



London Borough of Tower Hamlets

# Integrated Impact Assessment Accompanying Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Regulation 19 Draft Local Plan

Report for Consultation - Appendices



September 2017

Amec Foster Wheeler Environment  
& Infrastructure UK Limited



## Report for

Philip Wadsworth  
Strategic Planning – Local Plan Team Leader  
London Borough of Tower Hamlets  
Corporate Director of Development & Renewal  
London Borough of Tower Hamlets  
PO Box 55379  
Mulberry Place  
London  
E14 2BG

## Main contributors

Pete Davis  
Sean Nicholson  
Duncan Smart  
Daniel Caparros Midwood

## Issued by

  
.....  
Sean Nicholson

## Approved by

  
.....  
Pete Davis

## Amec Foster Wheeler

Gables House  
Kenilworth Road  
Leamington Spa  
Warwickshire CV32 6JX  
United Kingdom  
Tel +44 (0) 1926 439 000

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## Document revisions

No.	Details	Date
1	Draft for comment	August 17
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## Appendix A

### Results of Scoping Exercise



**Appendix A: Response to consultation comments on the Sustainability Appraisal Scoping Report and Regulation 18 Local Plan**

<b>SCOPING REPORT</b>	
<b>Consultation Comments</b>	<b>LBTH Response</b>
<b>Heritage England</b>	
<ul style="list-style-type: none"> <li>Include a specific SA objective which states: "conserve and enhance the historic environment, heritage assets and their settings".</li> </ul>	<ul style="list-style-type: none"> <li>SA Objective 10 has been changed to better reflect Historic England's guidance and the NPPF's wording.</li> </ul>
<b>Environment Agency</b>	
<ul style="list-style-type: none"> <li>Until updated LBTH Strategic Flood Risk Assessment is completed, include current LBTH level 1 SFRA (2009) and level 2 SFRA (2012) in the list of local plans.</li> <li>Reference the updated Thames RBMP</li> <li>Use the latest data regarding chemical and biological water quality in watercourses</li> <li>Further information regarding per capita or household consumption of daily water use and water availability and the classification of water stressed areas are available.</li> <li>Recommend referencing of 'Model procedures for the management of land contamination (CLR11)'</li> </ul>	<ul style="list-style-type: none"> <li>Appendix A has been updated</li> <li>Appendix A has been updated</li> <li>Appendix B has been updated</li> <li>Appendix B has been updated and a draft policy promoting sustainable water use has been incorporated as a new element of the Water and Flood Risk Policy</li> <li>Appendix A has been updated</li> </ul>
<b>Natural England</b>	
<ul style="list-style-type: none"> <li>Baseline indicators should make reference to the relevant National Character Area (NCA) profile.</li> <li>Consider the relevant 'shoreline management plan' or equivalent document in recognition of the borough's flood risk categorisation</li> <li>SA should consider the potential for significant effects on European Sites the impact on Sites of Importance for Nature Conservation (SINCs) of the expected high level of growth in employment and homes.</li> <li>Policies should address the spread of invasive non-native species.</li> <li>The SA should better reflect the All London Green Grid and stress the multi-functional nature of green infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Appendix A has been updated</li> <li>No action, as the following Shoreline Management Plans / Equivalent have already been included in the scoping document: <ul style="list-style-type: none"> <li>Thames Region Catchment Flood Management Plan, 2009</li> <li>River Basin Management Plan, Thames River Basin District, 2015</li> <li>Thames Estuary 2100 Action Plan: Managing Flood Risk Through London and the Thames Estuary, 2012</li> </ul> </li> <li>The HRA screening will review the potential for likely significant effects on European sites and any significant effects</li> </ul>

<ul style="list-style-type: none"> <li>• Recommend an SA/SEA approach which improves the condition of sites (SINCs and LNR) and species, including by linking and buffering consistent with the All London Green Grid principles.</li> <li>• Recommend an SA/SEA approach which tests the local plan's proposals for negative impacts on SINCs, LNRs, All London Green Grid components and species.</li> <li>• The monitoring provision for the local plan should be flexible in order to respond to changes in the evidence base.</li> <li>• Promote 'living buildings technology'.</li> <li>• SA and SEA work should focus on the significant positive opportunities that the All London Green Grid offers for policy formulation.</li> </ul>	<p>on other non-designated sites will be considered against the biodiversity objective within the SA.</p> <ul style="list-style-type: none"> <li>• A draft policy preventing the planting of invasive, non-native species has been included.</li> <li>• The All London Green Grid will be reflected in the IIA. In addition Tower Hamlets has its own Green Grid Strategy which will also help inform policies.</li> <li>• The current Local Plan policy (which is proposed to be retained) already prompts buffering for sites adjacent to SICs</li> <li>• The SA Framework will have additional criteria to guide the assessment of potential effects on local nature conservation designations and protected species</li> <li>• This will be considered when monitoring framework developed</li> <li>• A draft policy which retains and enhances requirements for living building elements has been included.</li> <li>• The All London Green Grid will be referenced. In addition Tower Hamlets currently has its own Green Grid Strategy – which forms part of the evidence base for current Green Grid Policy in the Local Plan.</li> </ul>
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Consultation Comments	Response
<p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>Historic England recently published HEAN 8 which provides guidance on Sustainability Appraisal and Strategic Environmental Assessment:  <a href="https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/">https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/</a></li> </ul>	<p>The consultants undertaking the IIA are familiar with the Guidance. The guidance will be referenced in the next iteration of the SA, along with other relevant guidance.</p>
<ul style="list-style-type: none"> <li>Alternative options (table 3.1) – it is noted that scoring has been applied for the Design and Heritage SA objective against the three options. However it is not clear how these conclusions were made? What criteria was used so that for example option 1 result in a ++ scoring? The commentary provides little evidence or understanding of the conclusions made.</li> </ul>	<p>Table 3.1 provides a strategic appraisal of 3 high level options that would provide the basis for spatial planning in the Borough. It is considered that the table, read in conjunction with the supporting text between paragraph 3.2.7 and 3.2.15 provides sufficient explanation. Account was also taken of proposed policies and it is assumed that development would take place in a manner that would conserve and enhance heritage assets. This assumption can be made explicit in the next iteration of the IIA.</p>
<ul style="list-style-type: none"> <li>Design and Historic Environment (paras 3.3.9-3.3.28) – the key issue is how the various options impact upon the significance of heritage assets as set out in the NPPF. It is not clear from the details whether this important consideration has been fully embedded in the thinking behind the conclusions made. This includes the two options being discussed in relation to tall buildings, where the scale and extent of tall buildings and their relationship with heritage assets is a major consideration, as well as the issue of graduation of buildings to respond to their surroundings. It is noted that in the last paragraph this raised issue is still being considered by the Council.</li> </ul>	<p>It is considered that so far as the assessment of general policies and broad options is concerned, e.g. in relation to the appraisal of the two different approaches to the location of tall buildings, the appraisal is robust. The Tower Hamlets Tall Buildings Study identifies a number of Tall Building Zones and other sites suitable for tall building development which help to inform Policy DH6 Tall Buildings. Heritage impacts have been taken into consideration in the following ways:</p> <ul style="list-style-type: none"> <li>Reviewing the borough's Conservation Strategy</li> <li>Assessing the borough's character, landmarks and views through undertaking site visits</li> <li>Considering the borough's existing policies on heritage and conservation.</li> </ul> <p>The Tall Buildings Study will be available from early July 2017.</p>

