Integrated Impact Assessment (IIA)

Question 1
Are there any other Policies, Plans, Programmes, Strategies and Initiatives (PPPSIs) which should be considered for review?

2 responses. Key points:

The Environment Agency and Historic England recommended some additional policies, plans, strategies or initiatives to be considered by the Council when establishing the policy context for the upcoming integrated impact assessment. These related to planning for flooding guidance as well as guidance on the protection of the historic environment. Guidance for SEA/SAs in relation to the PPPSI section recommend that the number of these documents are kept relatively limited to ensure that the section is properly focussed upon the most significant policy documents. As a rough ‘rule of thumb’ it is recommended that this number is between 12-20. It is important to ensure that the additional documents that each consultee has suggested is necessary and has sufficient significance for the LPPR to warrant inclusion.

Question 2
Do you have any comments on the accuracy, scope and coverage of the baseline data or know of any further data or indicators that might provide useful information? If so, please provide details.

1 response. Key points:

Historic England noted that the IIA Scoping Report at Section 7 (baseline evidence) does not currently address the historic environment. HE suggests that this needs to be addressed in the report. HE have recommended that a borough-wide characterisation report or overview for the historic environment would be helpful in developing a positive strategy. The Council already has an architectural review of the Royal Borough’s historic architecture, which was used to inform the production of policies for the Core Strategy in 2010. This document will form part of the evidence base for the LPPR and will inform the IIA assessment. HE also suggests that the work they are currently undertaking as part of the review of the Archaeological Priority Areas could be incorporated into the IIA process.
Question 3
Do you have any comments on the sustainability issues and problems identified for the Borough or know of any further issues and problems that should be included?

1 response. Key points:

Historic England suggested an additional sustainability issue/problem which involves reconciling new development with the existing high quality townscape.

Question 4
Do you have any comments on the IIA objectives or know of any further IIA objectives that should be considered?

1 response. Key points:

The Environment Agency submitted comments suggesting that a “reduction in per capita waste generation could be added [to the IIA waste objective 11] to encourage waste minimization and help overall waste targets in terms of direction of travel and to make the overall set of objectives more ‘circular’ in approach. An additional indicator of tonnage of waste per capita could also be included.” At present the existing IIA objective relating to waste is ‘to reduce the amount of waste produced and maximise the amount of waste that is recycled’. The EA’s amendment to the existing objective is more specific and measurable, especially with the additional indicator to improve the Council’s monitoring of the issue. Historic England suggested amending objective 16 to read ‘to conserve and enhance sites, feature and areas of historical, archaeological and cultural heritage’.

Question 5
Do you have any comments on the assessment framework?

See EA response to Question 4 for a proposed amendment to the IIA assessment framework.

Habitat Regulations Assessment (HRA)

Question 1
Do you have any comments on the Habitats Regulations Assessment (HRA) Screening report?

1 response. Key points:

The Council considered the impact of the LPPR on the nearest (Natura 2000) sites as part of the initial screening process for a Habitats Regulation Assessment. For the purposes of the screening exercise, the Council considered the impact on Richmond SAC and Wimbledon SAC and concluded that there would be no significant effect on these sites. Natural England confirmed that the Council does not need to undertake the next stage of the HRA process as the LPPR is unlikely to have a significant impact on these sites.