

Updated SEA screening report by the London Boroughs of Lambeth and Southwark: draft submission version of the Draft South Bank and Waterloo Neighbourhood Plan 2017 – 2032 (August 2017)

Introduction

This updated Strategic Environmental Assessment (SEA) screening report relates to the draft submission version of the Draft South Bank and Waterloo Neighbourhood Plan 2017 – 2032 (sent to Lambeth and Southwark Councils in August 2017).

An initial SEA screening report was prepared by the London boroughs of Lambeth and Southwark in December 2016 on the South Bank and Waterloo Neighbourhood Plan pre-submission consultation draft (November 2016) and the views on this initial screening were sought by the three statutory bodies Historic England, Natural England and Environment Agency for six weeks from 6 December 2016 to 18 January 2017. All three statutory consultees agreed with the conclusion of the initial SEA screening that there are unlikely to be significant effects of the draft Plan and therefore a full Strategic Environmental Assessment would not be necessary.

In August 2017 a draft submission version of the SoWN Draft Neighbourhood Plan was prepared by SoWN taking into account consultation responses on the pre-submission version dated November 2016. Amendments to the Draft Plan were generally minor but included a proposed new policy on air quality. Accordingly an addendum to the initial SEA screening report was prepared by the London boroughs of Lambeth and Southwark on the draft submission version of the draft neighbourhood plan. Again, all three statutory bodies were consulted (from 11 October 2017 to 27 October 2017) on the addendum and its conclusion that the inclusion of a new policy on air quality does not affect the conclusion of the initial screening assessment that a full SEA would not be necessary. Natural England and Environment Agency responded to this second SEA consultation and again agreed that it was unlikely the draft submission version of the draft neighbourhood plan would have significant effects and therefore a full SEA would not be required.

This report brings together the recommendations of the initial assessment and the subsequent addendum and includes both sets of responses from the three statutory bodies in Appendix 1.

Why is a Strategic Environmental Assessment screening required?

Before a neighbourhood plan can be 'made' (adopted), it must meet a series of basic conditions. One of these is whether the making of the neighbourhood plan is compatible with European Union obligations, including requirements under European Union Directive 2001/42/EC, known as the Environmental Assessment of Plans and Programmes Directive or the 'SEA Directive'. The aim of the SEA Directive is:

to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment (extract from 2001/42/EC)

The Environmental Assessment of Plans and Programmes Regulations 2004 transpose the SEA Directive into UK law and state that a screening determination should be reached by 'the responsible authority'. In this case, there are two authorities that are jointly responsible for SEA screening: the London Boroughs of Lambeth and Southwark.

The responsible authority must determine whether a plan or programme under assessment is likely to have significant environmental effects. The determination must be made taking account of the criteria set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004, and in consultation with the Environmental Agency, Historic England and Natural England.

In order to decide whether a proposed neighbourhood plan is likely to have significant effects on the environment, and hence requires SEA, it should be 'screened' at an early stage once the plan remit and objectives have been formulated. Screening is 'Stage A' in the Government's recommended six stage approach to SEA for neighbourhood plans.

If, after screening assessment and consultation with the statutory bodies, the responsible authority determines that the neighbourhood plan is likely to have significant environmental effects, then a full Environmental Assessment will be required. Conversely, if it is determined through screening and consultation with the statutory bodies that the neighbourhood plan is unlikely to have significant environmental effects, then the neighbourhood forum need not concern itself with subsequent stages of the SEA process.

Overview of the proposed submission SoWN Neighbourhood Plan

The South Bank and Waterloo Neighbourhood Plan is being developed by the 550 member-strong South Bank & Waterloo Neighbours (SoWN). This group is a formally designated business-led neighbourhood planning forum. The neighbourhood area is shown in Figure 1 below.

