Bromley Borough's Third Local Implementation Plan

Strategic Environmental Assessment (SEA)

Environmental Report Non-Technical Summary

Bromley Council

November 2018

Quality information

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Revision History

Revision	Revision date	Details	Name	Position
v1	01 November 2018	Draft for internal review	Alastair Peattie	Associate Director
v2	02 November 2018	Draft for client review	Nick Chisholm-Batten	Associate Director

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1. Introduction

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) of Bromley Borough's Third Local Implementation Plan (LIP3).

SEA is a mechanism for considering and communicating the environmental impacts of an emerging plan or strategy and potential alternatives. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts as well as maximising opportunities for positive effects. Through this approach, the SEA seeks to maximise the environmental performance of the LIP3.

The Environmental Report is published alongside the Draft LIP3 for consultation. This report is the Non-Technical Summary (NTS) of the Environmental Report.

Structure of the Environmental Report / this NTS

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?

    ▪ Including in relation to 'reasonable alternatives'.

2. What are the SEA findings at this stage?

    ▪ i.e. in relation to the draft plan

3. What happens next?

    ▪ What steps will be taken to finalise (and monitor) the Strategy?

Each of these questions is answered in turn below. Before answering the first question however, two initial questions are answered in order to further 'set the scene' – i) what is the plan trying to achieve?; and ii) what is the scope of the SEA?

What is the LIP3 trying to achieve?

Under the Transport Act 2000, as amended by the Local Transport Act 2008, local authorities in England are required to produce a Local Transport Plan (LTP). The 2008 Act requires that LTPs contain policies and implementation plans. In this context, the current Mayor's Transport Strategy is the overarching LTP for London and was adopted in 2018 to cover the period up to 2041.

The LIP is a statutory document, required by the Greater London Authority Act 1999, and sets out how the Mayor's Transport Strategy (MTS) will be implemented within the borough. The plan will detail how the transport related targets set by the Mayor of London will be addressed.

The Draft LIP3 initially sets out borough-level objectives in line with each of the nine MTS outcomes identified earlier in this Chapter. Following that, it sets out a delivery plan for achieving those borough objectives, this includes:

- Linkages to Mayor's Transport Strategy priorities;

- A list of potential funding sources for the period 2019/20 to 2021/22;

- Long-term interventions;

- Three year indicative Programme of Investment for period 2019/20 to 2021/22; and

- A detailed annual programme for 2019/20.

The Draft LIP3 also outlines how the Council will work with TfL and other stakeholders such as Network Rail, to assist with delivering the outcomes, polices and proposals of the MTS in a locally appropriate way that supports the quality of life, health and economy of the borough.

What is the scope of the SEA?

The scope of the SEA is the sustainability issues and objectives that should be a focus of (and provide a broad methodological framework for) the SEA. The SEA Regulations require that 'when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.[1]

As such, these authorities were consulted on the SEA scope for 5 weeks from 17th September to 23rd October 2018. No response was received from the Environment Agency and while a response from Natural England was received no specific comments were made. The response from Historic England stated that the SEA Scoping Report (2018) sets out a proportional overview of heritage assets. Historic England recommended that reference is made to the 27 Archaeological Priority Areas within the borough as well as the inclusion of text relating to non-designated heritage assets and their significance. These recommendations have been taken forward and the scoping information updated in **Appendix I** of this Environmental Report

The SEA themes, key sustainability issues, SEA objectives and assessment questions identified through scoping are presented in **Table NTS1** below.

Table NTS1: SEA themes, key issues and SEA objectives

Key issues	SEA objective	Assessment questions – will the option/ proposal help to…..
Air Quality		
• There is one AQMA covering the north and north-west of the London borough of Bromley, which is currently exceeding nationally set objectives for concentrations of nitrogen dioxide emissions. • Cars and heavy goods vehicles (HGVs) are key contributors to nitrogen dioxide emissions in the Plan area. • Local Implementation Plan actions to address issues such as modal shift, reducing traffic volumes at 'pinch points' and freight movement within the borough will directly impact levels of NO_2 and as such the success of the AQAP.	Deliver improvements in air quality in the London borough of Bromley	• Reduce emissions of pollutants from transport? • Improve air quality within the designated AQMA? • Promote the use of low emission vehicles? • Promote enhancements in sustainable modes of transport, including walking, cycling and public transport? • Support enhancements to green infrastructure networks?
Biodiversity and Geodiversity		
• There are no European sites designated for biodiversity within or immediately adjacent to the London borough of Bromley. • Six Sites of Special Scientific Interest (SSSI)s lie within the borough of Bromley: Elmstead Pit SSSI, Ruxley Gravel Pits SSSI, Crofton Woods SSSI, Keston and Hayes Commons SSSI, Downe Bank and High Elms SSSI and Saltbox Hill SSSI. • There are five Local Nature Reserves (LNRs) within Bromley, as well as 87 rare and threatened species.	Support the integrity of nationally and locally designated sites	• Protect the integrity of the five nationally designated SSSIs in Bromley? • Manage pressures on locally designated and regionally important sites for biodiversity and geodiversity in Bromley?
	Protect and enhance habitats and species in Bromley	• Protect and enhance semi-natural habitats? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Increase the resilience of Bromley's biodiversity to the