	The last sentence of this section relates to the need to review policies DH3 'The Historic Environment' and DH4 'World Heritage Sites' for consistency with the National Planning Policy Framework. This is highlighted in Appendix N of the IIA Report.
<ul style="list-style-type: none"> <li>Summary of Strategic Site Allocations (table 3.4) – it is with alarm that the heritage objective scores are low against all of the sites, with the best being rated at '0'. This suggests that the Site Allocation details have tested poorly against the principle of conserving and enhancing the historic environment, thus contrary to national policy. This should be addressed through a review of LP31 and the then re-tested in the IIA.</li> </ul>	The SA Framework has been designed to highlight potential effects associated with the development of sites and whether or not they are likely to be significant in the absence of mitigation, so for example, in terms of scoring a particular site, a potential negative effect is identified if a site is within a Conservation Area. This is done on a precautionary basis. The assessment is undertaken with no prior knowledge of the proposed design, unless a planning application has been received. The conclusion that all the sites test poorly against the NPPF is premature, as the site assessments have been undertaken on a precautionary basis (so without consideration of the application of proposed policies and subsequent mitigation).
<ul style="list-style-type: none"> <li>Conclusions (para 4.2.4) – it is noted that concerns are raised over the alignment of policies DH3 The Historic Environment and DH4 World Heritage Sites with the language and principles of the NPPF. We would suggest that the local plan should include policies that comply with national policy but also reflect local circumstances as supported by evidence. In this case the Borough's Conservation Strategy which provides useful understanding of the issues and responses to the challenges facing the historic environment in the Borough, as well as the Borough's Urban Structure and Characterisation study. It is not clear from the IIA whether these sources have been used.</li> </ul>	The Conservation Strategy is acknowledged in the SA Framework and Appendix E. The Urban Structure and Characterisation Study will be added to the baseline to inform the next iterations of the IIA.
<b>Environment Agency</b>	
<ul style="list-style-type: none"> <li>The Integrated Impact Assessment (IIA) notes that further justification is required for this (ES4) policy.</li> </ul>	The recommendation relates to the requirement for water conservation measures and the need to justify this by highlighting that the Borough is within an area of water stress.
<ul style="list-style-type: none"> <li>We disagree with the IIA (3.3.122 page 54) which concludes that this policy directs development away from flood risk areas. We consider that the policy does not include a strong steer directing inappropriate development away from areas of flood risk (application of the sequential test) or apply the sequential approach within a development boundary.</li> </ul>	LBTH to confirm if amending policy ES4 in light of the EAs comments. Having reviewed the policy against other recent examples it could make an explicit reference to the need for sequential testing and the exception test where relevant.
<ul style="list-style-type: none"> <li>The IIA incorrectly states that flood risks affecting the strategic sites are primarily associated with fluvial flooding from the River Thames (3.3.165). Please note that the section of the River Thames which your borough falls in is tidal not fluvial. It is important to ensure this is corrected as the risks associated between the types of flooding differ.</li> </ul>	Future iterations of the report to refer to tidal flood risk associated with the River Thames.
<ul style="list-style-type: none"> <li>The Integrated Impact Assessment has a typo on page 52 which refers to this policy as sustainable 'waste' management, rather than sustainable 'water' management.</li> </ul>	Noted – to be addressed in the next iteration of the IIA.
<b>St Williams Homes</b>	

<ul style="list-style-type: none"><li>We would also note that there is a contradiction between the Employment Land Review which identifies that the site is not suitable for employment use and the Integrated Impact Assessment which includes a 'Red' flag on economic growth because of notional loss of employment. Our view is that the latter is incorrect, and together they conflict with Paragraph 22 of the NPPF which advises against long-term protection of sites that are not suitable for employment.</li></ul>	<p>The site has been scored consistent with the SA Framework and identifies the potential for loss of employment capacity in the absence of mitigation. The purpose of this score is not to protect sites but ensure that any displacement of employment capacity is adequately mitigated. The IIA could cross reference the Employment Land Review in terms of the suitability of sites for employment.</p>
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## Appendix B

### SEA/SA Checklist



## Appendix B: SEA/SA Checklist

Quality Assurance Checklist for SEA/SA Elements of the IIA	
<b>Objectives and Context</b>	
<ul style="list-style-type: none"> <li>The plan's purpose and objectives are made clear.</li> </ul>	Section 1.2 of the main report.
<ul style="list-style-type: none"> <li>Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.</li> </ul>	Key sustainability issues have been identified through a review of relevant plans and programmes (see Section 2.2 and 2.4) and analysis of baseline conditions (see <b>Appendix D</b> ). These have informed the development of the SA Framework presented in <b>Appendix F</b> .
<ul style="list-style-type: none"> <li>SEA objectives are clearly set out and linked to indicators and targets where appropriate.</li> </ul>	Section 2.6 introduces the SA objectives and these are presented in <b>Appendix F</b> together with the factors that have been taken into consideration in the assessment of policies and sites against each objective.
<ul style="list-style-type: none"> <li>Links with other related plans, programmes and policies are identified and explained.</li> </ul>	A review of related plans and programmes is contained at <b>Appendix E</b> and summarised in Section 2.4 of this Report.
<b>Scoping</b>	
<ul style="list-style-type: none"> <li>The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.</li> </ul>	The environmental bodies were consulted on the Scoping Report between 14th December 2015 and 8th February 2016.
<ul style="list-style-type: none"> <li>The assessment focuses on significant issues.</li> </ul>	Sustainability issues have been identified in the baseline analysis contained in <b>Appendix C</b> . Section 2.2 summarises the key sustainability issues identified.
<ul style="list-style-type: none"> <li>Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</li> </ul>	Discussed in Section 2 of this report.
<ul style="list-style-type: none"> <li>Reasons are given for eliminating issues from further consideration.</li> </ul>	No issues have been knowingly eliminated from the assessment at this stage.
<b>Baseline Information</b>	
<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and their likely evolution without the plan are described.</li> </ul>	<b>Appendix D</b> of this SA Report presents the baseline analysis of the Borough's social, economic and environmental characteristics including their likely evolution without the Local Plan. Section 2.3 provides more general comments on the evolution of the baseline.
<ul style="list-style-type: none"> <li>Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.</li> </ul>	Throughout Section 3 of this Report, reference is made to areas which may be affected by the Local Plan.
<ul style="list-style-type: none"> <li>Difficulties such as deficiencies in information or methods are explained.</li> </ul>	Discussed in Section 2 of this report.
<b>Prediction and evaluation of likely significant effects</b>	
<ul style="list-style-type: none"> <li>Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.</li> </ul>	Sections 3.3 to 3.5 summarise the appraisal of the sustainability performance of the Local Plan. The Vision and Key objectives Policies, Development Principles for sub-areas and strategic sites are appraised. Detailed appraisal matrices are also provided at Appendix L (policies) and M (sub areas and strategic sites).
<ul style="list-style-type: none"> <li>Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.</li> </ul>	Positive and negative effects are considered within the appraisal matrices and within Sections 3.2 to 3.4. Potential effects are identified in the short, medium and long-term.

<b>Quality Assurance Checklist for SEA/SA Elements of the IIA</b>	
<ul style="list-style-type: none"> <li>Likely secondary, cumulative and synergistic effects are identified where practicable.</li> </ul>	The potential for cumulative and synergistic effects is considered in Section 3.5, Table 3.6 and in appendix L.
<ul style="list-style-type: none"> <li>Inter-relationships between effects are considered where practicable.</li> </ul>	Inter-relationships between effects are identified in the assessment commentary, where appropriate.
<ul style="list-style-type: none"> <li>Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.</li> </ul>	These are identified in the commentary, where appropriate.
<ul style="list-style-type: none"> <li>Methods used to evaluate the effects are described.</li> </ul>	These are described in Section 2.6 of the report.
<b>Mitigation measures</b>	
<ul style="list-style-type: none"> <li>Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.</li> </ul>	Recommendations are presented in Section 3.11.
<ul style="list-style-type: none"> <li>Issues to be taken into account in development consents are identified.</li> </ul>	Recommendations are presented in Section 3.11.
<b>The SA Report</b>	
<ul style="list-style-type: none"> <li>Is clear and concise in its layout and presentation.</li> </ul>	The SA Report is clear and concise.
<ul style="list-style-type: none"> <li>Uses simple, clear language and avoids or explains technical terms. Uses maps and other illustrations where appropriate.</li> </ul>	Maps and tables have been used to present the baseline information in Appendix D where appropriate.
<ul style="list-style-type: none"> <li>Explains the methodology used. Explains who was consulted and what methods of consultation were used.</li> </ul>	Section 2 presents the methodology used for assessment whilst consultation arrangements are discussed in Section 1.
<ul style="list-style-type: none"> <li>Identifies sources of information, including expert judgement and matters of opinion.</li> </ul>	Information is referenced throughout the SA Report.
<ul style="list-style-type: none"> <li>Contains a non-technical summary</li> </ul>	Included.
<b>Consultation</b>	
<ul style="list-style-type: none"> <li>The SEA is consulted on as an integral part of the plan-making process.</li> </ul>	This SA Report is being consulted upon at the same time as the Draft Local Plan consultation document.
<ul style="list-style-type: none"> <li>The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.</li> </ul>	This SA Report is being consulted upon at the same time as the Draft Local Plan consultation document.
<b>Decision-making and information on the decision</b>	
<ul style="list-style-type: none"> <li>The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.</li> </ul>	Responses received to this SA Report will inform the preparation of the Local Plan. Earlier responses to the IIA of the Regulation 18 Local Plan have informed this report.
<ul style="list-style-type: none"> <li>An explanation is given of how they have been taken into account.</li> </ul>	This information will be provided in subsequent SA Reports.
<ul style="list-style-type: none"> <li>Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.</li> </ul>	This information will be provided as the Local Plan is developed. Options considered during the development of the Local Plan to date are set out in Appendix J and assessed in Appendix K. The reasons for not taking strategic sites forward are set out in Table 3.4.