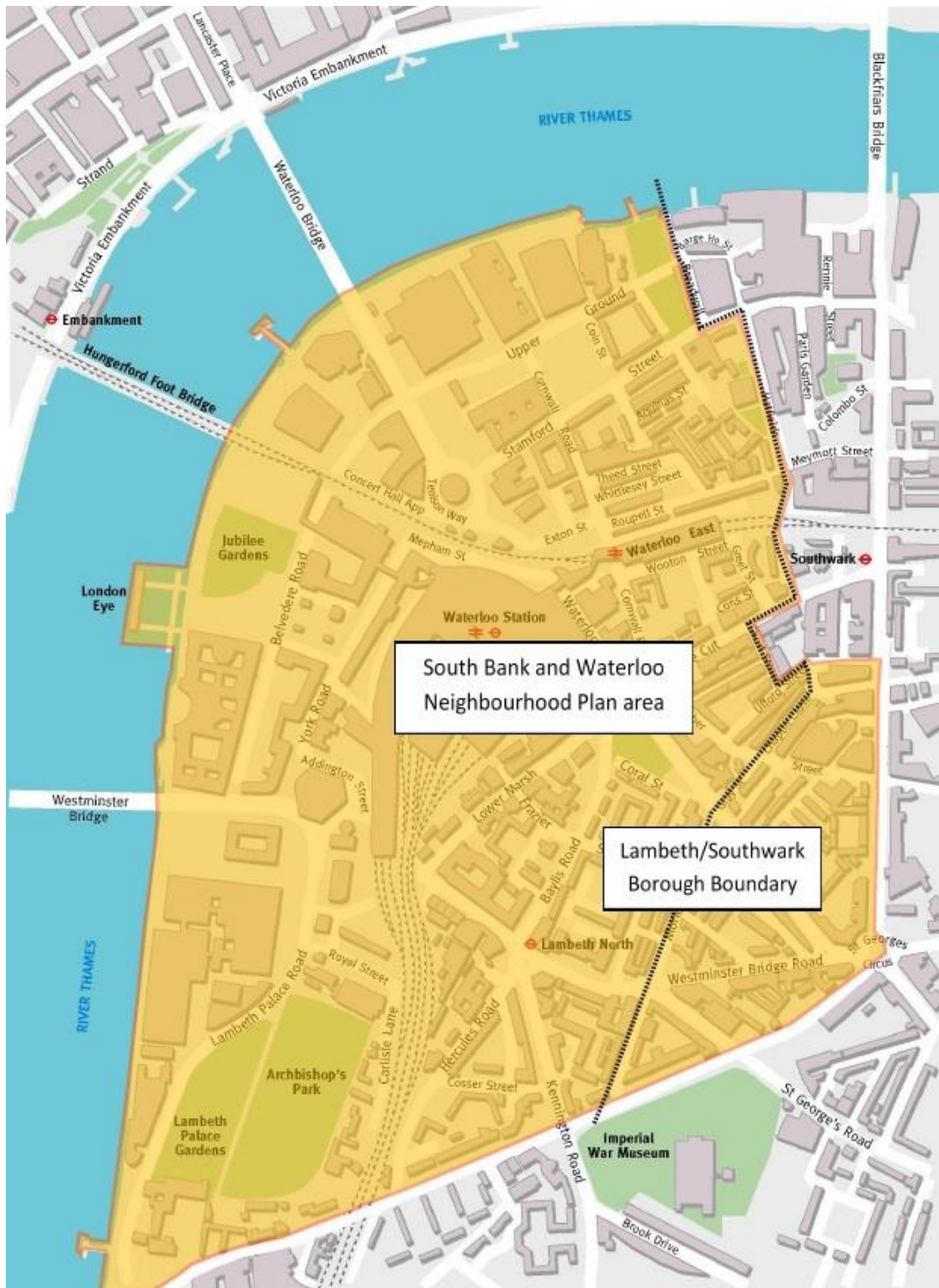


Figure 1: SoWN neighbourhood plan area

Once ‘made’, the SoWN neighbourhood plan will form part of the statutory development plan for the area it covers, sitting alongside the Lambeth and Southwark Local Plans and the London Plan, with equal weight in decision-making. The period of the proposed submission neighbourhood plan is fifteen years.

The submission version neighbourhood plan includes policies and guidance on seven key themes that reflect the outcome of a general consultation held in 2014 and pre-submission consultation in 2016. The seven key themes are:

- Green infrastructure, open space and air quality
- Housing
- Development management
- Retail and work
- Social infrastructure and culture
- Streetscape and transport
- Planning gain and mitigation

Issues and objectives have been established for each theme and the policies have been formulated to address these issues and objectives. There is no intention to allocate sites for development in the neighbourhood plan.

The summary below has been provided by SoWN and gives an overview of the themes, objectives and policies in the pre-submission consultation draft Neighbourhood Plan.

Theme 1 - Green infrastructure, open space and air quality

Objectives:

- Protecting and creating open space and green infrastructure
- Minimising the impact of construction on open space
- Reductions in air pollution, noise pollution, and other negative environmental effects

Local issue identified by SoWN	Summary of proposed policy
There is a lack of green open space in the area and development continues both to reduce this and put pressure on existing spaces	If developers build on open space, they must replace any open space lost with better quality and bigger open space than was lost.
Many streets are polluted, noisy and unpleasant to navigate on foot, and back streets can be designed in ways that favour cyclists over pedestrians.	Network of back streets in Waterloo called ‘Greenways’ has been identified which provide low pollution walking routes through the neighbourhood.
South Bank & Waterloo suffers from a range of environmental problems including poor air quality, lack of open space, localised flooding, loss of trees.	Developers must mitigate these effects e.g. by building green roofs, providing separate outside space for residents and the public, compensating for open space taken for development, and replacing any trees lost.
Development sites can sit empty for years and should be put to use.	Developers should make their sites available to local people for food growing, sports pitches and other temporary uses.