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[1] In accordance with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

Key issues	SEA objective	Assessment questions – will the option/ proposal help to…..
		potential effects of climate change?
	Minimise the potential for negative cumulative and synergistic effects resulting from the in-combination effects of Implementation Plan proposals and new development areas in Bromley	• Limit the effects of new transport infrastructure on biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?

Climate Change

• Bromley has recorded consistently lower greenhouse gas emissions per capita than both the South East and England since 2005. In addition, Bromley's average reduction in transport emissions per capita between 2005 and 2012 is greater than its regional and national counterparts. • A range of flood risk issues exist across Bromley, including linked to fluvial, surface water, and groundwater flooding. • The transport network has the potential to become increasingly vulnerable to the potential effects of climate change in forthcoming years. As such the resilience of the transport network to the likely impacts of climate change will be a key factor in its effective functioning.	Support climate change mitigation in Bromley through limiting the contribution of transport to greenhouse gas emissions in the county.	• Limit the increase in the carbon footprint resulting from new transport infrastructure provision? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Reduce the need to travel? • Reduce energy consumption from non-renewable resources? • Encourage the update of electric and alternatively fuelled vehicles?
	Support the resilience of Bromley's transport networks to the potential effects of climate change.	• Increase the resilience of the transport network to the potential effects of climate change? • Promote a coordinated approach to the management of flood risk across public infrastructure provision? • Improve and extend green infrastructure networks as part of transport infrastructure provision to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff? • Ensure the potential risks associated with climate change are considered through new transport network programmes? • Increase the resilience of biodiversity in Bromley to the effects of climate change, including enhancements to ecological networks (e.g. through the use of green bridges / tunnels)?

Historic Environment and Landscape

• There are a variety of heritage assets within Bromley including eight Grade I, 23 Grade II*, 376 Grade II listed buildings, six	Preserve and enhance Bromley's cultural heritage resource, including its	• Conserve and enhance the significance of buildings and structures of architectural or

Key issues	SEA objective	Assessment questions – will the option/ proposal help to…..
• historic parks and gardens and 45 conservation areas. • Bromley has been determined to be London's 'greenest' borough, encompassing 156 parks, 52 allotments and 21 outdoor facilities. • 51.47% of the borough's area is covered by the London Metropolitan Green Belt.	historic environment and archaeological assets.	historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of conservation areas and their settings? • Support access to, interpretation and understanding of the historic environment? • Conserve and enhance archaeological remains and support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?
	Protect and enhance the character and quality of Bromley's landscapes and townscapes.	• Support the management objectives of the greenspace and parks in Bromley? • Support the integrity of the LCAs within Bromley? • Conserve and enhance locally important landscape features within Bromley? • Improve accessibility to Bromley's landscape resources?
Land, Soil and Water Resources		
• New transport infrastructure has the potential to directly or indirectly lead to the loss of areas classified as the best and most versatile agricultural land in Bromley. • New transport infrastructure has the potential to modify water flow regimes and lead to effects on water quality. • Increased use of existing transport infrastructure, which may not be designed to current standards has the potential to lead to a deterioration of water quality in controlled waters. • The construction, maintenance and operation of transport infrastructure should seek to reduce the amount of primary materials required, make beneficial use of surplus materials and minimise the landfill disposal of waste generated throughout the asset's lifecycle.	Ensure the efficient and effective use of land.	• Facilitate the use of previously developed land? • Avoid the development of the best and most versatile agricultural land (Grade 1 to 3a agricultural land)?
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste during construction.	• Encourage recycling of materials and minimise consumption of resources during construction, operation and maintenance of new transport infrastructure? • Encourage the use of alternative transport methods for the movement of waste in the county?
	Manage Bromley's water resources in a sustainable manner.	• Support improvements to water quality? • Help to minimise diffuse surface water pollution? • Protect surface water and groundwater resources?
Communities		
• The population of Bromley increased by 4.7% between 2001 and 2011. Whilst this less than the trends for London, the South East of England and England, the population of the borough grew by	Promote sustainable transport use and reduce the need to travel.	• Encourage modal shift to more sustainable forms of travel? • Reduce the need to travel?
	Delivery of a transport infrastructure to meet the	• Improve accessibility to services, facilities and