### **Quality Assurance Checklist for SEA/SA Elements of the IIA**

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|---|---|
| <ul style="list-style-type: none"><li>• Monitoring and Measures, measures proposed for monitoring are clear, practicable and linked to the indicators and objectives in the SA.</li></ul> | The Local Plan includes consideration of monitoring. Section 3.10 and Table 3.9 of this report provide an initial analysis in relation to proposed monitoring indicators and relation to the SA objectives. |
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## Appendix C

### Method for Developing the Sustainability Objectives (including key issues)



## Appendix C: Method for developing the Sustainability Objectives

<b>SEA/ Sustainability Dimension</b>	<b>Sustainability Appraisal Objectives of Core Strategy (Section 2.6)</b>	<b>Summary of policy, plans, and programmes (Section 2.7)</b>	<b>Sustainability issues (Section 3.4)</b>	<b>South Quay Masterplan SEA</b>	<b>Suggested Sustainability Objectives for Local Plan (section 4.3)</b>
<i>Population</i>	-	Plan for and meet the challenges of population growth.	Planning effectively in the context of high growth and population turn over.	-	Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services
<i>Equality and deprivation</i>	To reduce poverty and ensure equality of opportunity for all residents.  To ensure that the plan does not negatively affect existing residents of Tower Hamlets, and particularly disempowered groups.	Improve the quality of life for everyone and reduce deprivations.	High levels of multiple deprivations, particularly for income, housing, children and older persons.  Fuel poverty.  Income inequality	-	Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.
<i>Housing</i>	To give all residents quality, affordable housing.	Facilitate a wide choice of housing supply and affordability that caters for all.	Housing needs and targets.  Overcrowding  Affordability.  Achieving the right mix of tenures and bedrooms to meet needs.	To ensure that all residents have access to good quality, well-located, affordable housing that promotes liveability.	Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.

<b>SEA/ Sustainability Dimension</b>	<b>Sustainability Appraisal Objectives of Core Strategy (Section 2.6)</b>	<b>Summary of policy, plans, and programmes (Section 2.7)</b>	<b>Sustainability issues (Section 3.4)</b>	<b>South Quay Masterplan SEA</b>	<b>Suggested Sustainability Objectives for Local Plan (section 4.3)</b>
<i>Economy and employment</i>	To give all residents the opportunity of an occupation providing self-worth and a good livelihood, particularly in deprived areas.	Support a robust, low carbon and competitive economy that creates shared prosperity and helps all residents reach their full potential.	Differences between jobs available in TH and those of residents. Continue to support local access to employment and economic opportunities. Income deprivation.	To provide all residents with the opportunity of employment, particularly in deprived areas.	Employment: Reduce worklessness and increase employment opportunities for all residents.  Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.
<i>Education</i>	-	Increase opportunities for residents to get into training, access lifelong learning opportunities and acquire skills for employment to benefit from job opportunities.	Pressure on School Places: The expected housing and population growth in the borough increase the need for school places.  Lack of Early Years / Childcare places: In 2013 the Government introduced a new statutory duty on Councils to ensure adequate provision of 15 hours of childcare for disadvantaged two year olds. The borough's demographics mean that Tower Hamlets needs to	To protect existing, make provision for new, and maximise accessibility to education facilities to meet the needs of all sectors of the population.	Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.

<b>SEA/ Sustainability Dimension</b>	<b>Sustainability Appraisal Objectives of Core Strategy (Section 2.6)</b>	<b>Summary of policy, plans, and programmes (Section 2.7)</b>	<b>Sustainability issues (Section 3.4)</b>	<b>South Quay Masterplan SEA</b>	<b>Suggested Sustainability Objectives for Local Plan (section 4.3)</b>
			<p>provide the highest number of places.</p> <p>Major skills gap between local residents and the jobs available</p>		
<i>Safety</i>	To create safe and secure environments and reduce crime.	Improve the safety and security of all.	Rates of crime are higher than average. Residents perceive anti-social behaviour and crime as a problem.	-	Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services
<i>Health and wellbeing</i>	<p>To improve health, promote healthy lifestyles and reduce health inequalities.</p> <p>To maximise the accessibility to key services and amenities.</p>	Protect human health and reduce health inequalities.	<p>High levels of health inequality</p> <p>Life expectancy, mortality rates are worse than average, but improving.</p> <p>Environmental factors contribute to poor health ie. air, take-way shops.</p> <p>Poor child health</p> <p>Poor mental health</p>	To maximise the health and well-being of the population and reduce health inequalities.	Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.
<i>Air quality</i>	To improve air quality.	Improve air quality.	Air pollution levels exceed targets. Significant effects on human health.	To reduce pollution to air (and reduce disruption from noise and vibration through direct action and mitigation measures); to seek to improve the	Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.

<b>SEA/ Sustainability Dimension</b>	<b>Sustainability Appraisal Objectives of Core Strategy (Section 2.6)</b>	<b>Summary of policy, plans, and programmes (Section 2.7)</b>	<b>Sustainability issues (Section 3.4)</b>	<b>South Quay Masterplan SEA</b>	<b>Suggested Sustainability Objectives for Local Plan (section 4.3)</b>
			Transport is a huge contributor to air pollution.	quality of the air as far as possible.	
<i>Climate change and energy</i>	To combat fuel poverty, reduce energy consumption, and promote renewable forms to reduce greenhouse gas emissions.	Promote energy security and increase proportion of energy use from renewable sources.  Minimise the contribution to climate change and promote mitigation and adaptation measures to address negative effects of climate change.	Logistics and governance of delivering decentralised energy supplies.  Effects on air quality. Meeting energy targets. Mitigating the Urban Heat Island Effect	To ensure that the Masterplan adapts to the effects of climate change (both now and in the future) and contributes to climate change mitigation, achieves greater energy efficiency and reduces its reliance on fossil fuels.	Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.
<i>Transport</i>	To reduce the need to travel, reduce private vehicular transport and encourage the use of public transport, cycling and walking.	Promote accessible, safe and sustainable transport and reduce transport related contributions to climate change.	Meeting increased travel demand associated with population growth and development.  Providing for and influencing behaviour change towards utilising more sustainable travel choices.  High CO2 levels from transport.	To increase the proportion of journeys made by walking and cycling followed by bus or train (relative to those taken by car).	Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.
<i>Biodiversity</i>	To conserve, enhance and where appropriate create species, habitats,	Maintain biodiversity; conserve natural	Increased development poses problems and	To protect, conserve and enhance the biodiversity (within the Masterplan	Biodiversity: Protect and enhance biodiversity, natural habitats, water

<b>SEA/ Sustainability Dimension</b>	<b>Sustainability Appraisal Objectives of Core Strategy (Section 2.6)</b>	<b>Summary of policy, plans, and programmes (Section 2.7)</b>	<b>Sustainability issues (Section 3.4)</b>	<b>South Quay Masterplan SEA</b>	<b>Suggested Sustainability Objectives for Local Plan (section 4.3)</b>
	green spaces and watercourses.	habitats, water bodies and landscapes of importance.	opportunities for biodiversity. Areas with deficient access	Area and wider borough) and where appropriate create habitats, green and open spaces and water courses.	bodies and landscapes of importance.
<i>Soil</i>	-	Safeguard and enhance the quality of soil.	Soil sealing impact on flooding.  Remediation of land from industrial uses and other polluting uses where there are changes in land use.	To reduce pollution to land through direct action or mitigation; to seek to improve the quality of the land as far as possible.	Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.  Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.
<i>Flood risk reduction and management</i>	To minimise flood risk within the borough and elsewhere, and promote the use of sustainable urban drainage systems.	Reduce and manage the risk of floods.	Significant proportion of the borough at risk of flood.  Measures in place to reduce risk.  On-going risk reduction requires co-operation among boroughs and authorities.	To minimise flood risk to people and property within the Masterplan Area and wider borough and elsewhere, and promote the use of sustainable urban drainage systems.	Flood risk reduction and management: To minimise and manage the risk of flooding

<b>SEA/ Sustainability Dimension</b>	<b>Sustainability Appraisal Objectives of Core Strategy (Section 2.6)</b>	<b>Summary of policy, plans, and programmes (Section 2.7)</b>	<b>Sustainability issues (Section 3.4)</b>	<b>South Quay Masterplan SEA</b>	<b>Suggested Sustainability Objectives for Local Plan (section 4.3)</b>
<i>Water resources and use</i>	To improve the quality of water and to achieve the wise management of sustainable use of water resources.	Encourage reduced and more efficient use of water.	Quality of water bodies is moderate, while their ecology is poor.	To improve water quality and reduce water use.	Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.  Flood risk reduction and management: To minimise and manage the risk of flooding
<i>Waste</i>	To minimise waste requiring disposal and to increase recycling and recovery.	Reduce waste, enhance recycling and reuse, and promote sustainable waste management.	No additional sites available in borough for land fill. Low recycling rates, especially of wet waste	To minimise the production of waste across all sectors and increase reuse, recycling, remanufacturing and recovery rates.	Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.
<i>Noise</i>	To reduce the impact of noise.	Avoid, prevent and reduce adverse effects due to the exposure to environmental noise.	With increased development, need to reduce noise impacts of adjacent land uses. Aircraft noise from flight paths of London City Airport.	To reduce disruption from noise and vibration through direct action and mitigation measures.	Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services
<i>Town centres</i>	-	Support the vitality of diverse, inclusive and secure town centres and neighbourhoods.	Uses that support the vitality and wellbeing of communities (ie healthy high streets).	To enhance local townscape/landscape character and improve the quality of the built	Town Centres: Promote diverse and economically thriving town centres.