Theme 2 - Housing

Objectives:

- Responding to the demand for affordable housing among underrepresented groups
- Encouraging innovation in form, design and management of local housing
- Protecting those accommodated in the private rented sector from exploitation

Local issue identified by SoWN	Summary of proposed policy
Certain groups of people are particularly vulnerable to being unable to access housing in the area.	Affordable housing should be made available for older people, including those who need live-in support, key workers, and staff in sectors such as hospitals and retail which are struggling to recruit people who can afford to live nearby
Land values mean that housing isn't affordable for people on lower and middle incomes.	Smaller than usual flat sizes can be developed if they are well designed and are accompanied by facilities such as communal laundry and dining areas
New forms of housing should be provided to increase the sense of community.	Developers should build more cohousing and co-ops. Underneath flats, community retail should provide work for residents above

Theme 3 - Development management

Objectives:

- Ensuring appropriate mitigation of development on the surrounding community
- Aiming for a mix of development to suit the needs of a range of users
- Respecting heritage and character

Local issue identified by SoWN	Summary of proposed policy
Hotels are being built that do not provide benefits to the local community.	If hotels are built, they must show how they are providing jobs for local people, and welcome community groups' use of meeting rooms and facilities.
Developers are too often providing less affordable housing than council policy demands, citing 'lack of viability'.	Developers should be compelled to make public any viability assessments that are used to justify building less affordable housing.
Councils have no way of compelling developers to fund community benefits like affordable housing if, at a later stage, developments turn out to be more profitable than originally thought.	Councils should introduce a 'clawback' mechanism on large developments, allowing them to claim funds for community improvements if the development was originally undervalued.

Theme 4 - Retail and work

Objectives:

- Supporting a mix of retail for a range of users including residents
- Encouraging enterprise and start-up businesses
- Resisting further loss of office space

Local issue identified by SoWN	Summary of proposed policy
Small independent shops like the ones on Lower Marsh are being priced out of the area by rising rents.	Big developments should provide a certain number of affordable retail units. Empty units should be available cheaply on a temporary basis while longer-term tenants are identified.
There is a lack of office space in the area and new companies can't set up here.	Developers should provide, flexible, affordable workspace and office units
Lower Marsh Market needs support to grow.	Development on Lower Marsh should contribute to improvements to infrastructure for the market.

Theme 5 - Social infrastructure and culture

Objectives:

- Supporting a range of facilities for the use of the community
- Seeking revenue to sustain community activity
- Developing local access to culture in all its forms

Local issue identified by SoWN	Summary of proposed policy
Certain buildings are used for activity that is important to the community.	Waterloo Action Centre, Living Space, Pineapple Pub and Make Space Studios (among others) should receive Asset of Community Value status
Leake Street is an important route linking South Bank and Waterloo, and it is also a cultural asset and should grow in ways which are sensitive to its existing use	Restaurants and cultural uses of tunnels running off Leake Street are acceptable.

Theme 6 - Streetscape and transport

Objectives:

- Encouraging sustainable transport and reducing vehicular traffic through the neighbourhood
- Supporting key public realm improvements which contribute to the sense of place
- Reducing the potential for accidents caused by construction traffic

Local issue identified by SoWN	Summary of proposed policy
Many streets are polluted, noisy and unpleasant to navigate on foot, and back streets can be designed in ways that favour cyclists over pedestrians.	Network of back streets in Waterloo called 'greenways' will be developed which prioritise pedestrians. Development will contribute to improving these routes.
The neighbourhood is confusing and difficult to navigate	Large developers should implement Legible London signage, to build on current network of street-based maps and encourage consistency.

Theme 7 - Planning gain and mitigation

Objectives:

- Securing mitigation of the impacts of development
- Ensuring there is maximum community input into measures to mitigate the impacts of development and allocation of neighbourhood CIL

Local issue identified by SoWN	Summary of proposed policy
The area is poorly maintained and insufficient funding is available for local groups to help deliver improvements.	Part of Community Infrastructure Levy (a tax on development) should be used as revenue to support ongoing local efforts to improve the area, maintain social infrastructure and deliver the ambitions of the neighbourhood plan.

Local environmental issues identified by SoWN

On the basis of evidence it has gathered, SoWN conclude within the submission version draft neighbourhood plan that the neighbourhood area is characterised as follows:

Variety and volume of people <ul style="list-style-type: none">• 12,000 residents• 55,000 workers• 28m tourists a year• 100m commuters a year• Large student population	Vital economic drivers <ul style="list-style-type: none">• Major public companies like Shell, IBM, ITV• World renowned cultural hub including National Theatre, Southbank Centre, British Film Institute, Old Vic• Major university, teaching hospital and UK's busiest train station• Visitor attractions like London Eye, SEALIFE London Aquarium and IWM
Change <ul style="list-style-type: none">• Declining public investment• Projected growth of 1500 extra residential units by 2026 (London Plan 2015)• Projected growth of jobs by 15,000 by 2026 (London Plan 2015)	Heritage and interest <ul style="list-style-type: none">• River Thames, river vistas and bridges• Open spaces such as Archbishop's Park, Jubilee Gardens, Millennium Green• Historic places including Lambeth Palace, County Hall, Royal Festival Hall and Lambeth Estate

