

# Highgate Neighbourhood Plan Strategic Environmental Assessment Post-Adoption Statement

## 1. Background

- 1.1. The Highgate Neighbourhood Plan ('the Plan') is a cross-borough plan for the Highgate Neighbourhood Area covering parts of the London Boroughs of Haringey and Camden.
- 1.2. The Plan was 'made' (i.e. adopted) by Haringey Council on 20th July 2017 following an independent examination and subsequent local referendum in which the Plan was supported by a majority of votes cast.
- 1.3. The Plan was developed over several stages in consultation with the respective Councils, statutory consultation bodies, key stakeholders and the local community. In parallel with the development of the Plan, a Sustainability Appraisal (SA) process was undertaken. This incorporated a Strategic Environmental Assessment (SEA) as required by the SEA Regulations<sup>1</sup>.
- 1.4. SA/SEA is a process by which a plan and its policies are appraised against a set of sustainability objectives. The purpose of the appraisal is to help ensure that potential significant adverse environmental, social and economic effects are identified and then avoided or mitigated, and to consider opportunities for improving expected outcomes in these areas.

## 2. Purpose of the SEA Adoption Statement

- 2.1. SA/SEA is undertaken as a series of stages in line with the requirements of the SEA Regulations and national planning guidance. The final step in the process involves the publication of a 'post adoption statement' following the formal making of the Highgate Neighbourhood Plan.
- 2.2. The statement should address the following:
  - An overview of the process that has been undertaken;
  - How environmental and sustainability considerations have informed and influenced the development of the plan, including consideration of reasonable alternatives;
  - Consultation that has been undertaken as part of the SA/SEA process; and
  - Proposed monitoring measures.
- 2.3. This report addresses each of the above matters in turn. Whilst the remainder of the report is divided into sections for practical reasons, it is acknowledged that there is some overlap on matters throughout these sections. The report should therefore be considered in its entirety for purposes of satisfying the relevant statutory requirements on post-adoption statements.

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<sup>1</sup> Environmental Assessment of Plans and Programmes Regulations 2004

### 3. Overview of the process that has been undertaken

3.1. SA/SEA was completed over a series of stages in parallel with the plan production process and key stages are summarised in the following table:

Date	Description
March 2015	The Councils publish a SEA Screening Opinion report, prepared in consultation with statutory consultation bodies. This concludes that SEA of the plan should be undertaken.
September 2015	A SA/SEA Scoping Report is published for consultation with statutory consultation bodies. Comments help inform the final scope of the SA/SEA for the plan.
January 2015	A pre-submission (Regulation 14) version of the plan is published for public consultation.
December 2015	A draft SA/SEA Environmental Report is published alongside a pre-submission (Regulation 14) consultation version of the plan.
August 2016	A SA/SEA Environmental Report – Regulation 16 Update is prepared. This is submitted to the Councils along with the final draft version of the Plan. These documents are subsequently publicised by the Councils for a (Regulation 16) public consultation.
April 2017	A SA/SEA Addendum is published by the Councils. This is an addendum to the SA/SEA Report Update, taking account of the Examiner’s recommended modifications to the Plan.

3.2. The SA/SEA Scoping Report helped to inform the setting of the SEA Framework, which comprised a list of objectives under themed topic areas against which the Plan and its policies were assessed throughout its preparation. The SEA Framework is included as Appendix A to this report for information.

3.3. A full draft SA/SEA Environmental Report (‘SA/SEA Report 2015’) was prepared and published alongside a ‘pre-submission’ consultation version of the neighbourhood plan. This provided a comprehensive assessment of the draft Plan including consideration of reasonable alternatives for several strategic policy issues. The findings helped to inform a review and further revisions to the Plan. The SA/SEA Environmental Report Regulation 16 Update (‘SA/SEA Report 2016’) was an amended version made to take account of changes to the Plan following consultation.

3.4. Through the public examination process a number of policy modifications were recommended to ensure the Plan met the ‘basic conditions’ for neighbourhood development plans. These modifications had not yet been through the SA/SEA process. An SA/SEA Addendum was therefore prepared to ensure due consideration was given to sustainability issues throughout the entirety of the plan process. This SA/SEA Addendum helped to inform the

Councils' respective decisions in the subsequent stages of the neighbourhood plan process.

#### 4. How SA/SEA has informed and influenced the Plan

4.1. SA/SEA has been undertaken as an iterative process to ensure that sustainability considerations have guided the neighbourhood plan making process. Policies have been developed in respect of both the SEA Framework and the Plan's "Core Objectives" (as set out in Section 2.2 of the Plan), both of which put sustainability considerations at the heart of decision making. The SA/SEA process has been particularly important in informing approaches in the light of reasonable alternatives on locally specific strategic policy matters. It has also helped identify the wider sustainability implications of the Plan, providing a basis from which to consider policy refinements and also reinforcing how the Plan will contribute to achievement of sustainable development in Highgate.

4.2. The Examiner's Report (paragraph 4.1) sets out that the relevant statutory requirements in respect of SEA/SA were satisfied through the plan process.

##### Reasonable alternatives

4.3. As noted above, one of the key elements in the SA/SEA process for the Plan was the consideration of 'reasonable alternatives' on strategic policy matters. On many policy areas the Plan was given to be taking a lead from, and providing a more nuanced approach to, the adopted and emerging policies in the Councils' respective Local Plans. It was not therefore considered necessary to consider alternatives on these policies. However, there were two key strategic policy areas where reasonable alternatives were considered as the Forum sought to explore more locally specific approaches – these were for economic activity and open space/public realm.