<b>SEA/ Sustainability Dimension</b>	<b>Sustainability Appraisal Objectives of Core Strategy (Section 2.6)</b>	<b>Summary of policy, plans, and programmes (Section 2.7)</b>	<b>Sustainability issues (Section 3.4)</b>	<b>South Quay Masterplan SEA</b>	<b>Suggested Sustainability Objectives for Local Plan (section 4.3)</b>
			Ensuring profits benefit the community by enabling local businesses and employment opportunities.	environment and public open spaces.	
<i>Heritage and archaeology</i>	To promote good quality in urban design, and the conservation and appreciation of the historic environment.	Protect, conserve and enhance the historic environment.	Pressure from development. Building use. Trans-boundary matters. The opportunity areas in the borough are located in areas of high archaeological importance	To enhance and protect the significance of heritage assets and archaeological heritage.	Design and Heritage: Enhance and protect heritage and cultural assets; distinctive character and an attractive built environment..
<i>Open space</i>	-	Increase open spaces that are high quality, networked and multi-functional	Borough has various quality open spaces. Challenges arise from competing needs for space in the borough and the impact of increased population on open and recreational spaces. A key challenge is to provide sufficient open space for an increasing population given existing restriction of space.	To provide accessible social and community facilities and open spaces.	Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.

<b>SEA/ Sustainability Dimension</b>	<b>Sustainability Appraisal Objectives of Core Strategy (Section 2.6)</b>	<b>Summary of policy, plans, and programmes (Section 2.7)</b>	<b>Sustainability issues (Section 3.4)</b>	<b>South Quay Masterplan SEA</b>	<b>Suggested Sustainability Objectives for Local Plan (section 4.3)</b>
Trans-boundary cooperation	-	Foster trans-boundary cooperation and co-delivery of strategies and services to address issues where appropriate.	<p>Governance and coordination of trans-boundary matters is significant in addressing (but not limited to):</p> <ul style="list-style-type: none"> <li>• Housing</li> <li>• Waste</li> <li>• Heritage</li> <li>• Water</li> <li>• Flood risk</li> <li>• Transport</li> <li>• Energy</li> </ul> <p>Conversely, Local Plan may affect areas outside of the borough. Duty to cooperate</p>	-	An important issue but not so relevant for a sustainability objective. Should be taken account of in Local Plan.
Skyline and Views and amenity	To promote good quality in urban design, and the conservation and appreciation of the historic environment.  To promote good quality in urban design, and the conservation and appreciation of the historic environment.	The London Plan designates 27 views across London. Tower Hamlets regularly responds to planning applications which could impact on four of these views: <ul style="list-style-type: none"> <li>• View 5: Greenwich Park to Central London</li> <li>• View 10: Tower Bridge</li> </ul>	The borough may wish to undertake local view assessments to understand whether there are local views which should be protected.	<p>To achieve a planned and aesthetically balanced skyline, as seen in protected views.</p> <p>To protect views and the visual amenity of people living and working in and visiting the area and surroundings.</p>	Design and Heritage: Enhance and protect heritage and cultural assets; distinctive character and an attractive built environment.

<b>SEA/ Sustainability Dimension</b>	<b>Sustainability Appraisal Objectives of Core Strategy (Section 2.6)</b>	<b>Summary of policy, plans, and programmes (Section 2.7)</b>	<b>Sustainability issues (Section 3.4)</b>	<b>South Quay Masterplan SEA</b>	<b>Suggested Sustainability Objectives for Local Plan (section 4.3)</b>
		<ul style="list-style-type: none"> <li>View 24: Island gardens, Isle of Dogs to Royal Naval College</li> <li>View 25: The Queen's Walk to Tower of London</li> </ul>			
Daylight, Sunlight and Wind			Increasing development is raising issues around sunlight, daylight and wind effects.		Design and Heritage: Enhance and protect heritage and cultural assets; distinctive character and an attractive built environment.





## Appendix D Baseline



## **Appendix D: Baseline**

### **Introduction**

The baseline information consists of indicators that have been incorporated into the Sustainability Appraisal Framework. Other information that is contextually important but not included in the framework is noted as ‘contextual characteristics’.

## **1. Population**

### **1.1 Indicators**

There are no population indicators included in the Sustainability Framework.

### **1.2 Contextual characteristics**

The following were used to characterise current and future population.

- 1.3.1 Current and future population and growth rates (LBTH Borough Profile website based on 2011 Census and 2015 update on estimate; 2012-based Subnational Population Projections for England. ONS, 2014).
- 1.3.2 Population density (ONS 2012 MYE).
- 1.3.3 Age structure and sex (LBTH Borough Profile website).
- 1.3.4 Ethnicity and country of birth (LBTH Borough Profile website).

### **1.3 Description**

#### **1.3.1 Current and future population and growth rates**

There were an estimated 284,000 people in Tower Hamlets in mid-2014. This represented an increase in population of 4.1 per cent or an additional 11,000 people from the previous year. This trend is also reflected in longer-term population growth. Over the 10 year period to 2011, the population increased by 34.5 per cent. This was the highest proportional increase of all local authorities across England and Wales.

According to the GLA’s 2014 SHLAA population projections, the borough’s population is projected to increase from 280,474 in 2014 to 364,804 in 2024, an increase of 23%. This large population growth will not be uniform across different elements of the population and will lead to changes in the demographics of our borough.

#### **1.3.2 Population density**

The population density in 2012 was estimated to be 13,235 residents per km<sup>2</sup>. This made the borough the second densest borough in London after Islington. The population of Tower Hamlets is highly mobile with a high ‘turnover’ rate of 229 people per 1000 people moving to, from and within the borough each year.

#### **1.3.3 Age structure and sex:**

Tower Hamlets has a relatively young age structure. In particular there is a high proportion of young adults being those aged between 20-39 years old. This age group constitutes almost half of the boroughs population (48 per cent compared to 35 per cent for the London region). As such, Tower Hamlets has proportionately fewer older residents of those aged over 60 years old (9 per cent compared with 15 per cent for London overall).

The growth projections show that the borough's population will increase across all of the age groups, but that the greatest increases will be amongst the older working age population (ages 35 to 64).

Tower Hamlets has proportionately more males than females (51.7 per cent males and 46.4 per cent females). This is in contrast to broader trends in London and England which have slightly more females than males.

#### **1.3.4 Ethnicity and country of birth:**

43 per cent of residents in Tower Hamlets were born outside of the United Kingdom, as of 2011. This is comparative to the London average of 42 per cent. Tower Hamlets has a diverse migrant population including those who migrated decades ago to more recent arrivals. According to the 2011 Census, residents of Tower Hamlets were born in over 200 countries. Bangladeshis comprised the largest migrant group representing 15 per cent of the borough population. A further 20 migrant groups had significant populations of over 1,000 residents. The largest of which were from: India, China, Italy, France, Somalia, Ireland, Poland, Australia, Germany, the U.S.A., and Spain. Each of these groups comprised 1-2 per cent of the population. In recent years, the most significant population growth has been from European migrants.

The growth projections state that the increasing population will also create changes in the ethnicity of residents. The largest percentage increase will be in the 'other' category, which will increase by 49% from 10,600 in 2014 to 15,769 in 2024, reflecting the increasing 'hyper diversity' of the borough. The 'White' population is also due to increase by 33% over the next ten years, whilst the 'Bangladeshi' population is due to increase by a relatively smaller 16%.

#### **1.4 Issues**

The main population issues in the borough are:

- LBTH was the second fastest growing borough in England and Wales for the year 2013/14 (based on proportion). High growth is predicted to continue.
- This has implications for planning, housing, and services amongst other matters.

#### **1.5 Data gaps and updates**

- No significant data gaps identified for this topic.
- Population trends and figures should be updated throughout the plan making process to reflect ONS's latest estimates.

## **2. Equality**

### **2.1 Indicators**

The following indicators were used to characterise equality in the borough and included in the Sustainability Appraisal Framework.