Other key baseline characteristics identified as important by SoWN include:

- The area's 12,000 residents are generally similar demographically to the Lambeth/Southwark average; however, there is variability in terms of socio-economic indicators across the area.
- Although residential development in the area is increasingly 'high end', 40% of the housing stock is social rented or co-op housing, levels far in excess of the borough average.
- The largest proportion of households (30%) live in 'Private rented: Private landlord or letting agency' accommodation. That compares with 24% for the local authorities of Lambeth and Southwark, 15% for London region and 14% for the whole of England.
- The resident population is much more highly qualified than the England average. 13% of the area's residents have no qualifications compared to 22% in England.
- The largest ethnic group is 'White' representing 59% of the neighbourhood area's population, comparable with London. The second largest ethnic group is 'Asian/Asian British' with 18%.

SoWN have also considered the role of the South Bank and Waterloo against the six key spatial planning issues identified in the Lambeth Local Plan 2015. Their conclusions are summarised in the table below.

Table 1: Key planning issues for Lambeth, and the role of South Bank and Waterloo

Key spatial planning issue for Lambeth in Lambeth Local Plan 2015	Is South Bank and Waterloo central to the achievement of the Lambeth-wide issue?
1) Accommodating population growth	Yes. In line with London Plan Opportunity Area designation, growth in housing and jobs across Lambeth will be mainly focussed on the Waterloo and Vauxhall (linked to Battersea/Nine Elms) Opportunity Areas and the town centre of Brixton.
2) Achieving economic prosperity and opportunity for all	Yes. See above. The Lambeth Local Plan summary of issues makes specific reference to: internationally recognised locations (Waterloo, the South Bank, the Thames, Brixton); London's most significant agglomeration of cultural facilities at the South Bank; and Europe's busiest station terminal (Waterloo). Also, the north of the borough is designated as part of the London Central Activities Zone, promoted for finance, specialist retail, tourist and cultural uses.
3) Tackling and adapting to climate change	Somewhat. Public transport accessibility is good in north and central Lambeth; and opportunities for low carbon development are not specific to the South Bank and Waterloo Area. Also, the whole borough is within an Air Quality Management Area in relation to a breach of nitrogen dioxide, resulting from road traffic.
4) Providing essential infrastructure	Yes. For example, the Guy's and St. Thomas' Hospital NHS Foundation Trust estate is undergoing ongoing reconfiguration (which will both include Combined Heat and Power programmes).
5) Promoting community cohesion and safe, liveable neighbourhoods	Yes. Access to open space across Lambeth is good, but is unevenly spread, with limited access in the north of the borough.
6) Creating and maintaining attractive, distinctive places	Yes. The London Plan designates the South Bank, along with neighbouring Bankside in Southwark, as a Strategic Cultural Area; and designates a River Thames Policy Area to protect and enhance the special character of the River Thames and Thames-side. Also, in respect of heritage, Lambeth Palace and its environs are of particular significance in Lambeth, as is the South Bank.

Additional local environmental issues identified by the London Boroughs of Lambeth and Southwark

In addition to the summary of issues and characteristics provided by SoWN above, the London Boroughs of Lambeth and Southwark would add the following points:

- There are 7 conservation areas in Lambeth and 2 conservation areas in Southwark within the Waterloo and South Bank neighbourhood area
- There are approximately 278 statutory listings within the area, and 47 locally listed buildings (within the Lambeth part)
- There are two Archaeological Priority Areas within the neighbourhood area
- There is one historic park/garden (Archbishop's Park) and three local spaces of heritage value
- The Westminster World Heritage Site lies opposite Waterloo and the South Bank on the north bank of the Thames and major developments on the Lambeth side can have impacts on that site.
- Almost the entire area falls within a flood risk zone (mainly zone 3, though some parts zone 2)
- The River Thames, Lambeth Palace Garden, Archbishop's Park and Waterloo Millennium Green are sites of nature conservation importance (of metropolitan, borough, local and local significance respectively)

Screening methodology

Screening involves giving consideration to the anticipated scope of the plan in question and the nature of environmental issues locally, to assess the likelihood of the plan leading to 'significant effects on the environment'.

Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 lists a series of criteria that should be taken into account when establishing the potential for the plan to result in significant effects. The criteria/issues listed in the Regulations provide a methodological basis for screening.

