

Report



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**Report for – London Borough of Croydon
Local Implementation Plan 3 2019
Strategic Environmental Assessment,
Post-Adoption Statement**



Document version control

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Report for: **London Borough of Croydon**

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1.0 Introduction

1.1 Purpose of the SEA Post-Adoption Statement

This post-adoption statement sets out how the Strategic Environmental Assessment (SEA) process, the impacts and suggested mitigation or enhancement and the views of stakeholders have been considered in the adopted Croydon's third Local Implementation Plan (LIP3) for the borough. LIP3 sets out our priorities and proposals to support and implement the Mayor of London's Transport Strategy (MTS). The statement also outlines the measures for monitoring the environmental effects associated with the implementation of the plan.

1.2 London Borough of Croydon's Local Implementation Plan.

The Croydon's LIP3 was adopted by the Council on 26 February 2019 by the decision of the Executive Director. It was subsequently approved by the Mayor of London and the Deputy Mayor for Transport in April 2019, and the Council commenced delivery of the LIP3.

Copies of the LIP3, as adopted, its accompanying Environmental Report, and this Statement may be viewed or and downloaded from the Council's website: www.croydon.gov.uk.

Alternatively, the plan and accompanying documents may be obtained from:

London Borough of Croydon, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 or calling: 020 8726 6000.

2.0 The Strategic Environmental Assessment

2.1 Integrating environmental considerations into the Plan

The LIP3 was subject to a process of environmental assessment in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations (2004), known as the 'SEA Regulations'. The process of environmental assessment requires identification of the significant effects of a plan or programme on the environment against a baseline situation. These effects were identified in the Environmental Report prepared for the London Borough of Croydon (LB Croydon) and available on the Council's website as identified in Section 1.2 above.

The environmental effects of the draft Croydon's LIP3 were identified and analysed through use of the TfL/ GLA framework which was developed to satisfy SEA requirements for plans and strategies produced by the Mayor of London. This framework sets out objectives against 11 topics and was used to assess the LIP3's objectives.

The SEA concluded that no significant adverse environmental effects will result from the implementation of the LIP3 in Croydon. As such, no specific recommendations for the mitigation of effects were required. All the effects identified were either considered to have no impact or will be positive. In a few cases, the LIP3 may have positive or negative effects but the level of information available at a time of assessment did not allow a clear judgement to be made.

The assessment did identify where positive effects can be strengthened for some of the objectives and these were described in the Environmental Report.

It can be considered that it is not surprising or unusual that there was a lack of adverse environmental effects identified in the SEA of the LIP3; this could be expected given that the Local Implementation Plans (LIPs) prepared by the boroughs are the local-level means for implementing the Mayor's Transport Strategy (MTS) and the MTS was subject to a comprehensive Integrated Impact Assessment (IIA)¹. The IIA considered a range of alternatives and interventions at a strategic level and enhanced the sustainability of the MTS policies. Therefore, as the LIP3 needs to align with the MTS it would be expected to reflect these positive outcomes.

2.2 Taking account of the Environmental Report

The SEA process was the means by which the drafting and detail of the LIP3 could be influenced in terms of environmental considerations. The Environmental Report was published by the LB Croydon and was available for public comment during the consultation (see below). Section 5 of the report set out the assessment of the draft LIP3 using the TfL / GLA framework referred to above.

The Consultation Report on the draft LIP3 set out the consultation comments received, the Council's response to these and identified some minor changes planned to be made to the final LIP3. The report did not identify any specific comments or changes about environmental effects or enhancement.

Although these changes have not been assessed for their environmental effects, it is considered that they are likely to be positive overall.

¹ See IIA documents available here: <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports#mtsevidence>

As the SEA identified that the environmental effects of the draft LIP3 would either have no impact or be positive, and as no negative effects were identified, then no specific changes were required to address these. The proposals for enhancement of the environmental effects sought to ensure that the existing proposals in the LIP3 would be further enhanced where possible.

2.3 Taking Account of Stakeholder opinions

2.3.1 Statutory Consultees

The Scoping Report for the SEA² was forwarded to the statutory consultation bodies (Environment Agency, Natural England and Historic England) by the LB Croydon in November 2018. The Environmental Report took account of the comments received from these bodies on the Scoping Report where provided. This included consideration of and reference to spatial non-strategic planning documents such as the series of Croydon Town Centre Masterplans which provide a vision for central Croydon and consideration of the conservation area appraisals and management plans. Natural England responded to the consultation indicating it had no comments to make. The Environment Agency (EA) responded to the consultation indicating that it was not possible to provide bespoke comments to each local authority and that instead a generic checklist of issues was provided identifying those issues which the EA wished to see in local transport plans and their SEAs. This checklist was referred to in the preparation of the Environmental Report.

2.3.2 Other consultees

The Environmental Report was published for consultation with the public and other interested parties and organisations alongside the draft LIP3 and additional documents as identified above. The consultation ran for a six-week period from 7th December to 20th January 2018.

No specific comments were received on the Environmental Report. A consultation report on the LIP3 documenting the comments received and the Council's response was prepared by the LB Croydon .

2.3.3 Transboundary consultations

No transboundary consultations as described under Regulation 14(4) were undertaken.

² Temple and Steer (2018) - **Local Implementation Plan: Strategic Environmental Assessment Scoping Report** – London Borough of Camden, November 2018.

3.0 Alternatives

To meet the requirements of the SEA Regulations, it was necessary to identify “reasonable alternatives” to the proposals presented in the Plan, and meaningful comparisons made of the environmental implications of each. A range of strategic level options and alternatives were considered through the IIA of the MTS, which compared a “do minimum” alternative (Option 1), with one that provided an “additional package of enhanced public transport investment” (Option 2), and another that provided this as well as “additional levers to maximise mode shift to sustainable modes” (Option 3).

The results of the assessment of these options indicated that Option 3 offered the most sustainability benefits across the six elements of the IIA assessment (Equality Impact Assessment (EqIA), Assessment of Economic Impact (AEI), Strategic Environmental Assessment (SEA), Community Safety Impact Assessment (CSIA), Habitat Regulations Assessment (HRA) and Health Impact Assessment (HIA). Option 3, therefore, became the Preferred Option that was subsequently developed into the Draft MTS 3, which incorporated appropriate mitigation measures to address potential impacts on the natural environment and the community, in particular noise, air quality, climate resilience and accessibility.

Therefore, as the key alternatives had already been assessed and the most sustainable one selected, in for the LIP3, it was considered that the only alternative to the proposals would be the “do-nothing” scenario. It was deemed inappropriate to develop other alternatives simply for comparison in the SEA.

This approach was outlined in the Scoping Report for the SEA that was sent to the Statutory Environmental Bodies as the basis of consultation on the Plan. No comments or objections were received in respect of this.

4.0 Monitoring significant environmental effects

Whilst the LIP3 do not include separate proposals for environmental monitoring of the effects identified in the SEA, monitoring of many existing targets will provide relevant insights. This includes monitoring of the MTS indicators and targets – such as those for air quality – together with local monitoring of LB Croydon specific targets, including the percentage of trips made by active travel modes, traffic flow data and levels of car ownership.

Considering the amount of existing strategic and local monitoring in place, further additional targets and indicators are not proposed as a result of the SEA.