Key issues	SEA objective	Assessment questions – will the option/ proposal help to…..
approximately 6% between 2011 and 2017. • Generally, there are a slightly higher proportion of residents within the working age categories (25-44 and 45-59) in Bromley (47.9%) in comparison to the totals for the South East of England (46.4%) and England (46.9%). However, this is lower than the proportion of residents within the work age categories in London (52.5%) • Bromley can be considered relatively affluent with the majority of resident's living in areas which are within the 40% least deprived areas in England • The most popular method of travelling to work in Bromley is via car or van, but a much larger proportion of residents get the train to work compared to London and regional and national averages.	foreseeable needs of the varied communities of Bromley.	amenities? • Meet the needs of a growing population? • Address the needs of all age groups? • Maintain or enhance the quality of life of residents?
	Support sustainable economic development in Bromley.	• Support sustainable economic development? • Improve accessibility to employment opportunities?
Health and Wellbeing		
Health levels are favourable compared to averages in London, the South East and England. 10% of residents in Bromley reported that their daily activities were limited in some way, which is 4.1% lower than the total for London, 5.7% lower than the total for the South East of England and 7.6% lower than the national average.	Improve the health and well-being of Bromley's residents.	• Reduce the impacts of air and noise pollution on health? • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Encourage healthy lifestyles and reduce health inequalities? • Enhance the provision of, and access to, green infrastructure in the county, in accordance with national standards? • Improve access to the countryside for recreation?
	Enhance road safety in Bromley	• Improve road safety and reduce road accidents?

Part 1: What has plan-making / SEA involved up to this point?

2. Reasonable alternatives for the SEA

The SEA Regulations require the Environmental Report to identify, describe and evaluate the likely significant effects on the environment of:

a) Implementing the plan or programme; and

b) Reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.

Taking account of the above, the development of alternatives for the LIP3 should therefore focus on the objectives of the Plan that seek to implement the MTS outcomes and priorities and in turn the costed Delivery Plan of interventions that sit below the borough objectives.

The MTS outcomes and priorities are set out below. The expected outcomes of the MTS are as follows, presented under three key themes:

Health streets and healthy people

1. London's streets will be healthy and more Londoners will travel actively.

2. London's streets will be safe and secure.

3. London's streets will be used more efficiently and have less traffic on them.

4. London's streets will be clean and green.

A good public transport experience

5. The public transport network will meet the needs of a growing London.

6. Public transport will be safe, affordable and accessible to all.

7. Journeys by public transport will be pleasant, fast and reliable.

New homes and jobs

8. Active, efficient and sustainable travel will be the best option in new developments.

9. Transport investment will unlock the delivery of new homes and jobs.

The MTS requires that the following priorities are addressed through the borough LIPs:

•   A contribution to reducing Londoners' dependency on cars in favour of active, efficient and sustainable modes of travel, with the central aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041.

•   The application of the Healthy Streets Approach across all areas of local transport and public realm policy.

•   The improvement of street environments for people who are walking, cycling and spending time, including the introduction of traffic reduction strategies.

•   The provision of a good public transport experience for those who live in, work in, or visit the borough.

•   The use of the transport principles of Good Growth to guide the development of new homes and jobs.

It is important to note that an Integrated Impact Assessment (incorporating SEA) process was carried out for the MTS. It assessed three strategic options that were derived from the modelling options developed by TfL. Each of the strategic options was comprised of a number of different packages that involved increasing levels of investment and a range of different types of intervention.

The Council is limited in terms of identifying realistic and reasonable alternatives to deliver the MTS through the LIP3. Transport for London's LIP guidance specifies that the LIPs must follow the MTS

and set its objectives and strategy closely in line with this. It is quite specific, aimed at achieving the Mayor's priorities for London.

The development of alternatives is also limited by the opportunities available (i.e. existing infrastructure and planned infrastructure in other plans/ programmes, including wider strategic investment programmes); the short-timescales of the plan and the amount of funding available during that period.

Firstly, it is important to state that a 'do nothing' scenario is not considered to be a realistic or reasonable alternative. The Greater London Authority Act 1999 requires each London borough to prepare a LIP that sets out how the borough will deliver the MTS at the local level. Not preparing the LIP is therefore not a reasonable alternative for the purposes of the SEA process.