Whether a neighbourhood plan requires a strategic environmental assessment will depend on what is proposed in the draft plan. National Planning Policy Guidance on neighbourhood planning states that a strategic environmental assessment may be required, for example, where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan

Updated screening assessment by London Boroughs of Lambeth and Southwark

The table below sets out the updated assessment by the London Boroughs of Lambeth and Southwark of the draft submission version of the SoWN draft neighbourhood plan 2017 – 2032 (August 2017), following consultation with the statutory consultees Natural England, Historic England and the Environment Agency, against each of the criteria in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004. All three statutory bodies responded to the initial SEA screening report on the pre-submission consultation draft SoWN NP November 2016 and agreed with the report that significant effects from the draft Plan were unlikely and a full SEA would not be necessary. In 2017 a draft submission version NP was prepared taking into account previous consultation responses. A proposed new policy on air quality was included in the draft submission version. An addendum to the initial SEA screening report was prepared to reflect this new policy. Statutory bodies were consulted again, and Natural England and Environment Agency responded that they continued to agree that significant effects were unlikely and a full SEA would not be necessary. Consultation responses received from the statutory bodies are provided as Appendix 1.

Criterion	Consideration	Likely significant effect?
1. The characteristics of plans and programmes having regard, in particular, to:		
(a) the degree to which the plan sets out a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The draft plan identifies priorities for projects and activities in the neighbourhood area but it does not seek to be comprehensive and the scope of its policies is limited. In addition, the plan does not allocate sites for development.</p> <p>The allocation of the neighbourhood element of CIL (NCIL) falls to the two local planning authorities that collect it and not to the neighbourhood forum. The proposed schedule of projects for NCIL spend within the neighbourhood plan is only indicative.</p>	No
(b) the degree to which the plan influences other plans and programmes including those in a hierarchy	<p>It is not expected that other plans or programmes will sit in a hierarchical relationship with this neighbourhood plan following its adoption. It will form part of the statutory development plan for both Lambeth and Southwark and its policies will need to be complementary to policies already adopted in the two borough local plans plus the London Plan.</p> <p>If the neighbourhood plan does form the context for other documents covering this area in the future, its degree of environmental impact in relation to this criterion is unlikely to be significant.</p>	No
(c) the relevance of the plan for the integration of environmental considerations in	A number of the neighbourhood plan's objectives do relate to the integration of environmental considerations in particular with a view to promoting sustainable development. Notably, an objective is to: "Encourage	No

Criterion	Consideration	Likely significant effect?
particular with a view to promoting sustainable development	<p>sustainable transport and reducing vehicular traffic through the neighbourhood”, with the emerging Draft Plan proposing that this should be achieved through a “Network of back streets in Waterloo called ‘greenways’ will be developed which prioritise pedestrians. Development will contribute to improving these routes.”</p> <p>However, it is not anticipated that there is potential for significant positive effects, given the number of factors outside of the NP’s control that influence sustainable transport. Equally, it is not clear that there is any potential for significant negative effects. From a review of the emerging policy it is apparent that there is little likelihood of the plan actually hindering traffic flows through the area. Rather, the intention is to support existing pedestrian routes (through a ‘greenways’ approach).</p>	
(d) environmental problems relevant to the plan	<p>SoWN have identified a number of environmental problems in the area to be covered by the neighbourhood plan and the boroughs agree with this analysis, which is also reflected in their respective Local Plans. These problems include flood risk, traffic congestion resulting in poor air quality and risks to the protection of open space and biodiversity.</p> <p>The neighbourhood plan wishes through its policies to have a positive effect on these environmental problems, by reinforcing the protection for open space and biodiversity that already exists within the borough Local Plans; by identifying ‘greenways’ for pedestrian movement through the area away from the worst of the road traffic congestion, air quality and noise; and by encouraging the introduction of additional green infrastructure such as tree planting and green roofs.</p> <p>However, given that the neighbourhood plan does not include site specific allocations, the extent of its positive effects on these environmental problems, whilst welcome, is not likely to be significant.</p> <p>In addition, although there may be some issues with the wording of policies (including potential duplication of borough Local Plan policies), these policy objectives are consistent with the objectives already adopted in the boroughs’ Local Plans and in the London Plan. Those policies have already been subject to sustainability appraisal, which included SEA.</p>	No

Criterion	Consideration	Likely significant effect?
(e) the relevance of the plan for the implementation of Community legislation on the environment (for example plans and programmes related to waste management or water protection)	The neighbourhood plan does not seek to influence or introduce policy relating to waste management or water protection. It is not expected to have a significant effect on the implementation of Community legislation on the environment.	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
(a) The probability, duration, frequency and reversibility of the effects	The plan does not seek to allocate sites for development and it does not include policies relating to the height, bulk, mass or density of development. In relation to the design of development, the matters with which the neighbourhood plan are concerned are provision of external amenity space and inclusion of green infrastructure. These policies are not expected to have significant environmental effects (in terms of probability, duration, frequency and reversibility) beyond those already assessed through the sustainability appraisal of the existing local plans for Lambeth and Southwark.	No
(b) the cumulative nature of the effects	The neighbourhood plan will be implemented alongside the borough Local Plans and the London Plan, so it is expected to make a contribution to cumulative effects on the environment. However, this contribution is expected to be minor, relative to that of the borough Local Plans and London Plan. In particular, those plans will have a far more significant influence on the overall distribution of development and the overall level of growth taking place in the area.	No
(c) the trans-boundary nature of the effects	The neighbourhood plan is not expected to have any trans-boundary effects on other Member states. The area it covers falls entirely within London and the UK, far removed from any international borders. Any effects on international populations living in the area would be extremely indirect and are considered unlikely to be significant.	No
(d) the risks to human health or the environment (e.g. due to accident)	Environmental quality and public health matters are a focus of the neighbourhood plan. Objectives include reducing the potential for accidents caused by construction traffic and reducing the harm caused by poor air quality. However, the scope of the neighbourhood plan's policies is limited. Whilst it is anticipated that they will have some positive effects on reducing risks to human health or the environment, it is not expected that these will be significant given the	No

