Sustainability Appraisal (SA) of Bromley’s Proposed Submission Draft Local Plan

SA Report
Non-technical Summary

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Non-technical Summary of the SA Report published alongside Bromley’s Proposed Submission Draft Local Plan

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Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Bromley Borough Local Plan. Once adopted, the plan will establish a spatial strategy for growth and change up to 2030, allocate sites and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA for Local Plans is a legal requirement, in-line with the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, Bromley’s Proposed Draft Local Plan is published in-line with Regulation 19 of the Local Planning Regulations, and the ‘SA Report’ is published alongside. The SA Report aims to inform representations, and subsequent plan-making work (see the discussion of ‘next steps’, below).

This is a Non-technical Summary (NTS) of the SA Report.

Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
   - i.e. in the run-up to preparing the Proposed Submission Plan.

2. What are the appraisal findings at this current stage?
   - i.e. in relation to the Proposed Submission Plan.

3. What are the next steps?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question ‘What's the scope of the SA?’

What’s the scope of the SA?

The scope of the SA is essentially reflected in a list of sustainability objectives. Taken together, these objectives (which are grouped under ten topic headings) indicate the parameters of SA, and provide a methodological ‘framework’ for appraisal.
### Table 1: Sustainability objectives (the SA framework)

<table>
<thead>
<tr>
<th>Topics</th>
<th>Objectives</th>
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| **Biodiversity**                | - The Borough’s existing natural assets should be protected from the impacts of future development and enhanced; in particular for areas that are home to declining species or habitats.  
- Bromley’s network of green infrastructure should be protected, enhanced and strategically expanded to deliver benefits for people and wildlife. |
| **Climate change mitigation**   | - There is a need to improve the energy efficiency of the Borough’s housing stock to reduce domestic GHG emissions.  
- Development should be designed and constructed in order to minimise resource use and to maximise the opportunities for reuse and recycling.  
- A shift towards low-carbon and congestion reducing forms of transport will be required in order to reduce transport related emissions.  
- The Borough should aim to generate a greater proportion of energy from renewable sources. |
| **Community and well-being**   | - There is a need to provide services and suitable accommodation for older people as the population aged over 85 in Bromley.  
- Housing affordability is a significant issue for many in Bromley (and London general) with demand for affordable housing set to continue to rise.  
- Gypsy and Traveller communities are in need of enhanced access to services and healthcare.  
- The Borough is relatively affluent however it has high levels of inequality with some areas suffering from the highest levels of deprivation. There is a particular need to reduce health inequalities in these areas.  
- There is a need to improve levels of educational performance in certain areas of the Borough; and as the number of young people grows there will a need to ensure that there is sufficient provision of education facilities across the Borough.  
- Better access to public transport is required in the more rural areas of Bromley, and greater accessibility to London via public transport is necessary across the Borough.  
- Improved open spaces and recreation facilities are a requirement in certain areas. A particular focus should be on youth facilities in many places.  
- Give due regard to promoting equality of opportunity for all protected groups, e.g. the elderly. |
| **Economy**                     | - The plan should promote investment to develop high value employment activities that support a knowledge-based economy in Bromley  
- There is a need to improve the competitiveness of key employment centres, in particular by improving the quality of the office stock in Bromley’s town centres.  
- The plan should maximise the employment and business opportunities available at Biggin Hill in light of its designation as a Strategic Outer London Development Centre.  
- There is a need to protect and support smaller centres, shops and shopping parades. |
| **Landscape, townscape and cultural heritage** | - Landscape character should be protected, in particular that associated with areas of Green Belt and North Kent Downs AONB.  
- Urban areas and buildings that contribute the most to urban character should be protected.  
- The Borough’s Heritage Assets should be protected and enhanced. |
| **Water, flood risk and other climate change adaptation issues** | - Action is needed to reduce the risk of flooding, particularly given increased risks associated with climate change.  
- Water quality is a concern in the Borough, with efforts needed to improve the ecological status of waterways.  
- Given the Borough’s position in an area of severe water stress, water efficiency measures should be sought. |
PLAN-MAKING / SA UP TO THIS POINT

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.

