



The Royal Borough of Kingston Upon
Thames

New Local Plan

Interim Integrated Impact Assessment Report
Non-Technical Summary



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1 Introduction

1.1 Overview

- 1.1.1 The Royal Borough of Kingston Upon Thames (RBKT) is in the process of preparing a new Local Plan for the Borough. The new Local Plan will set out how development will be planned and managed across the borough through to 2041.
- 1.1.2 RBKT has commissioned WSP to undertake an Integrated Impact Assessment (IIA) which will ensure that sustainability aspects are incorporated into the new Local Plan. This Non-Technical Summary introduces the IIA and summarises the contents of the full technical report.

1.2 The New Local Plan

- 1.2.1 The new Local Plan will set out the vision for future development in the borough through to 2041. The Local Plan will cover a wide range of different and interrelated issues that need to be considered when new development is proposed to ensure it can be managed to deliver the most benefit for the borough's communities and local environment.
- 1.2.2 The Local Plan seeks to build upon previous borough-wide consultations and respond to the many ideas and key issues identified by local communities, local groups, businesses, infrastructure providers and other partners that have contributed to the plan-making process so far.
- 1.2.3 It also includes an emerging vision and a number of objectives to capture our commitments to local communities, including enhancing our natural environment, protecting our heritage and addressing the climate emergency.
- 1.2.4 The new Local Plan includes 65 policies and 26 site allocations, with an additional 20 alternative sites.
- 1.2.5 Further details on the vision, objectives and policies can be found in **Section 2** of the main **IIA Report**.

2 IIA Methodology

2.1 What is IIA?

2.1.1 Sustainability Appraisal is a systematic process that is undertaken during the preparation of a plan. Its role is to promote sustainable development by assessing environmental, social and economic impacts, as well as mitigating any potential adverse effects that the plan might otherwise have.

2.1.2 The IIA combines the following assessment processes:

- Sustainability Appraisal (SA);
- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Habitats Regulations Assessment (HRA).

2.1.3 **Figure 2-1** below shows the relationship of each of these IIA elements.