Criterion	Consideration	Likely significant effect?
	<p>number of factors outside the neighbourhood plan's control.</p> <p>The policies on open space, green infrastructure, air quality and transport that may achieve limited positive effects in this regard are all consistent (in strategic objective if not in detailed wording) with the policies in the existing borough Local Plans. Those plans have already been the subject of sustainability appraisal, including SEA.</p> <p>The neighbourhood plan is not expected to have any negative effects on risks to human health or the environment.</p>	
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	<p>The spatial extent of the neighbourhood plan area is not large. However, South Bank and Waterloo is a densely populated area (in the national context) and there are significant numbers of people who work within and visit the area. It is also important to note that the area is important economically at the London scale.</p> <p>Nevertheless, the scope of the policies in the neighbourhood plan is narrow and does not include the allocation of sites or requirements relating to the bulk, mass, height or density of development. It is therefore considered unlikely that the neighbourhood plan will have a direct effect on the size of the population in the area or the overall level of growth. In addition, whilst the number of people that could be affected by the plan's policies is large, the overall effect of those policies is not likely to be significant. Therefore there are not anticipated to be significant environmental effects in relation to this criterion.</p>	No
<p>(f) the value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> ▪ Special natural characteristics or cultural heritage ▪ Exceeded environmental quality standards or limit values ▪ Intensive land use 	<p>The South Bank and Waterloo area has both value and vulnerability as a result of its cultural heritage (and that of the adjacent Westminster World Heritage Site); its poor air quality; and its intensive use of land; and its location in a flood risk zone.</p> <p>However, the scope of the policies in the neighbourhood plan is considered to be limited and, whilst it is anticipated that the plan will have some positive effects on these characteristics of the area, it is unlikely that these effects will be significant. The most important consideration is that the plan does not include site specific allocations and does not seek to influence the bulk, mass, height or density of development. It does not set limits or targets in relation to the quantum of</p>	No

Criterion	Consideration	Likely significant effect?
	<p>development to be accommodated in the area. It does not seek to change the existing strategic policy approach on heritage assets or on the management or movement of road traffic through the area.</p> <p>Whilst the plan does seek to mitigate the negative effects of poor air quality on the local population (through the proposed identification of 'greenway' walking routes for example), it is unlikely to be able directly to change the nature of the problem itself in a significant way. Similarly, it does seek to achieve a positive effect on flood risk by encouraging green infrastructure, but this is also not expected to be significant. In addition – as stated under (d) above - these policy objectives are consistent in intent with those in the existing local plans, which have already been subject to sustainability appraisal, including SEA.</p> <p>Therefore overall the neighbourhood plan is not considered likely to have significant environmental effects in relation to this criterion.</p>	
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status	<p>The Westminster World Heritage Site is an area or landscape with international protection status. However, the neighbourhood plan does not include site specific allocations and does not seek to influence the bulk, mass, height or density of development within its area. It does not set limits or targets in relation to the quantum of development to be accommodated in the area. It does not seek to change or influence the existing strategic policy approach on heritage assets or on the WWHS, set out in the existing London Plan, Lambeth Local Plan 2015, the saved Southwark Plan policies (2007) or the LB Southwark's Core Strategy (2011). Therefore it is not expected to have significant environmental effects in relation to this criterion.</p>	No

Conclusion

The conclusion of this updated screening assessment by the London Boroughs of Lambeth and Southwark, following consultation with the statutory bodies Natural England, Historic England and Environment Agency, is that the draft submission version draft SoWN neighbourhood plan (August 2017) would not have significant environmental effects and therefore does not require an Environmental Assessment.

Appendix 1

Catherine Carpenter
Delivery Lead Planning Strategy and Policy
Planning, Transport and Development
Neighbourhoods and Growth
London Borough of Lambeth
Phoenix House 1st Floor
10 Wandsworth Road
London SW8 2LL

Our ref: SL/2009/104986/SE-12/SC1

Your ref: email

Date: 18 January 2017

Dear Catherine,

South Bank & Waterloo Neighbourhood Plan: initial SEA screening assessment

Thank you for consulting the Environment Agency on the above document.

The Environment Agency is in agreement with the conclusion of the initial screening assessment that South Bank & Waterloo Neighbourhood Plan is unlikely to have any significant environmental effects and therefore a full Strategic Environmental Assessment will not be required.