- 2.3.1 Indices of deprivation (*English Indices of Deprivation, 2010; and summarised in LBTH Indices of Deprivation Summary, 2011*).
- 2.3.2 Percentage of children living in deprived households (*English Indices of Deprivation, 2010; and summarised in LBTH Indices of Deprivation Summary, 2011*)
- 2.3.3 Percentage of older persons living in deprived households (*English Indices of Deprivation, 2010; and summarised in LBTH Indices of Deprivation Summary, 2011*).
- 2.3.4 80:20 pay ratio (*London's Poverty Profile, 2014*)

### **2.2 Contextual characteristics**

There are no further contextual characteristics in this section.

### **2.3 Description**

#### **2.3.1 Index of Multiple Deprivation 2010: Local authority rankings**

The Index of Multiple Deprivation (IMD) is a composite index which has been built from 38 different indicators. These indicators are designed to capture different dimensions of the scale, severity and nature of multiple deprivations within an area.

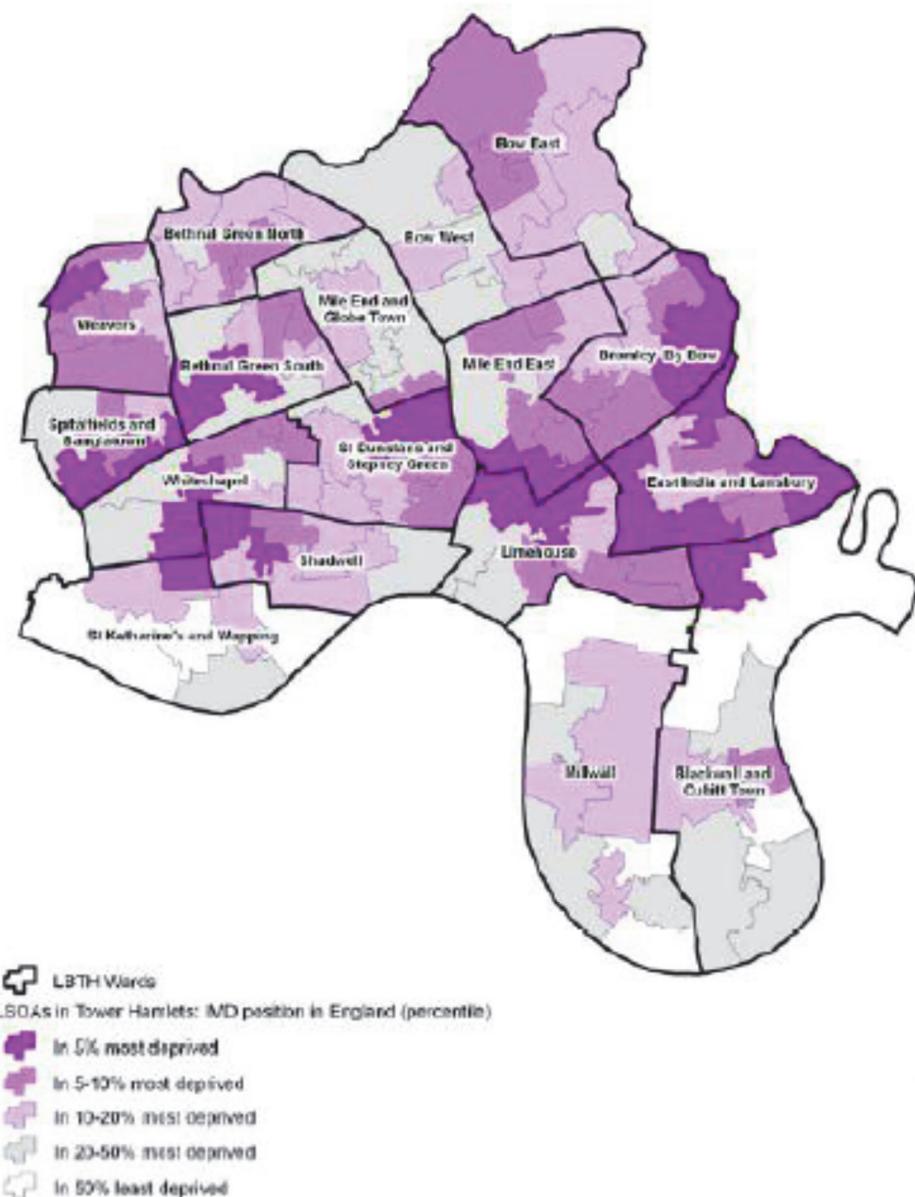
The indices that comprise the IMD are:

- Income deprivation;
- Employment deprivation;
- Health deprivation and disability;
- Education, skills and training deprivation;
- Barriers to housing and services;
- Living environment; and
- Crime.

There are two additional indices of deprivation which are not part of the IMD. These are:

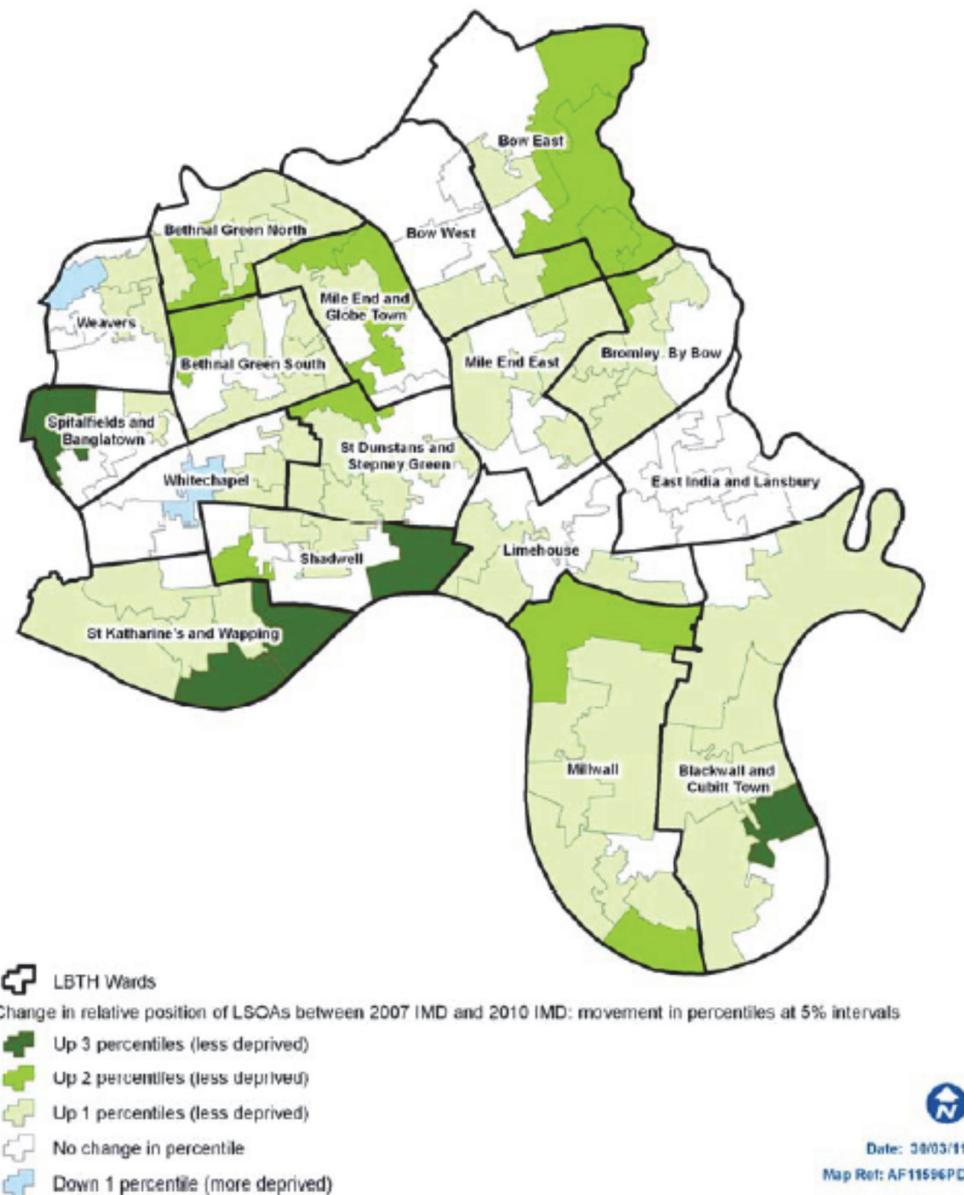
- The Income Deprivation Affecting Children Index (IDACI); and
- The Income Deprivation Affecting Older People Index (IDAOP).

Tower Hamlets is ranked the third most relatively deprived area in London, following Hackney and Newham for IMD average score, rank and extent (LBTH, 2011). Figure 1 shows that there are notable geographic differences in relative levels of multiple-deprivation across the borough. There are notable concentrations of relative deprivation around parts of Spitalfields and Banglatown; Whitechapel; East India and Lansbury; Bromley By Bow; and southern Mile End East/north Limehouse. The relatively least deprived areas are located near St Katharine's and Wapping; Millwall; and Blackwall and Cubitt Town.



