

# Integrated Impact Assessment (IIA) and Habitats Regulations Assessment (HRA) of the Lewisham Local Plan

## Adoption Statement

June 2025

Quality information

Prepared by	Checked by	Approved by
Mark Fessey Associate Director	Ian McCluskey Associate Director	Nick Chisholm-Batten Technical Director

Prepared for:  
London Borough of Lewisham

Prepared by:  
AECOM Limited  
Aldgate Tower  
2 Leman Street  
London E1 8FA  
United Kingdom  
aecom.com

© 2025 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract with London Borough of Lewisham (the "Client") and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

## Table of contents

1	Introduction.....	1
2	The Plan-making / IIA ‘story’ .....	2
3	Measures decided concerning monitoring .....	4
4	Conclusions on the IIA process .....	5

# 1 Introduction

## 1.1 Background to the IIA

- 1.1.1 AECOM is leading on the Integrated Impact Assessment (IIA) process that is being undertaken alongside preparation of the Lewisham Local Plan. The IIA process aligns fully with the Sustainability Appraisal (SA) process that is a requirement for local plans and differs from SA only in terms of substantive focus. Specifically, IIA involves a focus on appraising the merits of the plan and alternatives in respect of equalities and health objectives, in addition to the sustainability objectives that are the focus of SA.
- 1.1.2 The formally required IIA Report was published alongside the final draft ('proposed submission') version of the Local Plan in 2022 under Regulation 19 of the Local Planning Regulations. The aim of the IIA Report, in accordance with regulatory requirements, was essentially to present an appraisal of "the plan and reasonable alternatives" and "an outline of the reasons for selecting the alternatives dealt with".
- 1.1.3 The Local Plan was then submitted to the Government for Examination in Public in November 2023 alongside the IIA Report and all representations received through the preceding Regulation 19 publication stage. The appointed Planning Inspectors then oversaw Examination Hearings, followed by publication of a Post Hearings Letter on 8<sup>th</sup> November 2024, which set out next steps.
- 1.1.4 The Council then consulted on Main Modifications to the Local Plan (as previously submitted) between February and March 2025, and an IIA Report Addendum was published alongside.
- 1.1.5 Most recently, the Inspectors' Report was published in June 2025, setting out that the plan is legally compliant and sound provided that a series of Main Modifications are made. These Main Modifications almost entirely align with those previously published for consultation in early 2025.
- 1.1.6 The next step is to move forward with formally adopting the Local Plan, and this IIA Adoption Statement aims to inform this step as well as to inform plan implementation.
- 1.1.7 Specifically, **this IIA Adoption Statement** aims to do two things:
  - 1) Explain the '**story**' of plan-making / IIA up to the point of adoption<sup>1</sup>
  - 2) Present measures decided concerning **monitoring**.
- 1.1.8 These two matters are considered in turn.

## 1.2 A brief statement on HRA

- 1.2.1 AECOM has also led on Habitats Regulations Assessment (HRA) for the Local Plan, with the most recent report published at the Main Modifications stage in 2025. This report concluded:
 

*"Following the analysis of the proposed Main Modifications to the Local Plan it can be concluded that they will not lead to likely significant effects on European sites, alone or in combination with other plans and projects, and do not undermine the conclusions of the HRA of the Local Plan. This is because all relevant European sites continue to be outside the zone of influence of development set out in the Local Plan and will therefore not be affected by modifications to the Local Plan."*
- 1.2.2 At the current time this statement holds true, as discussed further in Section 2.5, below. There is no need or requirement to present further information in respect of HRA at this stage.

---

<sup>1</sup> Specifically, there is requirement to: "summaris[e] how environmental considerations have been integrated into the plan...and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of...reasonable alternatives..."