Please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely,

Charles Muriithi, MRTPI
Planning Specialist

[Redacted signature block]



Historic England

Mr B Stephenson
South Bank and Waterloo Neighbours
[REDACTED]

Our ref: PL00050326
and PL00054264

13th January 2017

Dear Mr Stephenson,

Draft South Bank and Waterloo Neighbourhood Plan 2017-2032 (November 2016) and associated SEA screening report.

The Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) require Historic England, as a statutory agency, to be consulted on Neighbourhood Plans where the Neighbourhood Forum considers our interest to be affected by the Plan. In this case we note that this large neighbourhood area has a rich and diverse architectural legacy which includes some of London's most important historic buildings and characterful areas. Accordingly we have reviewed this document against the National Planning Policy Framework and its core principle that heritage assets be conserved in a manner appropriate to their significance, so they can be enjoyed for their contribution to the quality of life of this and future generations. Further to the advice in our email dated 15 November 2013, we are pleased to offer the following comments on this consultation version of your Neighbourhood Plan.

Historic England welcomes the creation of this Plan, which we found easy to read and practical in the way it promotes more socially engaged development. Nevertheless, there are areas of the Plan that in our view would benefit greatly for strengthening. Such changes would help make the policies more coherent with the objectives, the issues raised and the built context. Most notably, you have identified heritage and character as key issues, but there are no policies to address them in the Plan.

While we note the references to heritage and local character in the thematic objectives (p.19), the key characteristics of the area (p.15), and as a recurrent issue that has arisen in consultations (p.40, 103 and 110), there is little evidence that this Plan actively seeks to engage with the historic environment. This is visible in the limited analysis of local character presented, as well as the lack of a policy that seeks to promote the heritage and character of this area, either in itself or through its role in place making, or through the important contribution it makes to the cultural offer of the area. Instead, the development management policy P8 focuses on hotels, while the text in paragraph 8.3.6 is limited to general guidance.

While we agree that this Plan should not seek to replicate Local Plan, regional or national planning policy, the omission of heritage is disappointing, and we would welcome the opportunity to discuss how it might be overcome given the significance of the historic environment in this area. Such a discussion could also help bring the Plan more in line with



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.





Historic England

the advice in paragraphs 7 and 8 of the NPPF that the planning system should jointly and simultaneously seek gains across the three dimensions of sustainable development, which include the historic environment.

Similarly we note that there are no policies that relate to the major cultural institutions based in the area, or those that border the area which include the Westminster World Heritage Site. These institutions are all housed in nationally significant buildings and make an important contribution to both local and London wide character. Both they and the surrounding cultural heritage sites are inexorably linked with the success and future development of this area. Without them both the built form, land use patterns and vitality of this area would be radically different, as they drive the huge numbers of visitors to the neighbourhood area. We consider that this Neighbourhood Plan offers a unique chance for local people to engage with these institutions and the shared local heritage, but currently the Plan is missing a great opportunity to place local people and businesses' views at the heart of this discussion.

Strategic Environmental Assessment screening report

Historic England welcomes the London Boroughs of Lambeth and Southwark's report which correctly highlights the importance of heritage to this area, and helpfully sets out the range of heritage assets within the neighbourhood area boundary, as well as its position in the setting of the Westminster World Heritage Site. We agree with the Boroughs' screening opinion that there are unlikely to be significant environmental effects to the historic environment caused by this Plan, and therefore it would not require an environmental assessment.

Conclusion

Please note that this response relates to historic building and historic area matters only. Any archaeological implications of the Neighbourhood Plan are subject to separate advice from the Greater London Archaeological Advisory Service. Please also note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this Neighbourhood Plan, and which may have adverse effects on the environment.

Yours sincerely,

David English

Historic Places Adviser



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Date: 18 October 2017
Our ref: 228760
Your ref: South Bank & Waterloo Plan (SEA Screening)



Ms Vanessa Rodgers
Senior Planner
Planning, Transport and Development
Neighbourhoods & Growth
London Borough of Lambeth

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

[REDACTED]

Dear Ms Rodgers

South Bank and Waterloo Neighbourhood Plan SEA and HRA Screening Assessments

Thank you for your consultation on the above dated and received by Natural England on 11th October 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance¹. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Sharon Jenkins
Consultations Team

[REDACTED]

From: Plan Cons Area Team (Thames Valley) (NE)
<PlanConsAreaTeamThamesValley@defra.gsi.gov.uk>
Sent: 03 February 2017 11:11
To: Carpenter,Catherine
Subject: Natural England Response - URGENT Responses to SEA screening assessment consultations
Attachments: NE Feedback Form - 2017.pdf
Importance: High

Dear Ms Carpenter,

Apologies for the delay in responding to you regarding the below consultations however please accept this email as our response to these three SEA screening assessments.