As such, Part 1 of the SA Report explains how work was undertaken to develop and appraise alternative approaches to housing growth (‘alternative spatial strategies’). Specifically, Part 1 of the report:

1) Explains the process of establishing reasonable alternatives;
2) Presents the appraisal of the reasonable alternatives; and then
3) Gives the Council’s response to the alternatives appraisal findings.

Developing reasonable alternatives

SA work commenced in early 2013, when AECOM (then URS) worked with the Council to establish alternatives for a range of the policy areas / issues set to be addressed through the Local Plan. Ultimately, alternatives were established for 18 issues in 2013, and each set of alternatives was subjected to appraisal at the time of the ‘Options and Preferred Strategy’ consultation, with findings presented within an Interim SA Report.

Subsequent to the 2013 consultation the Council was able to take into account alternatives appraisal findings (plus consultation responses received on the alternatives) when preparing the ‘Draft Policies and Designations’ consultation document. Furthermore, in the run-up to finalising the consultation document in 2014 the opportunity was taken to update the alternatives appraisal findings - in relation to the 18 plan issues identified in 2013 - to account for newly emerged evidence. Updated alternatives appraisal findings were then reported within the Interim SA Report published alongside the ‘Draft Policies and Designations’ consultation document in February 2014.

In 2015, the Council and AECOM worked together to develop spatial strategy alternatives, in recognition of the fact that it is the spatial strategy - i.e. the approach to site allocations - that is the key issue at the heart of the plan. It is that which generates the most interest, and (in the view of AECOM) that most likely to result in ‘significant effects on the sustainability baseline’.

It was determined that there is a ‘reasonable’ need to appraise two alternative housing quantum figures: one that would involve delivering the London Housing Plan target of 641 dpa; and another that would involve delivering a higher figure.

In terms of spatial distribution, the preferred strategy would seem broadly appropriate for delivering 641 dpa, but under a higher growth scenario it seems reasonable to consider a slightly modified strategy; specifically, one whereby housing is focused to a greater extent at the Borough’s strategic growth areas.

Ultimately, two reasonable spatial strategy alternatives were established:

1. London Plan target as a minimum, delivered in-line with the preferred spatial strategy (i.e. the Council’s preferred option)
2. Higher growth strategy, with additional housing focused at the Borough’s strategic economic growth areas.

It was not possible to define the specific additional sites (i.e. sites over and above those proposed allocations presented within the current consultation document) that would be delivered under option 2, but it was assumed that they would be selected from the pool of site options that have been subjected to appraisal by the Council - see Figure 1 below.
Figure 1: Housing site options within Bromley - showing the Council’s preferred sites and those that could potentially come into contention under a higher housing growth scenario.
Summary alternatives appraisal findings

Summary appraisal findings are presented within Table 2. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using red / green) and also rank the alternatives in relative order of performance. Also, ‘ ’ is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

**Table 2: Summary spatial strategy alternatives appraisal findings**

<table>
<thead>
<tr>
<th>Topic</th>
<th>Rank of performance / categorisation of effects</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Option 1</td>
</tr>
<tr>
<td></td>
<td>London Plan target as a min – delivered in-line with the preferred spatial strategy</td>
</tr>
<tr>
<td>Air quality</td>
<td>1</td>
</tr>
<tr>
<td>Historic Environment</td>
<td>1</td>
</tr>
<tr>
<td>Housing</td>
<td>2</td>
</tr>
<tr>
<td>Land</td>
<td>2</td>
</tr>
<tr>
<td>Landscape</td>
<td>1</td>
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<tr>
<td>Transport</td>
<td>1</td>
</tr>
</tbody>
</table>

Looking across the appraisal findings it is clear that **Option 1** [London Plan target] ranks highest in a number of respects, namely in terms of biodiversity, climate change mitigation, landscape, townscape, and flood risk. By meeting the minimum target for housing delivery target set by the Further Alterations to the London Plan (2015), this option should also lead to significant positive effects in terms of community and wellbeing, including on the basis that it would support regeneration within the Borough’s renewal areas.