## 2 The Plan-making / IIA ‘story’

### 2.1 Introduction

2.1.1 Key steps were as follows:

- Regulation 18 consultation (2020)
- Regulation 19 publication (2022)
- Main Modifications (2025)
- The Inspectors’ Report (2025)

### 2.2 Regulation 18 consultation (2020)

2.2.1 The Council consulted on a full Draft Local Plan in 2020 and an Interim IIA Report was published alongside. This was a voluntary step but nonetheless the Interim IIA Report aimed to present all of the information required of the formal IIA Report (which is required at the Regulation 19 stage).

2.2.2 The required information essentially amounts to presenting an appraisal of “the plan and reasonable alternatives” and “an outline of the reasons for selecting the alternatives dealt with” and the approach taken was to present this information across two ‘parts’ of the report:

- Part 1 – presented information on reasonable alternatives in the form of “growth scenarios” essentially comprising alternative approaches to the supply of land for development, including by allocating sites, in order to provide for development needs alongside delivering-on wider plan objectives.
- Part 2 – presented an appraisal of the Draft Local Plan.

### 2.3 Regulation 19 publication (2023)

2.3.1 The final draft ‘Proposed Submission’ version of the Local Plan was published under Regulation 19 in 2022 and the formally required IIA Report was published alongside.

- Part 1 – presented information on reasonable alternatives in the form of “growth scenarios”. Specifically, six growth scenarios were defined where: Scenarios 1 and 2 assumed no Bakerloo Line Extension (BLE); Scenarios 3 and 4 assumed only BLE Phase 1; and Scenarios 5 and 6 assumed BLE Phase 2. The scenarios involved incrementally increasing levels of development, ranging from support for ~33,000 homes in the plan period under Scenario 1 to ~38,000 homes under Scenario 6. Each the scenarios specified where growth would occur and the primary ‘variable’ growth location was Bell Green / Lower Sydenham, where three growth quanta were reflected across the scenarios (~1,600 homes under Scenarios 1 to 4; ~3,300 homes under Scenario 5 and ~4,900 homes under Scenario 6). The appraisal then found each of the scenarios to be associated with certain strengths and weaknesses.

LBL Officers then prepared a statement setting out their reasons for taking forward the preferred approach in light of the appraisal, although this statement was called into question during the subsequent Examination and was revisited within the IIA Report Addendum in 2025 (Appendix II of that report). In short, the preferred approach is to support Scenario 1 under a ‘no BLE’ scenario, but also to allow flexibility for higher growth at Bell Green / Lower Sydenham subject to BLE.

- Part 2 – presented an appraisal of the Draft Local Plan, concluding a ‘significant positive effect’ in respect of accessibility objectives, a ‘moderate or uncertain positive effect’ in respect of a range of sustainability objectives, an ‘uncertain effect’ in respect of economy objectives and a ‘moderate or uncertain negative effect’ in respect of climate change adaptation objectives. This appraisal conclusion was set out within Section 9.13 of the IIA Report and also within the accompanying IIA Report Non-technical Summary.

## 2.4 Main Modifications (2025)

- 2.4.1 A series of Main Modifications (MMs) to the Local Plan (as previously submitted) were agreed with the Inspectors following Examination Hearings and published for consultation in early 2025. An IIA Report Addendum was published alongside that primarily sought to present an appraisal of the MMs but also took account of the effect of the MMs in combination with wider aspects of the previously submitted Local Plan (i.e. those aspects not subject to modification) and, in doing so, sought to update the appraisal conclusions presented in Part 2 of the IIA Report.
- 2.4.2 The IIA Report did not present information on reasonable alternatives, with Section 3 explaining: *“At the current time, whilst there do remain some choices open to the Council / Inspectors, these are detailed choices relating to fine-tuning the approach to growth at certain site allocations and potentially fine-tuning certain thematic policies. It is sufficient and proportionate to explore these choices through the appraisal of MMs presented below (Section 4) as opposed to formally defining and appraising alternatives. Whilst alternatives could feasibly be defined – notably in respect of the capacity supported at certain site allocations – there is no confidence that these would be ‘reasonable’ in the sense that the appraisal would be able to reach meaningful conclusions in terms of differential significant effects.”*
- 2.4.3 The appraisal of MMs was presented in Section 4 of the report, with the conclusion as follows:
- Flood risk – this was a key issue that was a focus of the IIA Report (2022) and there is a need for ongoing scrutiny in light of the proposed MMs.
  - Climate change mitigation – there is a need to ensure that Policy SD3 is clear and aligns with latest understanding regarding good practice nationally. Heat networks must also remain a focus.
  - Economy – there is support for the MMs that deal with ensuring a targeted and carefully considered approach to the mixed use redevelopment of LSIS.
  - Housing – the proposed approach of boosting supply, particularly in the early years of the plan period, is strongly supported.
  - Transport, accessibility and air quality – there is broad support for the proposed changes, including in respect of a boost to capacity at Lewisham shopping centre.