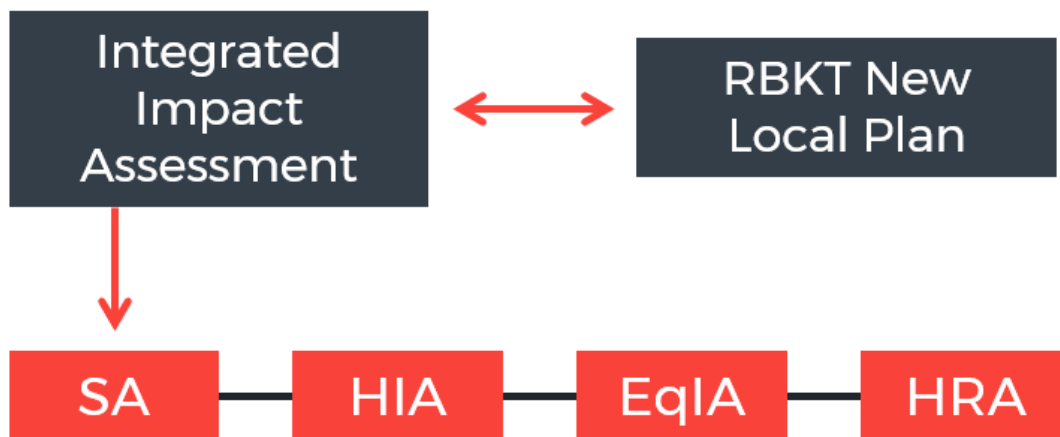


Figure 2-1 - Relationship of IIA Elements

- 2.1.4 An integrated assessment approach enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. A single process can improve efficiencies in the assessment itself, as many of the issues covered in the different forms of assessment overlap. This process also helps to simplify outcomes and recommendations for policymakers.
- 2.1.5 Each component of the assessment has been described below:
- **SA:** The SA process is carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which emerging plans will help to achieve relevant environmental, economic and social objectives.
 - **EqIA:** The EqIA process focuses on assessing and recording the likely equalities effects as a result of a policy, project or plan. It seeks to ensure that the policy, project or plan does not discriminate or disadvantage people and enables consideration of how equality can be improved or promoted. The equality duty came into force in April 2011 and covers the following nine Personal Protected Characteristics:
 - Age;
 - Disability;
 - Gender;
 - Gender reassignment;
 - Marriage and civil partnership;
 - Pregnancy and maternity;
 - Race;
 - Religion or belief; and
 - Sexual orientation.
 - **HIA:** The HIA process is used to identify the likely health effects of plans, policies or developments and to implement measures to avoid negative impacts and promote opportunities to maximise the benefits. There is no formally adopted methodology for HIA although there is a body of practice and guidance at a policy level.
 - **HRA:** The HRA assessment is undertaken to identify whether plans or projects will be likely to have a significant effect on a designated site. The stages of HRA assessment are as follows:
 - Stage 1: Screening: initially identifies the likely impacts upon a Natura 2000 site of a plan or project, either alone or in combination with other plans or projects, and considers whether these impacts are likely to be significant;
 - Stage 2: Appropriate Assessment: the detailed consideration of the impact on the integrity of the Natura 2000 sites of the plan or project, either alone or in combination with other plans or projects, with respect to the site's

conservation objectives and its structure and function. This is to determine whether there will be adverse effects on the integrity of the site;

- Stage 3: Assessment of alternative solutions: the process which examines alternative ways of achieving the objectives of the plans or projects that avoid adverse impacts on the integrity of the Natura 2000 site; and
- Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain: an assessment of whether the development is necessary for imperative reasons of overriding public interest (IROPI) and, if so, of the compensatory measures needed to maintain the overall coherence of the Natura 2000 network.

2.2 IIA Methodology

2.2.1 IIA is an iterative process of gathering data and evidence, assessment of environmental effects, developing mitigation measures and making recommendations to refine plans or programmes in view of the predicted environmental effects.

2.2.2 The key stages of the IIA process are the following:

- **Stage A:** Production of a scoping report which sets the context of the local plan, identified other relevant policies, plans and programmes, baseline information and sustainability objectives. This was undertaken by RBKT in 2017.
- **Stage B (this stage):** Assessment of draft policies and alternative policies and strategic and alternative sites and the preparation of the IIA Report. HIA and EqIA assessments are undertaken at the same time and the findings incorporated into the IIA Report. The report is then consulted on alongside the draft Local Plan (also referred to as Regulation 18 consultation);
- **Stage C:** Assessment of preferred policies and sites and the preparation the IIA Report. HIA and EqIA assessments are undertaken at the same time and the findings incorporated into the IIA Report;
- **Stage D:** Consultation on the preferred Local Plan and the IIA Report (also referred to as Regulation 19 consultation). The Local Plan and IIA then undergo independent examination; and
- **Stage E:** Monitoring the significant effects of implementing the Local Plan.

2.2.3 Full details on the methodology can be found in **Section 3** of the IIA Report.

2.3 Identification of Sustainability Issues and Opportunities and the IIA Framework

2.3.1 In 2017, RBKT completed the IIA Scoping Report, which outlined key baseline information, identified key sustainability issues in the Borough and identified future trends which could occur without implementation of the Local Plan.



- 2.3.2 Following the findings identified at scoping, and updates based on changes in legislation and best practice guidance, an IIA Appraisal Framework has been produced, which was used to guide the assessment process of the plans and strategies.
- 2.3.3 This Appraisal Framework has guided the IIA assessment of the Local Plan and is shown in **Table 3-1** below.

