results will be published on the Council's website forming part of the Wandsworth Authority Monitoring Reports (AMR). The effectiveness of the IIA/SEA process will be informed by the results of the collection of updated baseline data according to the LPEID indicators, and monitoring of the significant effects indicators on the LPEID will identify where mitigation/remedial action is required if objectives and targets are not met.

Indicator		Linked to SA Baseline	Significant Effects	Policies Monitored
EM 01	Amount and percentage of floorspace (m2) available by Use Class	*	*	EI 1
EM 02	Employment by employment category in Wandsworth and regeneration areas	*	*	PL1
EM 03	Percentage change in the number of VAT and PAYE registered businesses in Wandsworth and regeneration areas		*	PL1
EM 04	Claimant Count (Unemployment) Rate in Wandsworth and regeneration area	*	*	PL1
EM 05	Number of jobs created through new development in Nine Elms within the Central Activities Zone		*	PL11
EM 06	Amount of commercial and employment floorspace completed, granted planning permission and in the development pipeline including percentage by location (SIL, LSIA, IBP, Focal Points of Activity, Town Centres, Local Centres, CAZ Frontages in Nine Elms, EPAs and EUIAs)		*	EI 1, EI 2, EI 3, EI 6 PL8, PL9, PL12, PL13, PL14, PL15, IS6, DMO8, DMTS1, DMTS2, DMTS3, DMTS12, DMC1, DMC2
EM 07	Number of developments for economic uses over 1000sqms which include affordable, flexible or managed workspace		*	EI 1, EI 4
EM 08	Number and percentage of vacant business premises by location (SIL, IBP, EPAs and EUIAs)	*		EI 1, EI 2, EI 3, PL1
EM 09	Percentage of planning permissions securing replacement commercial or employment floorspace in SIL, LSIA, IBP, EPAs and EUIAs			EI 1, EI 2, EI 3, EI 6, EI 7,
EM 10	Planning permissions granted and development completed resulting in the loss of industrial or employment floorspace in SIL, LSIA			EI 1, EI 2, EI 3, EI 6, PL9
EM 11	Loss of commercial floorspace in Core, Secondary and Other shopping frontages			PL8, DMTS3, DMTS4, DMTS5, DMTS6, DMTS7
EM 12	A1 completions in Wandsworth's existing Town Centres PL12 and Battersea Power Station CAZ Frontage			PL12
EM 13	Proportion of A1 retail units in Town and Local Centre Core Frontages			PL8, DMTS3
EM 14	Proportion of A1 retail units in Town and Local Centre Secondary Frontages			PL8, DMTS4
EM 15	Proportion of A1 retail units in Important Local Parades			PL8, DMTS5
EM 16	Percentage of vacant units within Town Centres	*		PL8
EM 17	Percentage of vacant units within Southside Shopping Centre			PL12
EM 18	Size / vacancies in street markets			PL8, DMTS11
EM 19	Number of hotel rooms (C1) completed and/or in the development pipeline			PL8, DMTS13
EM 20	Amount of land in waste management use (ha)			EI 8,
EM 21	Loss of existing waste management facilities			EI 8,
EM 22	Number of Safeguarded Wharves	*		EI 9, PL9
EM 23	Safeguarded waste management sites		*	EI 8
EM 24	Capacity of New Waste Management Facilities			EI 8, IS6
EM 25	Number of developments approved and completed resulting in a net loss of A1-A5 floorspace outside protected parades			PL8, DMTS7
EM 26	No loss of economic floorspace in Employment Protection Areas	*	*	EI 3
EM 27	Number of railway arches brought back into use			EI 3
EM 28	Number of planning permissions in Focal Points of Activity for change of use or redevelopment to a town centre use			EI 3