**Figure 1 graphic distribution of the Index of Multiple Deprivation 2010. Source: Indices of Deprivation 2010, DCLG in LBTH, 2011.**

The borough is the most deprived area in London in terms of concentration of deprivation in small areas within the borough. 40 per cent of these smaller areas (called Lower Super Output Areas (LSOAs)), are in the top 10 per cent of the most deprived areas in England. This is an improvement from 2007 when 55 per cent of LSOAs were recorded for the same measure. Changes in IMD between 2007 and 2010 for LSOAs are shown in Figure 2.



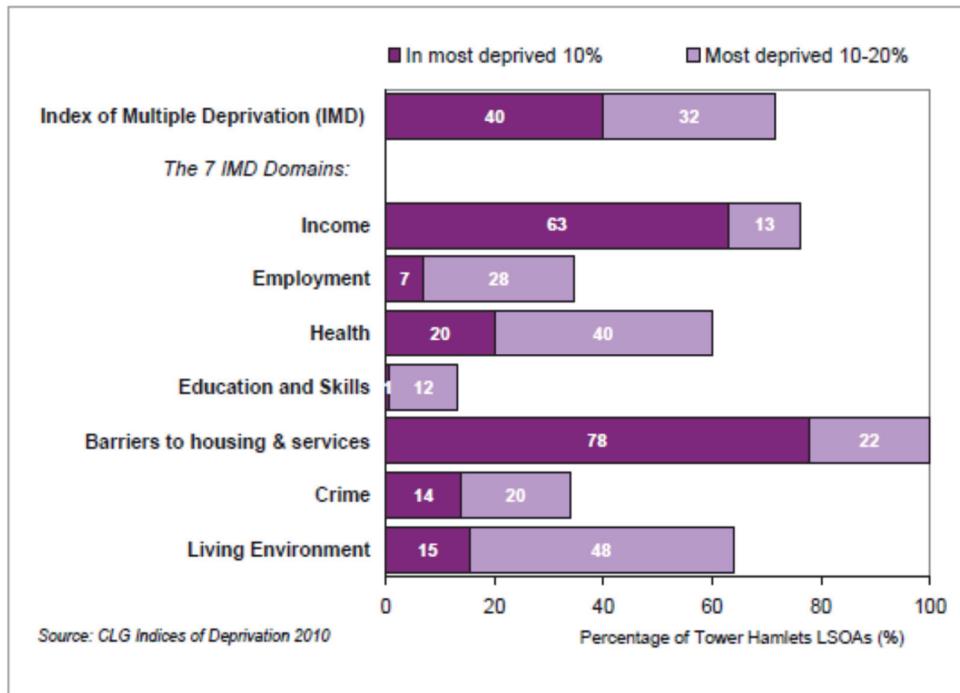
**Figure 2: Change in IMD between 2007 and 2010. Source: Indices of Deprivation 2010, DCLG in LBTH, 2011.**

Figure 3 shows the proportion of LSOAs in the most deprived 10 per cent and 20 per cent of all LSOAs in England. Of note, the indices with the highest proportion of LSOAs were barriers to housing and services; and income. 100 per cent of LSOAs were in the most 10-20 per cent of

deprived areas in England in terms of barriers to housing and services. 78 per cent of these were in the 10 per cent most deprived LSOAs in England for this measure.

In terms of income, 76 per cent of the borough's LSOAs were in the worst 10-20 per cent of deprived LSOAs in England. 63 per cent of the borough's LSOAs were in the 10 per cent most deprived areas for income in England.

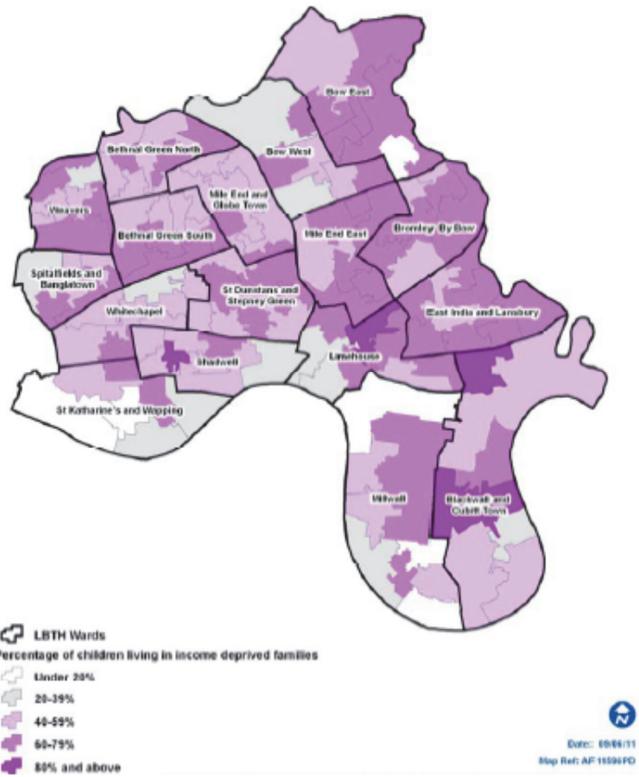
Relative to all other LSOAs in England, the borough's LSOAs are relatively least deprived in terms of education and skills; crime and employment. For education and skills only one LSOA is in the 10 per cent most deprived LSOAs in England, while another 12 were ranked within the top 10-20 per cent most deprived.



**Figure 3: : Percentage of Tower Hamlets LSOAs among the most deprived in England for the IMD 2010 and the 7 domains. Source: CLG Indices of Deprivation in LBTH, 2011.**

### 2.3.2 Children living in deprivation

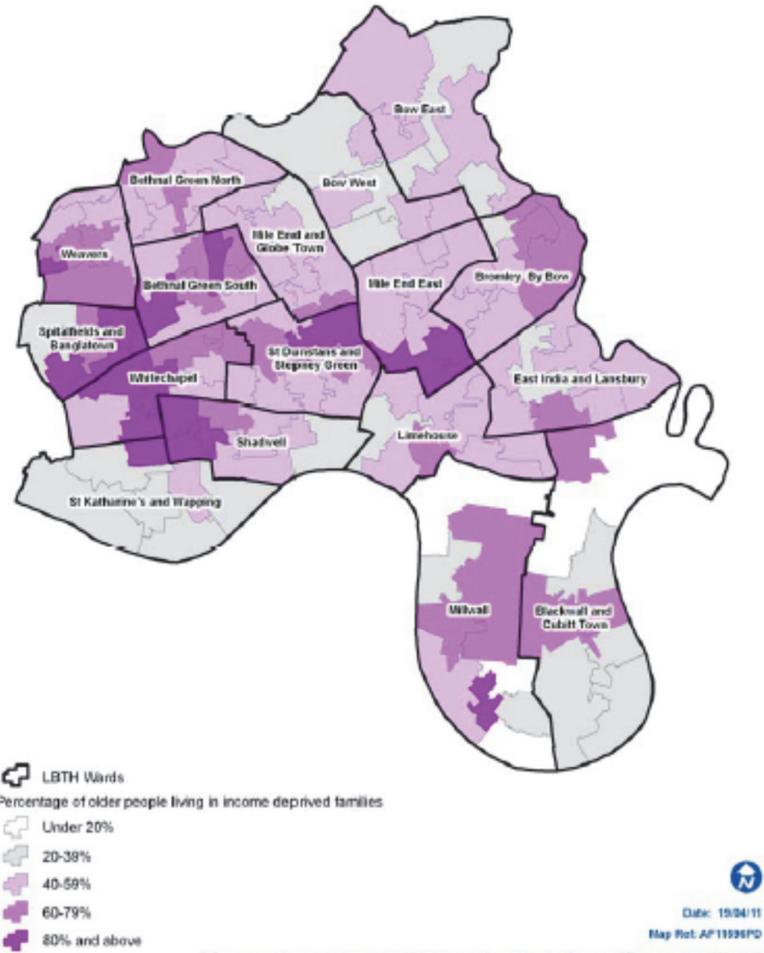
Tower Hamlets had a relatively higher proportion of children aged 0-5 years old living in income deprived families (59 per cent in the borough, compared to 32 per cent across London). This was the highest rate for child deprivation across England. A significant 84 per cent of LSOAs in the borough fall into the most deprived 10 per cent of all LSOAs nationally. Figure 4 shows the geographic distribution of child deprivation across the borough.