4.4. For these two policy areas the SA/SEA appraised a locally specific approach against a baseline approach (i.e. the established/emerging Local Plan position). Having regard to findings of the detailed appraisal of these options the Plan progressed with the locally specific policies. The approach on economic activity was incorporated into the adoption version of the Plan, and now provides for more nuanced approaches to managing town centre development within the neighbourhood area. However, the locally specific approach on open space/public realm was ultimately withdrawn in line with the Examiner's recommendations<sup>2</sup>.

4.5. Chapter 5 of the SA/SEA Report 2016 provides a detailed discussion of the various alternatives considered in the plan process, along with the reasons for focussing on the particular policy issues therein. Appraisals of the policy alternatives are set out in Appendices IV and V of the same report.

##### Policy appraisals

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<sup>2</sup> See Examiner's Report (paragraph 4.31) for further information.

4.6. In addition to 'reasonable alternatives' the Plan policies were appraised against the SEA Framework at various stages to help inform the final policies in the adoption version of the Plan. The SA/SEA was amended following feedback received at consultation. The majority of policies in the Plan appraised positively against the 12 sustainability objectives developed through the SA/SEA scoping process. Notably there were no policies which were expected to result in significant negative impacts. SA/SEA findings helped give assurance that the Plan would contribute positively on environmental, social and economic sustainability objectives.

## 5. Consultation

5.1. As summarised in Section 3 of this statement, the Plan and corresponding SA/SEA have been subject to multiple rounds of public consultation with responses informing the preparation of both documents.

5.2. An SA/SEA Scoping Report was published for consultation in 2015 with the statutory consultation bodies (Natural England, Environment Agency and Historic England). As paragraph 4.1.2 of the SA/SEA Report 2016 sets out, all comments received were taken into account and reflected in the SA/SEA scope. This report also states that the most substantive response was received from Natural England, highlighting biodiversity issues in relation to one of the proposed key site policies.

5.3. Two rounds of 'pre-submission' (Regulation 14) consultation were undertaken during 2015. The draft SA/SEA Report 2015 was published alongside a draft version of the Plan on the second round of consultation commencing in December 2015. Responses were received from statutory consultees, Camden and Haringey Councils and the wider public. Appendix VI of the SA/SEA Environmental Report 2016 provides a summary of the consultation feedback received and the Forum's response to this feedback in preparing the Plan and the SA/SEA at this stage of process.

5.4. The SA/SEA Report 2016 was prepared and submitted by the Forum to the Councils along with the final draft version of the Plan in September 2016. These documents were subsequently publicised by the Councils for a (Regulation 16) public consultation. Consultation responses were considered by the Examiner during the independent examination of the Plan.

5.5. In addition to the statutory stages of consultation set out above, the Forum also engaged with the local community and stakeholders on a number of informal consultation events and exercises throughout the preparation of the plan. This community engagement provided a further opportunity for the Forum to consider localised sustainability considerations. Further information is available in the Forum's "Consultation Statement" which was submitted to the Councils along with the final draft version of the Plan.

## 6. Monitoring measures

- 6.1. The SEA Regulations require that the significant environmental effects of the implementation the Plan should be monitored, and that the SEA Adoption Statement should provide information as to the measures that are to be taken to monitor these effects.
- 6.2. The final SEA/SA Report 2016 and Addendum (2017) highlighted the range of significant positive effects that had the potential to arise as a result of the implementation of the Plan, with no identified significant negative effects.
- 6.3. The SA/SEA Report 2016 (paragraph 9.10.1) concludes that whilst no significant negative effects are expected there are some “tensions and/or instances where additional policy might result in more positive effects in terms of specific objectives”. The report goes on to cite, as an example, the tension between maintaining Highgate’s local character and the objectives to support housing delivery. This underlines the need for a robust monitoring framework to help assess the extent to which sustainability objectives are being met.
- 6.4. Section 5 (Delivery and Monitoring) of the Highgate Neighbourhood Plan sets out the detailed framework for monitoring the effects of plan implementation. This framework addresses each of the key themed policy sections within the Plan and will supplement the Council’s Local Plan monitoring for the Highgate area. This will enable any locally significant effects to be identified over the plan period and inform appropriate interventions or contingency measures to be considered where monitoring highlights significant negative effects.
- 6.5. The Plan’s monitoring framework sets out a range of monitoring actions over the plan period, many of which are to be taken up by the Forum or local community organisations. The Council may periodically provide relevant information and updates through the annual Authority Monitoring Report process.

## 7. Useful links

- 7.1. For further information on the Highgate Neighbourhood Plan and to view the Plan and supporting documents, including the full complement of SA/SEA reports, please visit the following webpages:

[Haringey Council neighbourhood planning homepage](#)

[Camden Council neighbourhood planning homepage](#)

<http://www.highgateneighbourhoodforum.org.uk/>

## Appendix A – Highgate Neighbourhood Plan SEA Framework

SEA Topic	SEA Objectives
Air quality	1. Promote measures to reduce air pollution. 2. Promote sustainable transport use and reduce the need to travel.
Biodiversity	3. Protect, and where possible enhance, all biodiversity and geological features.
Climate change	4. Promote climate change mitigation in Highgate. 5. Support the resilience of Highgate to the potential effects of climate change.
Economy & Enterprise	6. Support and maintain a strong and sustainable community
Health & well-being	7. Promote the health and well-being amongst local residents
Historic environment & landscape	8. Protect, maintain and enhance Highgate's cultural heritage resources, including its historic environment and archaeological assets. 9. Protect and enhance the character and quality of landscapes / townscapes
Population, housing & community	10. Provide a range of types of housing including affordable housing, and a mix of dwelling sizes, types and tenures. 11. Cater for existing and future residents' needs as well as the needs of different groups of the community (e.g. younger persons)
Transport	12. Promote sustainable transport use and reduce the need to travel, especially using private cars.