Table 2-1 - IIA Appraisal Framework

IIA Objective
1. To protect and enhance biodiversity and valuable ecological networks that contribute to ecosystem functionality in the borough, contributing to biodiversity net gain.
2. To reduce greenhouse gas emissions, encourage energy efficiency and promote sustainable use of resources.
3. Ensure that the Borough is resilient to the effects of climate change.
4. To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.
5. Protect and enhance the character and quality of the Borough's landscapes and townscapes.
6. To protect and enhance air quality.
7. To ensure the efficient use of land.
8. To maintain and enhance water quality.
9. Cater for existing and future residents' needs as well as the needs of different groups in the community.
10. To build inclusive communities by reducing social exclusion, promoting equity and equality and respecting diversity.
11. Improve the health and wellbeing of the Borough's residents.
12. Promote sustainable transport use and reduce the need to travel.
13. Support a strong, diverse, and resilient economy that provides opportunities for all.
14. To reduce crime and anti-social behaviour and the fear of crime.
15. To meet the housing needs of all the Borough's residents inclusively.

3 IIA Assessment Findings

3.1 Assessment of Policies

- 3.1.1 The assessment of the Local Plan policies was carried out in relation to the IIA Objectives. A summary of the findings is detailed in **Table 3-1** and **Table 3-2** below.
- 3.1.2 It should be noted that the assessment of policies within themes and sub-themes have been standalone assessments, which purely assess the outcome of the application of those policies rather than their relationship with other policies within the Local Plan.
- 3.1.3 Further details on the assessment of the Local Plan policies can be found within **Section 5.4** of the main IIA Report and **Appendix C** to the main IIA Report.

Table 3-1 - Overall impact of all Local Plan policies against IIA Objectives

Effect	Nature of Effect	Number of Effects
++	Significant Positive	181
?	Uncertain	48
--	Significant Negative	1

Table 3-2 – Summary of Significant Effects – Policy Assessment

Significance	Summary of Effects
<p>Significant Positive (++)</p>	<ul style="list-style-type: none"> • Policies that could result in an increase in green infrastructure or biodiversity net gain and natural habitats for biodiversity (IIA1). • Policies that encourage net zero developments and could result in reductions in emissions and improve energy efficiency for IIA2 (GHGs and energy efficiency). • Policies that could reduce overheating, improving climate resilience (IIA3). • Policies that could protect and improve assets and their setting for historic environment (IIA4). • Policies that could improve the public realm, the visual and natural landscape, improving landscape (IIA5). • Policies that could result in reductions in air pollutants, improving air quality (IIA6). • Policies that could protect greenbelt land and promote the use of brownfield land, for efficient use of land (IIA7). • Policies that could result in an increase in blue infrastructure or reduce the levels of pollutants within the Borough’s rivers, improving water quality (IIA8). • Policies that could improve access to facilities, meeting community needs (IIA9). • Policies that could improve access and cultural diversity for inclusivity and equality (IIA10). • Policies that could increase physical activity, healthy lifestyles or mental wellbeing, improving health (IIA11). • Policies that could encourage public transport, active travel modes or reduce private car use, for sustainable transport (IIA12). • Policies that could increase employment opportunities, diversify the economy and encourage investment, improving the economy and employment (IIA13). • Policies that could improve reduce crime rates for crime and safety (IIA14). • Policies that could increase the Borough’s housing provision, contributing to improved housing (IIA15).

Significance	Summary of Effects
Uncertain (?)	<ul style="list-style-type: none"> • Policies where development locations are unclear and could result in a decrease or increase in biodiversity and natural capital (IIA1). • Policies where development could result in increased disturbance upon biodiversity (IIA1). • Policies where design and use of developments influences levels of GHGs and energy efficiency (IIA2). • Policies where the location of developments and the level of resilience are determined at scheme level for climate resilience (IIA3). • Policies where the enhancements or negative effects will be determined by scheme level design and location close to heritage assets (IIA4). • Policies where visual, setting impacts or disturbance will largely be determined by individual scheme location and design for landscape (IIA5). • Policies where urban intensification could result in increased vehicular emissions, reducing air quality (IIA6). • Policies where the location of proposed developments may result in use of greenbelt land but is currently uncertain (IIA7). • Policies where the nature of public transport improvements are currently uncertain (IIA12). • Policies where the nature of proposed schemes is unclear for housing (IIA15). • Policies where reductions in crime will largely be determined by scheme level design (IIA14).
Significant Negative (- -)	<ul style="list-style-type: none"> • Policies that could result in increased disturbance and pollution within the Thames and cause a decrease in water quality (IIA8).