## 2.5 The Inspectors’ Report (2025)

- 2.5.1 The Inspectors Report begins with a Non-technical Summary which lists out the final MMs that are needed in order to make the plan sound (such that it can be adopted). Key MMs are as follows:
- MMs to reflect the uplift to housing supply, an additional year of the housing requirement, and the revised housing trajectory;
  - MMs to ensure that the approach to affordable housing is in general conformity with the London Plan and to ensure that there is commitment to undertake an early review of the Plan in relation to Gypsies, Travellers and Travelling Showpeople;
  - MMs to clarify the employment floorspace requirement, substitute sites within the employment land hierarchy and remove the requirement for the provision of low-cost workspace from employment sites and, ensure there is a commitment to undertake an early review of the Plan in relation to retail and town centre requirements;
  - MMs to explain the role and significance of the various regeneration areas and to clarify the approach to areas which lie outside the regeneration areas;
  - MMs to clarify open space policy and make amendments to two parcels of Metropolitan Open Land.
- 2.5.2 These are all matters that were a focus of the preceding IIA Report Addendum. Whilst the final MMs do reflect some adjustments relative to those previously appraised and published for consultation, these adjustments are minor and do not have any significant bearing on the appraisal of MMs previously presented within the IIA Report Addendum. Neither do they have any bearing on the HRA conclusion previously presented in the report published at the MMs stage (as discussed in Section 1.2, above).
- 2.5.3 The Inspectors explain the final changes (i.e. changes to the previously published MMs) as follows:

*“The MMs were subject to public consultation over a six-week period. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.”*

2.5.4 With regards to the IIA, the Inspectors' Report concludes:

*“From all that we have read and heard, we are satisfied that the sustainability appraisal (as part of the IIA) provides an appropriate basis for us to assess the likely effects of the Plan having regard to reasonable alternatives.”*

2.5.5 Also, with regards to EqIA (undertaken alongside SA as part of IIA), the Inspectors' Report concludes:

*“The Council has carried out an Equalities Impact Assessment as set out at Appendix III of the IIA and its subsequent update [the IIA Report Addendum] to inform the preparation of the Plan. We have had due regard to the aims expressed in S149(1) of the Equality Act 2010 and we have considered how the Plan's policies are likely to affect persons with protected characteristics. This has included our consideration of several matters during the examination including different types of housing need including people with specific needs and the elderly, achieving sustainable and inclusive and safe design and improving town centres and access to infrastructure including by sustainable modes of transport.”*

2.5.6 With regards to HRA, the Inspectors conclude:

*“The submitted HRA, September 2022 sets out that after screening the policies, an appropriate assessment would not be necessary due to the intervening distances from the Borough boundary. The report was updated to assess the MMs and the conclusion remains unchanged.”*

2.5.7 Finally, the following is also of note given this matter was a key focus of work dating back to 2020:

*“The reasonable alternatives were based around 6 different alternative growth scenarios involving the BLE. The spatial strategy is based on Scenario 1 which assumes there would be no BLE during the Plan period. However, the Plan provides sufficient flexibility to embrace any additional uplift in housing through increased densities in the Bell Green area which may arise from the BLE line should Phase 1 come forward toward the latter part of the Plan period. It is clear from the IIA that any increase in growth above the baseline should only be alongside the BLE line in order to ensure sustainable development.”*