Having taken a look through the SOWN Neighbourhood Plan SEA screening assessment Natural England would be of the opinion that the conclusion drawn in that document is acceptable and that the plan wouldn't require SEA as part of its development.

The further two SEA screenings for the two SPDs aren't for policy areas that Natural England would normally make comment upon hence we would have no specific comment to make regarding those nevertheless given the precise nature of the SPDs we could agree that full SEA not being required is acceptable in this instance.

Do let me know if you'd need anything further and again apologies for the delay in our response to you on this.

Regards,

Piotr Behnke
Adviser
Sustainable Development
Thames Team
[REDACTED]

From: Carpenter,Catherine [REDACTED]
Sent: 01 February 2017 14:18
To: Consultations (NE)
Subject: URGENT Responses to SEA screening assessment consultations
Importance: High

Dear Natural England Consultations team,

I wrote to you twice in December last year formally to seek your comments on initial SEA screening assessments of a draft neighbourhood plan and two draft SPDs, as required by the Environmental Assessment of Plans and Programmes Regulations 2004. I attach the original emails sent.

I have not received any replies or acknowledgements from Natural England. We do need some form of response from you in order to fulfil our obligations under the Regs. Please could you advise whether and by when you will respond.

Thanks very much.

[REDACTED]

From: Muriithi, Charles [REDACTED]
Sent: 14 November 2017 10:55
To: Rodgers, Vanessa
Subject: RE: South Bank and Waterloo Neighbourhood Plan SEA and HRA Screening Assessments

Dear Vanessa,

Thank you for hosting us yesterday. We agree with the conclusion of the updated screening assessment that there are unlikely to be significant effects of the Plan and therefore a full SEA would not be necessary.

Please remind me which NP you referred to in your meeting notes.

Kind regards

Charles

From: Rodgers, Vanessa [REDACTED]
Sent: 14 November 2017 10:15
To: Muriithi, Charles [REDACTED]
Subject: FW: South Bank and Waterloo Neighbourhood Plan SEA and HRA Screening Assessments

Hi Charles

Here is the updated SEA and HRA on the revised South Bank and Waterloo Neighbourhood Plan. Like the initial SEA screening assessment, the updated screening assessment concluded that there are unlikely to be significant effects of the Plan and therefore a full SEA would not be necessary. The EA agreed with this conclusion on the initial SEA screening. Hopefully your position remains the same. Please let us know your thoughts.

Thanks and kind regards
Vanessa.

From: Rodgers, Vanessa
Sent: 11 October 2017 12:37
To: [REDACTED]
'PlanConsAreaTeamThamesValley@defra.gsi.gov.uk' <PlanConsAreaTeamThamesValley@defra.gsi.gov.uk>
Cc: Carpenter, Catherine [REDACTED]; [REDACTED]
<[\[REDACTED\]](mailto:[REDACTED])>
Subject: South Bank and Waterloo Neighbourhood Plan SEA and HRA Screening Assessments

Dear Natural England, Environment Agency and Historic England,

The London Boroughs of Lambeth and Southwark have undertaken an addendum to the initial SEA screening assessment of the draft South Bank and Waterloo Neighbourhood Plan. The addendum has been prepared on the proposed submission version of the South Bank and Waterloo Neighbourhood Plan. A review of the initial SEA screening report was considered necessary because of some changes to the proposed submission plan, most notably a new policy on air quality.

Thank you for your responses on the initial SEA screening assessment whereby all three statutory consultees agreed that there are unlikely to be significant effects of the Plan and therefore a full Strategic Environmental Assessment would not be necessary.

We again seek your views on the submission version South Bank and Waterloo Neighbourhood Plan and our addendum to the initial screening assessment. We consider that the inclusion of a new policy on air quality does not affect the conclusion of the initial screening assessment. We have also prepared a Habitats Regulations Screening Assessment on the neighbourhood plan that concludes the Appropriate Assessment stage is not required. Please see the following four attached documents:

1. Proposed submission version South Bank and Waterloo Neighbourhood Plan
2. Addendum to initial SEA screening assessment
3. Initial SEA screening assessment on pre-submission South Bank and Waterloo Neighbourhood Plan
4. Habitats Regulations Screening Assessment

Please could you provide your response by **Friday 27th October 2017**.

If you have any queries about the above documents, please do not hesitate to contact me.

Thanks and kind regards
Vanessa.

Vanessa Rodgers
Senior Planner
Planning, Transport and Development
Neighbourhoods & Growth
London Borough of Lambeth
Tel: 020 7926 1249
Email: VRodgers@lambeth.gov.uk
Web: www.lambeth.gov.uk

Phoenix House 1st Floor
10 Wandsworth Road
London SW8 2LL
Lambeth - a co-operative council

Find out more about our bid to be London's Borough of Culture at <http://love.lambeth.gov.uk/ourlambeth-launch/>

Disclaimers apply - full details at <https://www.lambeth.gov.uk/email-disclaimer>

This message has been scanned and no issues were discovered.
Click [here](#) to report this email as spam

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.