The pursuit of **Option 2** (higher growth) could lead to greater negative effects in terms of biodiversity, climate change mitigation, landscape, townscape, and flood risk, given the likelihood of additional land take. However, these impacts could be reduced through a balanced spatial strategy, with housing density increased in suitable areas (e.g. through a review of the Bromley Town Centre AAP) and areas of designated open space (UOS/ MOL and Green Belt) carefully selected. Where negative impacts cannot be avoided through such a spatial strategy, mitigation measures could be utilised, such as the restoration of wildlife features or the installation of Sustainable Drainage Systems (SuDS). Importantly, by exceeding the FALP 2015 minimum target through a balanced spatial strategy and mitigation measures, **Option 2** would be likely to deliver significant positive effects in terms of addressing the Borough’s need for new and affordable housing, and its economic growth ambitions in the SOLDCs, at Cray Valley and within Bromley Town Centre.
The Council’s response / justification for the preferred approach

The following text is in the form of a general discussion of the reasoning and justification behind the preferred option, which is Option 1.

The Council considers that Option 1 is the more sustainable strategy given the likely adverse impacts that would arise from a higher growth option proposed through Option 2.

Paragraph 14 of the NPPF states that:

“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted”.

The footnote to Para 14 gives examples of such restrictive policies including Green Belt and Local Green Space.

In turn, the London Plan reflects the NPPF - whilst it encourages boroughs to exceed their annual housing supply targets, it also contains policies to protect open space and the natural environment.

The Council’s strategy has been to protect open space wherever possible, but it has agreed some change to provide for needs which are not able to be met elsewhere, notably for Traveller sites (in accordance with central government policy), for education land (in order to meet identified local needs) and at Biggin Hill Airport (to allow airport related economic growth). The evidence base shows exceptional circumstances exist in these cases – i.e. there are no other reasonable alternatives and that the harm caused by the changes is demonstrably outweighed by the benefits.

In terms of housing, the Council demonstrates, through its housing trajectory, that it can meet the annual London Plan housing target (with a buffer included) over the life of the plan. Achieving a higher target (and proving deliverability) would require additional land allocations and the release of either designated industrial land or open space (or both) – which is contrary to the Council’s overall strategy.
APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the SA Report answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the Proposed Draft Local Plan. Appraisal findings are presented under ten Sustainability Topic headings (see Table 1, above), with each narrative ending in a concluding paragraph. The ten concluding paragraphs are repeated here.

**Biodiversity**

The policies in the plan offer a high level of protection for designated and non-designated sites of biodiversity importance and seek to improve provision where possible. Whilst some allocations and identified areas for strategic growth contain or are in close proximity to designated biodiversity, including SINC and SSSI, the most sensitive areas of the Borough are avoided and there is suitable mitigation provided through Draft Local Plan policies.

Employment growth is planned at Biggin Hill and the Cray Valley Business Corridor which are within close proximity to a SSSI, a SINC, and Ancient Woodland. Intensification at these sites has the potential to lead to negative effects; however other policies set out in the ‘Bromley’s Valued Environments’ chapter, including: Draft Policies 68 Development and SSSI, 69 Development and Nature Conservation Sites, 71 Additional Nature Conservation Sites, should mitigate these effects sufficiently.

On balance, it is appropriate to conclude neutral effects at this stage for the Draft Local Plan as a whole, i.e. it is not possible to conclude positive or negative effects on the baseline. Development proposed in the Draft Local Plan combined with development proposed in surrounding Local Authorities could have a cumulative effect on biodiversity; however, the nature and significance of this effect is uncertain at this stage. Negative cumulative effects are most likely to arise as a result of the fragmentation of habitats and ecological corridors as well as increased atmospheric pollution. The mitigation provided through Local Plan policies and available at the project level should ensure that cumulative negative effects are not of significance.