3.2 Assessment of Policy Alternatives

- 3.2.1 The development of the Local Plan policies has not at this stage identified any key policy alternatives, so the assessment of policy alternatives has assessed two scenarios – the continuation of the existing Core Strategy and the application of just the London Plan.
- 3.2.2 The assessment of both scenarios identified a number of significant positive effects, as the application of many policies remain relevant and will likely still offer protection for a number of IIA objectives.
- 3.2.3 The existing Core Strategy has performed marginally better than the London Plan, this is generally because the London Plan is strategic in nature and lacks specific local details. The Core Strategy is the source of the one significant negative effect due to failing to meet housing targets.
- 3.2.4 A number of uncertain effects have also been identified. There are some areas where both the Core Strategy and the London Plan are working towards outdated targets, such as housing (Core Strategy), net zero ambitions (London Plan) and biodiversity net gain (Core Strategy). Both fail to tackle to challenges that remain since Covid-19.
- 3.2.5 Further details on the assessment findings can be found in **Section 8** of the main **IIA Report**.

3.3 Assessment of Site Allocations

3.3.1 The assessment of proposed site allocations was carried out in relation to the IIA Objectives. A summary of the findings is detailed in **Table 3-3** and **Table 3-4** below.

Table 3-3 - Overall impact of all Local Plan site allocations against IIA Objectives

Effect	Nature of Effect	Number of Effects
++	Significant Positive	104
?	Uncertain	63
--	Significant Negative	6

Table 3-4 - Summary of Significant Effects – Site Allocations Assessment

Significance	Summary of Effects
Significant Positive (++)	<ul style="list-style-type: none"> • Sites which have limited ecological value and development is likely to increase biodiversity in the local area (IIA1). • Sites which reduce levels of embodied carbon and reduce GHGs from the road network (IIA2). • Sites that mitigate climate risks or include low carbon measures (IIA3). • Sites where development reflects local character and history, mitigating construction impacts (IIA4). • Sites where construction effects are mitigated and local character and active high streets are preserved (IIA5). • Sites that support the use of brownfield land, and high density developments (IIA7). • Sites that improve provision of community facilities within the development (IIA9) (IIA10) (IIA11). • Sites that are well connected to public and active travel modes (IIA12). • Sites that provide commercial and employment floorspace (IIA13). • Sites that work towards meeting the Borough’s housing target (IIA15).

Significance	Summary of Effects
Uncertain (?)	<ul style="list-style-type: none"> • Sites where green infrastructure and biodiversity net gain are unclear (IIA1) (IIA5). • Sites where scheme level information is currently unknown (IIA2) (IIA3). • Sites where loss of assets and mitigation against effects is unknown (IIA4). • Sites where the level of transport connectivity is unclear (IIA6). • Sites where there are high population densities, close to existing facilities, but it is uncertain if the current provision is adequate (IIA9). • Sites that could result in the loss of NHS services (IIA11). • Sites that may result in a change in bus services (IIA12). • Sites that may result in the relocation of current employment sites (IIA13).
Significant Negative (- -)	<ul style="list-style-type: none"> • Sites that have a high risk of surface water flooding but there is no proposed mitigation (IIA3). • Sites where there is potential for disturbance to the historic environment and insensitive design (IIA4).

3.4 Assessment of Site Alternatives

Table 3-5 - Overall impact of all Local Plan site alternatives against IIA Objectives

Effect	Nature of Effect	Number of Effects
++	Significant Positive	11
?	Uncertain	96
--	Significant Negative	55