In most cases there is not an alternative or genuine choice to be made with regard to what would be considered a larger scale or strategic intervention. Where there are choices in terms of lower scale interventions, these are not mutually exclusive and could not in isolation deliver the MTS outcomes and priorities. Furthermore, the lower scale interventions are less likely to result in significant effects in isolation; however, it is acknowledged that this is dependent on the precise location, scale and design of that intervention. The reality is that a package of different interventions and types will be required in order to deliver the MTS and targets.

It would not be proportionate for the SEA to assess every possible intervention at a local level. As stated above, individual interventions are not mutually exclusive and therefore not reasonable alternatives in their own right. A package of different measures/ interventions will be required to deliver the MTS.

The SEA could potentially assess high level alternatives that explore the trade-offs between hard (new infrastructure) and soft (education and behaviour changes) interventions. However, these options would not be based on an actual package of realistic interventions and as a result the assessment of them would not add value to, or inform the plan-making process.

In developing the LIP3 the Council has sought to identify and take advantage of any realistic opportunities to maximise potential benefits, for example, ensuring that public transport investment is linked to housing and employment growth set out in the Borough's Draft Local Plan.

Taking the above into account, it is considered that there are no realistic or reasonable alternatives to be explored through the SEA process at this stage. In line with the SEA regulations an assessment of the Draft LIP3 has been carried out and presented later in this NTS. If the assessment identifies that there is the likelihood for a significant negative effect as a result of any of the proposed interventions, we will consider it in more detail to determine if there is a reasonable (i.e. realistic and deliverable) alternative that could avoid the identified significant effect.

Part 2: What are SEA findings at this current stage?

3. Assessment of the Draft LIP3

Introduction

Part 2 of the Environmental Report presents an assessment of the Draft LIP3. Assessment findings are presented as a series of narratives under the 'SEA framework' themes. Summary findings for each theme are provided below.

Air quality

Overall, the Bromley LIP3 seeks to improve highways network capacity and function within Bromley and provide greater opportunity for modal shift to accommodate for the expected growth within Bromley and the surrounding areas. The LIP3 is a strategy that seeks to improve transport infrastructure - in particular improvements to sustainable transport options - in order to accommodate this growth with minimal impact, and deliver long term improvements that can support continued population growth beyond the plan period. Without the Bromley LIP3 it is forecasted that such growth could lead to significant negative effects on air quality in Bromley.

In terms of the proposed sub-programmes, key initiatives that will support air quality improvements include: network reliability; local cycle infrastructure; walking infrastructure development; delivery of improvements for pedestrians; public transport interchange and access; and road safety education and behaviour change initiatives. The proposals outlined under Outcome 4, including the development of an anti-idling education programme during 2019/20 to be delivered during the three years of the LIP, support for the adoption of electric taxis; and promoting a move from diesel to electric vehicles car club fleets will support air quality in the borough. Air quality will also be supported be enhanced green infrastructure provision, including the aim in the plan to introduce a minimum of 50 new street trees, each year. This will facilitate the increased absorption and dissipation of nitrogen dioxide and other pollutants. It is considered that project level mitigation will help ensure no significant effects on air quality in the short term arise during the construction phases of programmed LIP3 works.

Biodiversity and Geodiversity

Transport interventions proposed in the borough have the potential to negatively affect biodiversity and geodiversity. Potential impacts are however likely to be limited by the Mayor's Transport Strategy's commitment to ensure that all transport schemes deliver a net positive impact on biodiversity, its focus on green infrastructure provision and project level mitigation. This will help ensure that significant negative effects from new transport schemes are avoided and mitigated, and benefits secured.

The LIP3 also aims to introduce a minimum of 50 new street trees each year as part of transport projects. This will help enhance biodiversity linkages along key transport corridors in Bromley, supporting borough-wide ecological networks.

The implementation of the LIP3 is considered overall to have positive effects for air quality in the borough. This will bring indirect positive effects for biodiversity, including through limiting the effects of poor air quality on ecosystems.

Climate Change

The LIP3 for Bromley proposes a number of programmes that will support reduced greenhouse gas emissions and enhance opportunities for modal shift. These are outlined in the air quality theme narrative above. In this context the LIP3 is considered to proactively manage the pressures of forecasted growth on transport infrastructure to reduce the potential for significant negative effects in terms of emissions, with the potential to deliver long term positive effects for climate change. The LIP also supports carbon sequestration through a commitment to plant a minimum 50 street trees a year.

In terms of climate change adaptation, the LIP3 sets out a range of measures which will help to minimise vulnerability and provide resilience to flooding. This includes through the implementation of Sustainable Drainage Systems. The LIP3 also seeks to implement green infrastructure provision that reduces the urban heat island effect as part of its transport projects. This will support adaptation to the likely effects of climate change.