Conversely, there is also the opportunity for development to have cumulative positive effects through the enhancement of habitats and provision of green infrastructure. Where possible, any opportunities to enhance biodiversity either within the Borough or across Local Authority boundaries should be explored.

**Climate Change Mitigation**

The plan performs favourably on the basis that the spatial strategy should help to reduce the need to travel/support more sustainable transport, and policy is in place requiring development to contribute to moving waste up the waste hierarchy and facilitate low carbon heating / electricity and energy efficiency. Average household energy use and emissions should decrease as a result of these policies. This should lead to positive effects in terms of climate change mitigation.

There are, however, possible draw-backs in that Biggin Hill is perhaps less than ideal given poor public transport accessibility. If transport-related emissions are to be reduced then investment in public transport will be required that links existing communities and new housing with employment growth at Biggin Hill.

On balance, it is appropriate to conclude neutral effects at this stage for the Draft Local Plan as a whole, i.e. it is not possible to conclude positive or negative effects on the baseline. When the Draft Local Plan is considered in-combination with development proposed in the surrounding areas of the Borough there is the potential for a cumulative negative effect as a result of increased GHG emissions. However, this is not likely to be of significance as proposed development should help to reduce the need to travel and improve access to sustainable modes of transport. The incorporation of low carbon heating/ electricity and energy efficiency in new development should also help to mitigate the significance of any residual negative effect.

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1 In relation to climate change mitigation, there is very little potential to conclude that a Local Plan will result in significant effects, recognising the climate change mitigation is a global issue.
Community and Well-being

The Spatial Strategy seeks to direct housing development and employment growth to accessible locations and use development to improve access in areas of deficiency. The approach to increasing housing provision should lead to improved affordability, flexibility to allow for extensions and subdivisions and change of use to accommodate new dwellings for market housing and also provide additional housing for older people. The preferred approach will also help to meet the education needs of the Borough, which is identified as a key and ongoing issue for communities. The approach should encourage healthy lifestyles through active transport and access to leisure facilities and open space. The policies in the ‘Supporting Communities’ chapter should result in improvements to community infrastructure and investment in public transport.

In terms of equalities, the preferred approach will have positive effects as it will help to meet the needs of all residents and visitors. Increasing accessibility to affordable housing will have significant benefits as affordability is a significant barrier to greater equality within the Borough. The preferred approach supports equal access to facilities and services for existing communities and in new developments.

The combination of the above factors means that the Draft Local Plan as a whole is likely to result in significant positive effects in terms of community and wellbeing. There is also likely to be significant cumulative positive effects when the Draft Local Plan is considered in combination with the delivery of new housing and associated community infrastructure proposed in surrounding areas.

Economy

Overall, the approach seeks to match employment growth with housing growth which is likely to have positive effects in terms of the economic growth objectives. The exception to this is Biggin Hill, which is in a relatively isolated part of the Borough; however growth here aims to achieve specific aviation and high-tech industry objectives, and accords with the London Plan SOLDC designation. Also of note is the policy of focusing growth at ‘Renewal Areas’, where proposals will be required to ‘make a positive contribution to the vitality of local centres having regard for their importance as providers both of local facilities and local employment.’

A number of the policies included in the ‘Working in Bromley’ chapter seek to protect retail uses in town centres, from the Metropolitan level down to the neighbourhood level. However the policy is flexible in that should there be no market demand for these uses, the policy would allow a change to alternative uses. This approach should help to maintain the vibrancy and vitality of the Borough’s town centres and have a long-term positive effect.

Also of note are policies that seek to improve the supply of quality office space. Employment growth in high-tech and office jobs should lead to the creation of additional high-value employment in the Borough.

Overall, the Draft Local Plan as a whole should lead to significant positive effects, including through improving the competitiveness of employment centres; protecting and enhancing smaller centres, shops and parades; delivering additional employment and high-value employment; and making the best use of employment opportunities at Biggin Hill. There is potentially an issue in that new transport links between Bromley and Canary Wharf could give rise to increases in out-commuting; however, it is not clear that this would be to the detriment of the local economy.