- 3.4.1 The assessment of alternative sites has resulted in a higher number of significant negative effects compared to the proposed site allocations. These have generally been identified for biodiversity, landscape and townscape and efficient use of land as many sites will result in the direct loss of greenbelt and MOL, as well as habitats (some priority habitats) and species which reside within them.
- 3.4.2 A number of sites are located on Locally Significant Industrial Sites (LSIS) which has resulted in significant negative effects on economy and employment. Development here is likely to result in loss of valuable employment land as well as jobs.
- 3.4.3 A number of sites have also been identified as having significant negative effects for climate resilience as the site is proposed within flood zone 3, which has a high potential for flooding. At this stage, incorporation of flood prevention measures is not known.
- 3.4.4 Uncertain effects have been identified for GHGs and energy efficiency as it is currently unclear if sites will include energy efficiency measures. Additionally, there are likely to be construction related emissions and embodied carbon associated with development. Similar uncertain effects have generally been identified for climate resilience as it is currently unclear if the new site will include energy efficiency measures and resilience measures for overheating and flooding.
- 3.4.5 A number of uncertain effects have been identified for community needs, inclusion and equality and health and wellbeing as it is not clear on the provision for services the new site may provide. Where sites have scored negatively has generally been due to poor access to existing services and poor transport links.

3.5 Findings from other IIA Assessments

EqlA

3.5.1 Overall, the policies will likely result in positive effects on protected characteristic group members in the borough. The main protected characteristic groups that will particularly benefit include:

- **Age** – Particularly people who have reduced mobility and require access to health and other services. Children are also likely to benefit from air quality improvements that numerous policies look to achieve.
- **Disability** – Particularly people with a variety of disabilities will benefit from a more accessible environment. The Local Plan includes policies which support inclusive design which will help to improve connectivity and function, benefiting users with mobility limitations.
- **Deprivation** – Policies are likely to benefit people from low-incomes who require access to employment, education and housing and people with underlying health issues. Housing policies in particular have had had positive effects as they will help to improve deprivation in the area by ensuring that housing needs are met, benefiting first time buyers, and those looking to move out of supported, familial or shared housing.

3.5.2 Further details on the EqlA can be found in **Appendix E**.

HIA

3.5.3 The HIA assessed the Local Plan policies and considered their impact on the key determinants of health. These have been detailed below:

- **Air Quality:** Positive effects associated with Sustainable Development, Climate Change and Environmental Sustainability, Social Infrastructure, and Natural Environment and Green Infrastructure policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification and additional housing could result in a higher number of cars on the city's roads, worsening air quality.
- **Noise:** Mixed effects have been identified. The increase in housing could result in increased cars, contributing to increased road traffic noise. Additionally, construction related noise from developments may negatively impact upon the tranquillity of the Borough. However, the Local Plan will aid in reducing noise and vibration as a result of construction and developments throughout the borough.
- **Housing and Homelessness:** Positive effects have been identified as housing policies will ensure that housing will be delivered and help more people secure housing.

- **Economy and employment:** Positive effects have been identified. Policies will encourage business investment and improve the economy of the borough. Additional town centre developments and an increase in shops is also likely to reduce unemployment in the borough.
- **Skills and education:** Positive health effects have been identified as social Infrastructure policies may improve education opportunities.
- **Social cohesion and community safety:** Positive health effects have been identified. Improvements to community housing and living conditions are likely to improve social cohesion and community safety through improving the living standards and safety of community housing and residential areas.
- **Access to services:** Positive health effects have been identified. It is assumed that new community housing developments within the borough will have suitable access to community facilities and shops. Social infrastructure policies include the preservation and enhancement of recreation facilities, parks, and other facilities used as social hubs. The development of such areas may improve social cohesion and encourage those who are socially isolated to utilise facilities.
- **Physical activity:** Positive health effects have been identified. The policies proposed within social infrastructure focus on improving and preserving access to services (including sports and recreation) to all communities, encouraging physical activity and healthy lifestyles.
- **Green Infrastructure:** Positive effects have been identified as a number of policies outline the requirements to create green infrastructure. This will enhance public health and promote social wellbeing through increasing the number of green spaces within RBKT.
- **Climate change resilience:** The policies proposed within Climate Change and Environmental Sustainability specifically, will attempt to limit the flood risk impacts of developments, minimise the urban heat island effect and minimise greenhouse gas emissions, therefore improving the resilience of all new developments within the borough.