**Figure 4: Percentage of children living in income deprived families, Source: Indices of Deprivation of Communities and Local Government, in LBTH, 2011.**

### 2.3.3 Older persons living in deprivation

More than half of older persons (52.5 per cent) lived in income deprived families. This was more than double the London average of 23.8 per cent. 79 per cent of LSOAs in the borough fell into the most deprived 10 per cent of LSOAs nationally. Figure 5 shows the geographic distribution of older persons living in income deprived families. There are notable concentrations of more than 80 per cent of older persons living in income deprived households in areas near Spitalfields and Banglatown; Whitechapel; St Christopher's and Stepney Green; Mile End East and Millwall.



**Figure 5: Percentage of older persons living in income deprived families. Source: Indices of Deprivation of Communities and Local Government, in LBTH, 2011.**

#### 2.3.4 80:20 pay ratio

Tower Hamlets has the highest pay ration between the 80<sup>th</sup> and 20<sup>th</sup> income percentiles of all London Boroughs. In 2014 it was 3.2, up from 2.9 in 2009.

#### 2.4 Issues

- The borough is one of the most relatively deprived areas in London and England for multiple deprivations.
- The levels of income and housing deprivations are particularly high.
- The proportion of children and older persons living in income deprived families is significantly high.
- There has been an improvement in relative deprivation since 2007.
- Pay inequality is high and increasing

#### 2.5 Data gaps and updates

- The data presented here should be reviewed when an update is released. Any associated trends should be utilised to inform the Sustainability Appraisal and Local Plan evidence base.

## **3. Housing**

### **3.1 Baseline indicators**

The following indicators were used to characterise housing in the borough and included in the Sustainability Appraisal Framework.

- 3.3.4 Additional housing need (GLA London Strategic Housing Market Assessment 2013; LBTH Strategic Housing Market Assessment, 2014 (draft)).
- 3.3.5 Affordable housing need (GLA London Strategic Housing Market Assessment 2013; LBTH Strategic Housing Market Assessment, 2014 (draft)).
- 3.3.7 Demand for three or more bedroom dwellings (LBTH, Strategic Housing Market Assessment, 2014 (draft)).
- New housing that is carbon neutral (data not available).

### **3.2 Contextual characteristics**

#### **Households**

- 3.3.1 Number of current and projected households (CRU, 2012 and LBTH Strategic Housing Market Assessment, 2014 (draft))
- 3.3.1 Average and variation in household size and composition (ONS Local Profiles 2013; LBTH Borough Profile)

#### **Dwellings**

- 3.3.2 Dwelling stock total (ONS Local Profiles 2013)
- 3.3.3 Number of vacant residential units (ONS Local Profiles 2013)

#### **Housing Needs**

- 3.3.4 Housing needs, targets and trajectories (GLA London Strategic Housing Market Assessment 2013; LBTH Strategic Housing Market Assessment, 2014 (draft))
- 3.3.5 Number and proportion of households needing affordable housing per annum (LBTH Housing Market Assessment, LBTH Strategic Plan 2015/16)

#### **Ownership and tenure**

- 3.3.6 Ownership and tenure (LBTH Borough Profile)

#### **Bedrooms and overcrowding**

- 3.3.7 Number of dwellings by bedrooms per dwelling (LBTH, Strategic Housing Market Assessment, 2014 (draft))
- 3.3.7 Overcrowding (LBTH Overcrowding and under occupation statement, 2013)

#### **House prices and affordability**

- 3.3.8 Average house price (LBTH-CRU Factsheet 2013-02 June 2013)
- 3.3.8 Ratio of relative housing affordability (ONS Local Profiles 2013)

#### **Specialist housing**

- 3.3.9 Older persons housing (LBTH Older Person Housing Statement 2013-2015)
- 3.3.10 Number of travellers' pitches (LBTH Managing Traveller Accommodation)
- 3.3.11 Demand for student accommodation (LBTH Student Accommodation Report 2009)
- 3.3.12 Number of homeless households (LBTH Homelessness Statement 2013-2017)

### **3.3 Description**

#### **3.3.1 Households, number, size, composition and projections**

In 2011 there were 101,257 households (with at least one usual resident<sup>1</sup>). In the 10 years between 2001 and 2011, the number of households in Tower Hamlets grew by an additional 22,727 households or 28.9 per cent. This was the highest growth rate in London and represented 9.1 per cent of all additional households in London. The average household in Tower Hamlets had 2.5 people in 2011. Household size varied with an average of 2.07 persons in the ward of St Katherine's and Wapping; while Mile End East had the largest household size with 2.85 persons. Between 2011-2035 the number of households in Tower Hamlets is projected to rise by 53,086 equating to 2,212 additional households per year. Table 1 shows the estimated increases in the number of households at 2 year intervals between 2011 and 2021.

Year	2011	2013	2015	2017	2019	2021
No of households predicted	102,100	109,500	116,500	123,000	129,100	134,800

**Table 1 Household projections (interim 2011 based). Source: Department for Communities and Local Government in ONS, 2013.**

### 3.3.2 Dwelling stock total

There were a total of 108,250 dwellings in the borough in 2012 (ONS, 2013). The majority of dwellings (85.9 per cent) were flats, maisonettes and apartments. The proportion of these dwellings increased by 2.3 per cent between 2001 and 2011; and is predicted to increase as the dominant type of dwelling stock in the borough.

### 3.3.3 Number of vacant residential units

There were 2,317 vacant dwellings in the borough in 2012. This equated to 2.14 per cent of all dwellings. Over a third of these (34.8 per cent) have been vacant for a long period of time. This is slightly higher than the rate (33 per cent) for long-term empty dwellings across London.

### 3.3.4 Housing needs, trajectories and targets

As stated above, it is predicted that Tower Hamlets will have 134,800 households by 2021. The Further Alterations to the London Plan (update March 2015) sets targets for additional housing for each borough. It has allocated a target of 3,931 new units per annum in Tower Hamlets. This equates to 94,300 additional dwellings over 25 years until 2035. Tower Hamlets has prepared a draft Strategic Housing Market Assessment (SHMA) 2014 to understand the local particulars of housing need in the borough. The purpose of this assessment is to contribute to the housing evidence base for the Local Plan 2016/17. Based upon objectively assessed need, it estimates that the borough requires 2,562 dwellings per annum or 58,300 over 24 years. There is therefore a discrepancy between the target set by the GLA and the assessed need calculated by LBTH of almost 2,000 dwellings per year.

### 3.3.5 Number and proportion of households needing affordable housing per annum [info based on LBTH SHMA, 2014 draft not published]

Currently, 38-39 per cent of housing stock in the borough is affordable. This includes all intermediate, social and affordable housing. In 2012, the Tower Hamlets Council's had a total dwelling stock of 12,517. In 2015, there was a waitlist of 19,810 households on Council's housing wait list. On average about 2,200 properties become available through the housing wait list per year.

	2007/08	2008/09	2009/10	2010/11	2011/12
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<sup>1</sup> NB: A usual resident refers to a person who on census day, was in the UK and had stayed or intended to stay in the UK for a period of 12 months or more, or had a permanent UK address and was outside the UK and intended to be outside the UK for less than 12 months.

No of affordable dwelling provided	1,380	1,250	1,990	1,260	1,800
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**Table 2 Number of affordable dwellings provided by local authority provided funding.** Source: Department for Communities and Local Government from Homes and Community Agencies and local authorities in ONS Local Profiles, 2013

The Further Alterations to the London Plan has set a target of 52 per cent affordable housing for all additional housing until 2034/35. This figure includes: 20 per cent intermediate and social rent; and 32 per cent affordable rent.

Housing Type	Number	Per cent
Market Housing	19,400	32.8
Intermediate Housing	2,500	4.4
Social rented housing (including affordable rented housing)	36,300	62.8
<b>TOTAL</b>	<b>58,300</b>	<b>100</b>

**Table 3 from SHMA, 2014 draft**

### 3.3.6 Ownership and tenure

Table 4 shows that the most significant changes in tenure have been the reduction of council owned dwellings (a decrease of 16 per cent), and the rise in the private rental sector (PRS) (an increase of 19 per cent). The table also shows that shared ownership represents a small proportion of all tenure and that there has been a decline in owner occupation of 8 per cent over the past 11 years. To sum, there are proportionately more people living in private sector rentals, less people living in council housing and less owner occupiers.