There is also the potential for significant positive cumulative effects on the wider economy when the Draft Local Plan is considered in combination with the delivery of new employment and associated infrastructure improvements proposed in the surrounding areas.
Landscape, Townscape and Cultural Heritage

The policy of restricting development in the Green Belt except in very special circumstances should help to preserve landscape character. Similarly Draft Policy 76 (Kent Downs Area of Outstanding Natural Beauty) will seek to protect the AONB from development that might potentially have a detrimental impact. Together these policies should have a positive effect in terms of protecting the Borough’s landscape character.

The spatial strategy seeks to focus development in-line with the settlement hierarchy which could potentially result in negative effects on Conservation Areas and listed buildings; however, a number of the policies require proposals to demonstrate a high standard of design that takes into account landscape, townscape and cultural heritage assets. These policies should provide a good level of protection to designated assets in the Borough.

Development at the Biggin Hill SOLDC should enable the restoration and maintenance of historic assets in the Conservation Area which is identified as being ‘at risk’. Policy requires development to ‘sensibly re-use heritage assets’ while allowing flexibility for some demolition where re-use is not feasible and/or redevelopment is needed to deliver a viable development solution for the site. By seeking to retain and restore as many of the heritage assets as possible, this approach is expected to enable redevelopment at Biggin Hill where there is currently the potential for all assets to be lost due to neglect and disrepair. The policy is therefore expected to have a positive effect overall.

The preferred approach for meeting the education needs of the Borough reflects the lack of opportunities for expansion of existing education facilities. While the preferred approach will result in the re-designation of existing school sites from Green Belt and Metropolitan Open Land to Urban Open Space this is not likely to be of significance for landscape, townscape or heritage given the urban character of the Borough. It is also important to remember that there are no other reasonable alternatives for meeting the education needs of the Borough during the life of the plan.

Taken together the policies in the Plan should enable growth to be accommodated while the landscape, townscape and cultural heritage of the Borough is maintained and enhanced. Consequently, significant positive effects in terms of the landscape, townscape and cultural heritage topic are predicted for the Draft Local Plan as a whole. At this stage the cumulative effects are uncertain; however, in line with the NPPF development within the borough and in the surrounding areas should protect and enhance valued landscapes and heritage assets.

Water, Flood Risk and other Climate Change Adaptation Issues

It is critical that new development in the Borough does not lead to increased flood risk. The most effective way of managing future flood risks is to reduce exposure. Policy on flood risk recognises this, and is set to require development in Flood Risk Areas to seek opportunities to deliver a reduction in flood risk compared with the existing situation.

Several of the Development Management policies should further help to reduce flood risk in the Borough. Policy on SUDS should reduce surface runoff rates and increase infiltration thus lowering the risk of flooding. This effect will be enhanced by policy on backland and garden development. Taken together these policies are expected to have significant positive effects in terms of flood risk.

Policies aimed at protecting/enhancing green corridors and local green space should help contribute towards mitigating the urban heat island effect through providing vegetation that cools the environment and provides shade, thus having positive effects in terms of climate change adaptation, and are also a positive from a flood risk perspective.
Finally, policy on sustainable design and construction should help to ensure efficient use of natural resources, including water, efficiently. However, it is noted that the policy on parking is less than ideal from a water quality and flood risk perspective. It is recommended that the policy should be revised to include a maximum level of parking provision and to include a requirement for the use of permeable material in parking areas. This would help to reduce runoff rates and increase infiltration, thereby preventing increased flood risk.

On balance, it is appropriate to conclude neutral effects at this stage for the Draft Local Plan as a whole, i.e. it is not possible to conclude positive or negative effects on the baseline. Cumulative effects are most likely to arise as a result of increased demand for water resources. The incorporation of water efficiency measures in new development should help to mitigate the significance of this effect; however, ultimately water companies have a legal duty to ensure enough water is available to meet customers’ needs.
Next steps


Plan finalisation

Subsequent publication of the Proposed Submission Draft Local Plan, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be ‘sound’. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

If found to be ‘sound’ the plan will be formally adopted by the Council. At that time an ‘SA Statement’ must be published that sets out (amongst other things) ‘the measures decided concerning monitoring’.