Historic Environment and Landscape

A number of the initiatives proposed by the LIP3 will directly or indirectly support the protection and enhancement of the historic environment and landscape and townscape quality. This includes tree planting, enhancements to the public realm around stations, and high quality pedestrian and cycle networks. The LIP3 also suggests that where appropriate, larger schemes may seek to enhance and 'promote the borough's heritage'. This will support the integrity of the historic environment and promote local distinctiveness and character through facilitating enhancements to the public realm.

The programmes proposed through the LIP3 will also help enhance the setting of heritage assets through helping facilitating modal shift from the private car. In this context pedestrian network enhancements, local cycle network development, cycle contraflows, severance reduction, high quality cycle parking, healthy routes to school, travel planning and other measures proposed through the LIP3 will directly or indirectly support the quality of the public realm through helping to limit the impact of road traffic on townscape quality and the setting of the historic environment. The LIP3's focus on connectivity and accessibility is also likely to support improved access to heritage assets.

In-combination effects on the historic environment and landscape / townscape quality may result from the strategic allocations proposed for Bromley and LIP3 initiatives. This includes through a stimulation of traffic growth and increasing visual effects on the setting of the historic environment and landscape / townscape quality. However it is likely that the initiatives proposed by the LIP3 will in many respects support the integrity of the historic environment and landscape / townscape quality through helping to mitigate the impacts of new development areas from transport.

Land, Soil and Water Resources

The majority of the programmes proposed through the LIP3 focus on the development and improvement of existing infrastructure. As such the LIP3 is not considered likely to lead to significant negative effects in terms of land, soil and water resources in relation to landtake or soil quality.

The LIP3 seeks to integrate sustainable drainage systems within new transport infrastructure where appropriate. These measures will support water quality through helping to regulate surface water runoff and managing drainage in ways which will help limit the potential for pollutants from transport to enter watercourses in the borough.

Communities

Overall, the Bromley LIP3 has a strong focus on supporting modal shift from the private car. In this respect, all of the programmes proposed through the LIP3 are considered to positively affect communities in the long term through: reduced congestion on the highways network; improved connectivity and accessibility; enhanced opportunities for sustainable transport including active travel opportunities; improved safety and reduced road danger; and reduced impacts of inappropriate and unsafe parking. Public transport and pedestrian and cycle network enhancements proposed through the initiatives will have particular benefits for transport disadvantaged individuals and groups. This includes those from deprived communities, and younger and older groups who have increased reliance on public transport networks.

The Equalities Impact Assessment (EqIA) which accompanies the LIP3 has considered potential impacts of the LIP3 proposals on different groups in detail.

Health and Wellbeing

The programme of works proposed through the LIP3 may potentially negatively affect health and wellbeing in the short term – during construction phases – as a result of noise and air pollution. However, it is expected that project level mitigation will ensure that no significant negative effects arise in this respect.

Overall the LIP3 proposals will bring a range of benefits for the health and wellbeing of residents in Bromley through a focus on enhancing accessibility to services, facilities and opportunities by non-car modes and promoting enhanced active transport links.

Health and Wellbeing

Part 3: What happens next?

4. Next steps

Plan finalisation

Following the completion of consultation on the current LIP3 document, comments will be reviewed and analysed. The final LIP3 will then be developed in early 2019, with a view to adoption later in 2019. Any changes arising to the LIP3 following consultation will need to be assessed as part of the SEA process.

An Adoption Statement will be published to accompany the adopted LIP3 and will present:

- The reasons for choosing the preferred strategy for the LIP3 as adopted in the light of other reasonable alternatives dealt with;

- How environmental considerations have been integrated into the LIP3;

- How consultation responses have been taken into account; and

- Measures that are to be taken to monitor the significant environmental effects of the LIP3.

Monitoring

At the current time, there is a need only to present 'measures envisaged concerning monitoring'. The SEA Regulations expect monitoring and mitigation to be linked, and that the focus should be on any significant negative effects identified through the assessment. Where possible existing arrangements for monitoring should be used to avoid duplication of effort.

The Draft LIP3 includes a range of indicators to monitor the delivery of the outcomes of the MTS. Based on the findings of the SEA at this stage, which predicted no significant negative effects, no specific monitoring measures have been proposed.

Further consideration will be given to monitoring in due course once the responses to the Draft LIP3 and accompanying Environmental Report have been received. If necessary, the SEA Adoption Statement will set out monitoring measures against SEA objectives, including responsibilities.

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