Sustainability Appraisal Note – June 2024

The Sustainability Appraisal (SA) is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including 'equalities' and 'health' issues), with a view to avoiding and mitigating adverse effects and maximising the positives.

It is a requirement that an SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.3 2.1.2.

In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan. More specifically, the SA Report must answer the following three questions:

- i. What has Plan-making / SA involved up to this point? Including with regards to consideration of 'reasonable alternatives'.
- ii. What are the SA findings at this stage? I.e. in relation to the draft plan.
- iii. What happens next? What steps will be taken to finalise the plan? What measures are proposed to monitor plan implementation?

A draft Sustainability appraisal (SA) was completed on the proposed updates to the EAP, published for consultation in January 2023. The Assessment can be viewed here. It assessed options which reflected varying levels of development as follows:

Issue 1: Approach to level of growth targets

- Option 1a) Whether to leave growth according to Local Plan and previous EAP figures.
- Option 1b) Whether to decrease growth to align with site constraints.
- Option 1c) Whether to increase growth above previous EAP levels.

Issue 2: Approach to land use depending on capacity and viability and building heights

- Option 2a) Whether to leave land uses and building heights as shown in 2015 EAP.
- Option 2b) Whether to show additional heights specified to allow for additional capacity within LVMF.
- Option 2c) Whether to show additional heights beyond LVMF.

The SA published in 2023 found that the proposed updates to the EAP will deliver broadly positive sustainability effects and that the proposed area-based principles will mostly deliver positive benefits in sustainability terms against the relevant sustainability objectives.

The Council plans to carry out a supplementary consultation related to the Euston Area Plan, providing a 'direction of travel' update in response to the changes and uncertainty following the Government's recent announcements regarding HS2. This consultation is an additional exercise to the January 2023 consultation and all responses to the 2023 consultation will be considered alongside responses to this. The Euston Area Plan will also need to respond to any future Government plans for Euston.

This additional consultation is not proposing changes to the policy approach set out in the proposed updates to the EAP published for consultation in January 2023, as there are still many issues to be resolved. In reviewing the limited information that is available, we think that many of the issues at Euston remain broadly the same, as do our aspirations for the area, however there are some details that we understand may change and we have tried to highlight these where possible, based on our understanding and interpretation of a variety of potential scenarios. The consultation is seeking views on possible changes and also highlights and asks for views on proposals for specific site allocations.

The proposed updates published for consultation in January 2023 are based on a range of scenarios including varying levels of development work. These scenarios have not broadly changed and are considered relevant for this upcoming consultation as they reflect varied approaches responding to site constraints, including different sized stations. Therefore, as part of this review, we have reviewed the SA undertaken in January 2023 but have judged the options assessed reflect scenarios considered and therefore this has not been altered at this stage.

As more information becomes available the EAP will continue to be updated based on reasonable assumptions, setting out clear objectives and ambitions. The submission draft of the EAP may also be updated to reflect forthcoming decisions around the stations. When these are known, it may be necessary to assess the reasonable alternatives through the SA process.

There will be further consultation on a revised version of the draft Plan prior to submission for independent examination (further consultation is currently expected in Winter 24/25 with submission for examination in Spring/Summer 2025) and the Sustainability Appraisal will be updated to assess any changes in approach, to consider reasonable alternatives once known and to provide an assessment using the latest available data, policies and frameworks as appropriate.