Monitoring

At the current time, there is a need only to present ‘measures envisaged concerning monitoring’.

The draft plan document includes a range of proposed monitoring indicators in Appendix 1. The table below lists a selection of the Council’s proposed measures, as well as any wider monitoring measures, that are of particular importance given the findings of the appraisal.

*Table 3: A selection of the Council’s proposed monitoring indicators*

<table>
<thead>
<tr>
<th>Sustainability topic</th>
<th>Proposed indicator of note (given appraisal findings)</th>
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<tbody>
<tr>
<td><strong>Biodiversity</strong></td>
<td>• Change in Green Belt land (ha)</td>
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<td></td>
<td>• Change in Metropolitan Open Land (ha)</td>
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<tr>
<td></td>
<td>• Change in Urban Open Space (ha)</td>
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<td></td>
<td>• Change in Local Green Space</td>
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<td></td>
<td>• Number of developments demonstrating economic, social or environmental benefits</td>
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<tr>
<td><strong>Community and well-being</strong></td>
<td>• Net additional/improved sport and recreation facilities (School provision and public accessible)</td>
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<tr>
<td></td>
<td>• Provision of new homes</td>
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<tr>
<td></td>
<td>• Number of affordable Homes</td>
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<tr>
<td></td>
<td>• Number of units of specialist housing for older people</td>
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<tr>
<td></td>
<td>• Number of developments demonstrating economic, social or environmental benefits</td>
</tr>
<tr>
<td></td>
<td>• Number of Traveller pitches/plots</td>
</tr>
<tr>
<td></td>
<td>• % of residential applications where education contributions are sought successfully</td>
</tr>
<tr>
<td></td>
<td>• New permanent &quot;Forms of Entry&quot; provided</td>
</tr>
<tr>
<td></td>
<td>• Completion of public realm projects (as outlined in the IDP)</td>
</tr>
<tr>
<td></td>
<td>• Completion of transport projects (as outlined in IDP)</td>
</tr>
<tr>
<td><strong>Landscape, townscape and cultural heritage</strong></td>
<td>• Number of listed buildings demolished/ part demolished</td>
</tr>
<tr>
<td><strong>Climate change mitigation</strong></td>
<td>• Major developments meeting and exceeding carbon reduction targets, and monies from the carbon off-setting fund spent on local projects</td>
</tr>
<tr>
<td></td>
<td>• Capacity of renewable energy installations incorporated into major</td>
</tr>
<tr>
<td>Sustainability topic</td>
<td>Proposed indicator of note (given appraisal findings)</td>
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<td>----------------------------------------------------------</td>
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<tr>
<td></td>
<td>developments</td>
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<tr>
<td></td>
<td>• Increased use of decentralised energy networks</td>
</tr>
<tr>
<td>Economy</td>
<td>• Number of developments demonstrating economic, social or environmental benefits</td>
</tr>
<tr>
<td></td>
<td>• Change in B-Class floorspace in Strategic Industrial Locations (sqm)</td>
</tr>
<tr>
<td></td>
<td>• Change in B Class floor space within locally significant industrial sites (sqm)</td>
</tr>
<tr>
<td></td>
<td>• Number of vacant retail units (by centre)</td>
</tr>
<tr>
<td></td>
<td>• Footfall (by centre)</td>
</tr>
<tr>
<td></td>
<td>• Completion of transport projects (as outlined in IDP)</td>
</tr>
<tr>
<td>Water, flood risk and other climate change adaptation issues</td>
<td>• Major applications with Sustainable Urban Drainage Systems, and S106 agreements for drainage and flood risk infrastructure</td>
</tr>
</tbody>
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