3.6 HRA

- 3.6.1 There are no Habitats sites within RBKT's administrative area, however there are a number that fall within 10km of the proposed sites allocations and as such there will be implications for some of these habitats sites from the policies of the Local Plan.
- 3.6.2 Three policies were screened-in (KH1 – Meeting the Borough's Housing Needs, KN2 Open Spaces and KS3 School, College and University Facilities) for further consideration at Stage 2 Appropriate Assessment. These policies have potential for Likely Significant Effects (LSE) on nearby Habitats sites relating to increased traffic (and therefore impacts on air quality) and increased recreational and development pressures.
- 3.6.3 Given the possibility of LSE associated with the screened-in interventions, further, detailed assessment is considered necessary to satisfy the requirements of the Habitats Regulations.
- 3.6.4 It is also not possible to rule out in-combination LSE on Habitats sites as a result of policies in the emerging RBKT Local Plan when considered with other strategic plans.

4 Cumulative Effects

- 4.1.1 A cumulative effects assessment was undertaken for the IIA. This looked at two different types of cumulative effects – Intra-project and Inter-project. These are defined as follows:
- Consideration of how different proposed policies and sites within the RBKT may interact and cause cumulative effects on a receptor (Intra-project effects); and
 - How the proposed policies and sites within the RBKT could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-Projects Effects)

4.2 Intra Project Effects

- 4.2.1 The proposed policies and sites within the Local Plan resulted in the following intra-project cumulative effects. Further details on the assessment of the inter-project cumulative effects can be found within **Section 10.2** of the main **IIA Report**.
- 4.2.2 Positive effects have largely been identified for IIA objectives where policies contribute to improving the current status of the Borough, for example, improving biodiversity enhancements, improving energy efficiency or providing additional community infrastructure. Positive effects were identified for biodiversity, GHGs, energy efficiency and sustainable resources, climate resilience, historic environment, landscape and townscape, air quality, efficient use of land, water quality, community needs, inclusivity and equality, health and wellbeing, sustainable transport, economy and employment, crime and safety, and housing.
- 4.2.3 Negative effects have been identified for biodiversity and historic environment as a result of site allocations and housing delivery. There is the potential that multiple housing developments in close proximity to the historic environment may disturb heritage assets and conservation areas during construction. Additionally, the loss of land required for sites and housing allocation may segregate and damage habitats, resulting in a loss of habitats.
- 4.2.4 Mixed positive and negative effects were identified for health and wellbeing, community needs, water quality, efficient use of land, air quality, landscape and townscape, historic environment, climate resilience, GHGs, energy efficiency and sustainable resources, and biodiversity.

4.3 Inter Project Effects

- 4.3.1 An assessment of the potential cumulative effects of the Local Plan in association with other plans, policies and projects in the surrounding area was completed, looking at the potential impacts at a strategic level. Further details on the assessment of the inter-project cumulative effects can be found within **Section 10.3** of the main **IIA Report**.
- 4.3.2 The following plans were considered:
- The London Plan, 2021;
 - Crossrail 2;
 - Mayor of London, Mayor's Transport Strategy, 2018;
 - Transport for the South East (TfSE) Regional Transport Strategy, 2020;
 - Neighbouring Local Plans (detailed within **Section 10.3** of the main **IIA Report**); and
 - Neighbouring Local Transport Plans, Strategies and Implementation plans (detailed within **Section 10.3** of the main **IIA Report**).
- 4.3.3 Potential positive effects were identified for climate resilience, air quality, community needs, inclusivity and equality, health and wellbeing, sustainable transport, economy and employment, crime and safety, and housing. Potential negative effects were identified for historic environment and landscape and townscape.
- 4.3.4 Potential mixed positive and negative effects were identified for biodiversity, GHGs, energy efficiency and sustainable resources, historic environment, landscape and townscape, air quality, efficient use of land, water quality, community needs, and health and wellbeing.

5 Mitigation, Monitoring and Recommendations

5.1 Mitigation and Enhancement Measures

- 5.1.1 Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of IIA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan.
- 5.1.2 Proposed mitigation and enhancement measures have been set out in Table 5.1 below.