## 3 Measures decided concerning monitoring

3.1.1 With regard to monitoring the Inspectors Report explains:

*“Policy DM7 sets out the Plan's approach to monitoring and review involving a number of local performance indicators with the outcomes published annually in the Authority Monitoring Report. The policy is not precise as to what will be monitored and measured. This is addressed by MM328. Table 19.1 set out 58 local performance indicators. As submitted, there was a lack of focus on the key strategic matters necessary to assess the effectiveness of the Plan and a lack of clarity and consistency with the choice of measures, indicators and targets to be monitored. All of which would undermine the effectiveness of the monitoring to enable an objective assessment as to whether a full or partial review of the Plan was necessary. Accordingly, MM329 presents new explanatory paragraph and MM330 sets out a revised Table 19.1. These MMs are necessary to make the monitoring framework effective, justified and consistent with national policy.”*

3.1.2 The final decision on monitoring indicators was made in light of the recommendations set out in Section 11 of the IIA Report (2022), namely suggestions for the focus of monitoring to include: loss of light industrial land, potentially with a focus on the needs of specific types of business; development in a flood risk zone, and also potentially adjacent to the flood risk zone given uncertainty regarding future flood risk given climate change; and impacts to existing communities / groups within the population as a result of town and district centre regeneration and the redevelopment of existing industrial and mixed use employment sites. Not all of these recommendations have been fully reflected in the final monitoring framework, but this is a reflection of the need to carefully target monitoring efforts in light of resource constraints.

## 4 Conclusions on the IIA process

- 4.1.1 This Adoption Statement demonstrates that a legally robust IIA process was undertaken alongside plan-making, with appraisal findings and consultation responses feeding into decision-making at key junctures.
- 4.1.2 Most importantly, in terms of compliance with both the SEA Regulations<sup>2</sup> and Local Planning Regulations,<sup>3</sup> the IIA Report was published for consultation alongside the Proposed Submission Local Plan in 2022, presenting an assessment of “the plan and reasonable alternatives”, and this assessment served to inform representations and subsequent plan finalisation.
- 4.1.3 This Adoption Statement is the final step in the IIA process. Its aim is to explain the ‘story’ of the plan-making / IIA process, and also present measures decided concerning monitoring. Table 4.1 serves to demonstrate that this Adoption Statement presents the required information.

**Table 4.1: Regulatory checklist**

The Adoption Statement must...	Information presented above
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	<p>This Statement has sought to provide examples of key sustainability considerations that have been highlighted through assessment and consultation and, in turn, integrated into the plan-making process.</p> <p>First and foremost, the relative merits of reasonable alternatives were appraised in terms of a range of environmental and wider sustainability issues/objectives, with a view to informing decision-making.</p>
Summarise how the IIA Report and consultation responses received, as part of the Draft Plan / IIA Report consultation, have been taken into account when finalising the plan.	<p>This Statement seeks to explain a stepwise process over time. It was naturally the case, at each step in the process, that account was taken of all available evidence including consultation responses received.</p> <p>Further information on consultation responses received through Local Plan / IIA consultations is presented within the Regulation 22 Consultation Statement (2023), which was submitted to the Local Plan Examination as PD09.</p>
Summarise the reasons for choosing the plan as adopted, in the light of reasonable alternatives.	<p>Reasonable alternatives were defined and assessed in 2020 in order to inform decision-making ahead of consultation, with officers providing a response to the assessment, equating to the Council's reasons for supporting the preferred option.</p> <p>This process was then repeated in 2022.</p>
Summarise the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan	See Section 3

<sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>3</sup> Town and Country Planning (Local Planning) (England) Regulations 2012