Table 5-1 – Mitigation and Enhancement Measures

IIA Objective	Mitigation/Enhancement
IIA1 – Biodiversity	Consideration needs to be given to the potential effects of construction of developments (noise, vibration and air pollution) on international, national and locally designated sites of importance for biodiversity.
IIA2 - GHGs & Energy Efficiency IIA3 – Climate Change	Development should ensure design that is resilient to the current and future risks of climate change i.e. extreme heat, cold and precipitation. This could include the use of locally available, renewable, or reclaimed resources, as these are often more resilient. New developments should incorporate renewable energy generation methods, such as solar panels, to reduce the carbon emissions of the site.
IIA3 – Climate Change	Sequential testing should be undertaken, to avoid sites with the highest flood risk. Where this isn't viable and proposed sites are located within flood zones 2 or 3 a full flood risk assessment should be undertaken. Scheme level design should also consider the incorporation features to reduce flood risks, both now and in future, in light of future precipitation changes associated with climate change. This could include features such as sustainable urban drainage solutions (SuDs), permeable paving and natural engineering such as tree planting.

IIA Objective	Mitigation/Enhancement
IIA3 – Climate Change IIA2 - GHGs & Energy Efficiency	<p>Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy, CEEQUAL and BREEAM.</p> <p>Sustainable design and construction techniques should be promoted, such as low energy lighting and opportunities for renewable energy regeneration.</p>
IIA4 – Historic Environment IIA5 – Landscape and Townscape	<p>New developments should seek to maximise sustainability benefits from existing landscape, townscape and heritage assets by valuing them inherently and for the wider services they provide.</p> <p>Promoters and designers should liaise closely with RBKT and Historic England to avoid or minimise negative effects, such as land take and light pollution, whilst seeking to maximise benefits, such as tranquillity.</p> <p>Where developments are being built and/or improved within, or 500m outside of a designated historic assets, visual effects assessment should be undertaken to determine magnitude of impact and possible mitigation.</p>
IIA9 – Community Needs IIA10 – Inclusivity and Equality IIA11 – Health and Wellbeing	<p>Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities.</p>
IIA9 – Community Needs IIA10 – Inclusivity and Equality IIA11 – Health and Wellbeing	<p>Community safety, health and equalities should be considered in design, for example, pedestrian networks, including linking new developments into existing infrastructure, lighting and other safety design considerations, materials used (contrasting colours, non-slip surfaces), accessibility for all including those with reduced mobility or disability, well-being, affordability of schemes, active travel.</p>

IIA Objective	Mitigation/Enhancement
<p>IIA9 – Community Needs</p> <p>IIA10 – Inclusivity and Equality</p> <p>IIA11 – Health and Wellbeing</p> <p>IIA14 – Crime and Safety</p>	<p>Where policies and site allocations make provision for open spaces and public realm improvements, there is a need for these spaces to be well designed and well lit, to ensure that they are safe and feel safe for all users, particularly after dark.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p> <p>Accessible surfacing should be considered for wheelchair users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p>
<p>IIA10 – Inclusivity and Equality</p>	<p>Inclusive mobility guidance should be adhered to ensure designs are accessible for everyone.</p>
<p>IIA10 – Inclusivity and Equality</p> <p>IIA12 – Sustainable Travel</p>	<p>Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people and low income groups, such as affordability. RBKT should work with charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p> <p>The Local Plan should also support community engagement with various groups prior the development of transport infrastructure.</p>
<p>IIA10 – Inclusivity and Equality</p> <p>IIA13 - Employment</p>	<p>Employment should be focused on local residents in the first instance. Policies should aim to increase employment for all protected groups where barriers to employment and education exist (low-incomes, younger people, disabled).</p>
<p>IIA12 – Sustainable Travel</p>	<p>Of the proposed sites, three (SA19, SA22 and SA26) have existing low levels of access to public transport. Opportunities must be taken within the planning process to limit car parking and make cycling, walking and public transport the modes of choice. These modes should be made more convenient than car usage, in order to promote genuine modal shift.</p>

IIA Objective	Mitigation/Enhancement
IIA13 - Employment	Where new development comes forward in close proximity to existing shop frontages and businesses, there's a need to ensure that they can remain open and maintain their existing business hours.
IIA14 – Crime and Safety	<p>Development should incorporate designing out crime principles, particularly for those potential development sites located in areas with high levels of crime deprivation.</p> <p>Although crime is incorporated within the Local Plan, it currently doesn't currently have its own standalone policy. Given the high levels of crime in some areas of the Borough, reductions in crime could be better supported by planning policies.</p>

5.2 Monitoring

- 5.2.1 The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the IIA, and to deal with any unforeseen problems.
- 5.2.2 Despite mitigation measures some residual uncertain and significant negative effects have remained which may require monitoring. These are as follows:
- **IIA1:** Uncertain effects regarding the number of new developments achieving biodiversity net gain;
 - **IIA1:** Potential negative effects from the loss of Sites of Importance for Nature Conservation from proposed developments;
 - **IIA2:** Uncertain effects regarding energy reductions on new developments;
 - **IIA3:** The potential number of potential developments located in Flood Zone 3;
 - **IIA4:** Potential negative effects from new developments on heritage assets; and
 - **IIA12:** Potential negative effects from poor access to sustainable transport modes at a number of proposed developments
- 5.2.3 The draft Local Plan sets out a proposed monitoring framework, which includes a number of indicators. The Council's progress towards these indicators and targets will be published annually in the Authority's Monitoring Report
- 5.2.4 **Table 5-2** below sets out those monitoring measures which would be suitable in monitoring those uncertain residual effects outlined above.

Table 5-2 – Potential Monitoring Measures

Potential Effects	Key Performance Indicators	Targets
IIA1: The number of new developments achieving biodiversity net gain	Biodiversity Net Gain from developments (measured using the Biodiversity Metric or Small Sites Metric for small development sites)	For all relevant developments to deliver a minimum of 20% Biodiversity Net Gain
IIA1: Potential negative effects from the loss of Sites of Importance for Nature Conservation from proposed developments	Planning permissions involving priority habitats or SINC	No net loss in priority habitats and SINC
IIA2: Uncertain effects regarding energy reductions on new developments	Number of developments supported by an Energy Statement / Strategy; level of on-site carbon reduction	For all relevant developments to achieve net zero carbon with a minimum of 35% on site carbon reduction beyond Building Regulations
IIA3: The number of potential developments located in Flood Zone 3	Number of developments supported by a flood risk assessment	For all relevant developments to incorporate suitable flood resilience and mitigation measures
IIA4: Potential negative effects from new developments on heritage assets	Increase in the number of Conservation Areas Increase in amount of land covered by Conservation Areas	Designate new Conservation Areas where a need to do so has been identified through relevant studies. Extend boundaries of existing Conservation Areas where a need to do so has been identified through relevant studies.
IIA12: Poor access to sustainable transport modes at a number of proposed developments	PTAL levels Monitor the amount of car free development and the amount of new development which exceeds the maximum car parking standards.	Improve PTAL levels across the borough No new development which exceeds the maximum car parking spaces set by the car parking standards.

6 Next Steps

- 6.1.1 RBKT is seeking the views of statutory bodies, the public and other stakeholders on the results of the IIA. Consultation at this stage continues to ensure that the IIA provides a robust assessment of the Local Plan.
- 6.1.2 This IIA Interim Report will be issued to consultees for a 12-week consultation period alongside the draft Local Plan (Regulation 18 Consultation) from 28th November 2022 – 28th February 2023.
- 6.1.3 An indicative timetable of the remaining stages of the IIA and Local Plan have been included in **Table 7-1** below.

Table 6-1 - Indicative Local Plan IIA Timetable

IIA/ Local Plan Stages	Timescales
Regulation 18 consultation	28 th November 2022 – 28 th February 2023
SA Report (IIA Stage C)	Spring 2023
Regulation 19 Consultation (IIA Stage D)	Summer 2023
Examination (IIA Stage D)	Autumn 2023
IIA Post Adoption Statement (Stage E)	Winter 2024



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