Tenure	2003	%	2011	%	2014	%
Owner Occupied	27,308	31	25,339	23	27,179	23
Council Owned	24,200	26	12,500	12	12,087	10
Registered Provider	17,828	20	26,484	24	30,540	26
PRS	17,513	20	41,870	39	45,978	39
Shared Ownership	500	1	2000	2	2,340	2
Total	87,349		108,193		118,125	

**Table 4 Tenure Change 2003-2014.** Source: LBTH **SMHA 2014**.

### 3.3.7 Bedrooms and overcrowding

The borough has a reported average of 3.9 bedrooms per household. This is a decline of from 4 bedrooms in 2001. In the 2011 Census, Tower Hamlets had an average of 2.1 bedrooms per household, for an average household size noted above of 2.5 with an average range of 2.07 to 2.85. The borough shared the lowest averages across the nation with 3 other Inner-London boroughs (LBTH, Overcrowding Statement, 2013). In terms of overcrowding, 32,235 households had too few rooms than what they required. This represented 34.8 per cent of all households in the borough and was an increase on the 2001 figure which found that 29 per cent of households did not have enough rooms (22,984 households). As such the borough is ranked second nationally, after Newham 34.5) for proportion of households that are over occupied. The Inner London average was 21.7 per cent and in London it was 21.7 per cent.

While households are reportedly getting smaller, the borough still needs more 3 and 4 bedrooms. This is particularly so in the socially rented sector. Of households on the social housing waitlist in

2012 (ONS, 2013), 68.9 per cent required up to and including 2 bedrooms, 23.1 per cent required 3 bedrooms and 8.0 per cent required more than 3 bedrooms. The need for 3 and 4 bedrooms is higher than the London average.

	<b>Market</b>	<b>Intermediate</b>	<b>Social</b>	<b>TOTAL</b>
1 Bedroom	1,800	1,400	11,500	14,700
2 Bedroom	5,400	300	9,900	15,600
3 Bedrooms	8,500	400	11,400	20,300
4 Bedrooms	3,700	500	3,400	7,600
<b>TOTAL</b>	<b>19,400</b>	<b>2,500</b>	<b>36,300</b>	<b>58,300</b>

Table 5 LBTH assessed for bedrooms per dwelling and per tenure type in LBTH. Source: LBTH SHMA, 2014.

	<b>Market</b>	<b>Intermediate</b>	<b>Social</b>	<b>TOTAL</b>
1 Bedroom	4,400	2,100	18,600	24,900
2 Bedroom	9,600	1,800	15,600	26,900
3 Bedrooms	14,200	1,200	16,100	31,400
4 Bedrooms	6,000	600	3,800	10,400
<b>TOTAL</b>	<b>34,100</b>	<b>5,600</b>	<b>54,600</b>	<b>94,300</b>

Table 6 GLA targets for bedrooms per dwelling and per tenure type in LBTH. Source: LBTH, SHMA, 2014.

### 3.3.8 Housing costs and ratio of relative housing affordability

The average housing price in Tower Hamlets in April 2013 was £370,500. This was slightly below the London average of £375,800. House prices saw a 4.2% rise over the previous 12 months. Between 2010 and 2015 House Prices rose 46%.

House prices have increased relative to incomes in the borough. This is particularly so for housing and incomes in the lowest 25%. The ratio for which has risen from 6.4 in 2003 to 9.32 in 2014<sup>2</sup>. This is still amongst the most affordable in London, however the earnings data excludes self employed and unemployed residents – which may skew the result.

Key drivers that are expected to affect affordability and the housing market include: introduction of affordable rent, rent hikes in the private rental sector, buy to let scheme and overseas development<sup>3</sup>.

### 3.3.9 Specialist housing- older person's housing

The majority of older persons in Tower Hamlets tend to live in flats and in rented social housing. This is in contrast to wider London and national trends. In addition, Bangladeshi older persons often live in extended multigenerational households. LBTH has smallest proportion of older persons in the greater London region. There is a need to do more work on older person housing in the borough.

### 3.3.10 Specialist housing- traveller's accommodation

As of 2011 there was one traveller's site located in the borough at Eleanor Street. This site has capacity to accommodate 19 pitches. There is scope for a further 1 to 2 pitches if the site is redesigned by Crossrail. As of August 2015, there were no recorded traveller families in housing in LBTH. The LBTH Gypsies and Traveller Criteria 2009, provides criteria for developing new sites.

<sup>2</sup> <http://data.london.gov.uk/dataset/ratio-house-prices-earnings-borough>

<sup>3</sup> LBTH SMHA, 2014

Previous targets set for traveller accommodation in local areas have been removed and current provision is deemed to meet current demand.

### **3.3.11 Specialist housing- student accommodation**

Students made up 1.9 per cent of all Tower Hamlets households in 2011 equating to 1,974 households. With three universities located in the borough and a number of others located nearby, there is a steady demand for student accommodation. However, the supply of student accommodation needs to be kept in perspective with council's other priorities and demands for land and development. For example, due to the strong demand and delivery of student housing, in the years leading up to 2007, up to a third of the borough's annual housing provision was met through student housing. Student housing delivery does not however contribute to increasing the number of affordable houses, or address the borough's other significant housing needs.

### **3.3.12 Specialist housing- homeless households**

Tower Hamlets Council's homelessness services had 3,300 approaches by households in 2011/12 presenting as homeless or at risk of being homeless. 38 per cent of these households were families and 62 per cent were lone persons.

Reasons that persons and households gave for homelessness were:

- Parents no longer willing to accommodate (24 per cent)
- Other relatives and friends no longer willing to accommodate (22 per cent)
- Domestic violence (14 per cent)
- Termination of Assured Short hold Tenancy (11 per cent)

The number of decisions on homelessness has declined significantly since 2008/09, with a 30 per cent reduction in the 3 years between 2008/09 to 2011/12. This was partially due to prevention efforts such as housing advice and support. Numbers have been more stagnant post 2012.

## **3.4 Issues**

- Housing is a key local challenge for Tower Hamlets. This is particularly true given the fast growing population, low income levels for many households and high house prices.
- Overcrowding is an issue, particularly in social housing. There is a need for more 3-4 bedroom dwelling stock.
- The borough is currently not building enough homes to meet locally assessed nor regionally assessed need.
- Housing has been getting less affordable in the borough. There are issues of who can afford to live in the borough, as well as setting and achieving the 'right' proportional mixture of housing tenures to meet the needs of all residents.
- The housing targets set by the GLA as well as other housing matters such as provision for travellers require cooperation with other local government authorities within London and also further afield. The processes and relations necessary to further operationalise the duty to cooperate on housing matters may need to be further developed.

## **3.5 Data gaps and updates**

- There is a potential need to better understand the need and nature of older person housing in the borough as the characteristics of older person housing needs differ from the norm across the GLA.
- Data on the proportion of new dwellings that are carbon neutral is not available.

## **4. Economy and Employment**

### **4.1 Indicators**

The following indicators were used to characterise economic and employment conditions in the borough and inform the Sustainability Appraisal Framework.

- 4.2.1 Major industries of employment (BRES, 2012 in LBTH, 2014)
- 4.2.2 Number of jobs in the borough (BRES, 2012 in LBTH, 2014)

Employment and unemployment characteristics of residents

- Number and proportion of residents employed (NOMIS-Official Labour Market Statistics Local Authority Profile- Tower Hamlets, 2014)
- Number and proportion of residents unemployed (NOMIS-Official Labour Market Statistics Local Authority Profile- Tower Hamlets, 2014)
- Occupation and industries of employment of residents (NOMIS-Official Labour Market Statistics Local Authority Profile- Tower Hamlets, 2014)
- Average gross weekly pay (NOMIS-Official Labour Market Statistics Local Authority Profile- Tower Hamlets, 2014)
- Household income (LBTH Household Income in Tower Hamlets, 2014)

### **4.2 Description**

#### **4.2.1 Major industries and economy**

Tower Hamlets' economy was worth over £6 billion per annum in 2009/10<sup>4</sup>. The major industries of employment located in the borough are:

- Financial and insurance industries (30 per cent)
- Administration and support (11 per cent)
- Professional services (11 per cent)
- Information and communication (9 per cent)
- Health and social care (7 per cent)
- Education (6 per cent)

#### **4.2.2 Number of jobs in the borough**

Tower Hamlets is the fourth largest employment location in London. In 2012, approximately 240,000 jobs were located in the borough. Just over half of these were concentrated in Canary Wharf and the Isle of Dogs which had 129,000 jobs. The majority of employment is undertaken by employees commuting from outside the borough (LBTH Employment Strategy, 2011). This is reflected in the estimated daytime population of 428,000 people, despite the resident population being 284,000 for the same period. Conversely, about a fifth of jobs in the borough are filled by residents. Around 20 per cent of all employment in the borough (about 48,000 jobs) are based in the 'low pay' sectors (BRS in LBTH, 2014).

#### **4.2.3 Employment and unemployment of residents**

As of 2014, there were 209,700 residents of working age in the borough (those aged between 16-64 years old). Tower Hamlets has a higher proportion of residents of working age (73.8 per cent) compared to London (68.2 per cent) and the U.K (63.5 per cent) (ONS mid-year population estimates). Table 7 shows that of working age residents, 159,400 (77.7 per cent) are economically active which is a similar proportion, but slightly higher than London (77.0 per cent) and the U.K (77.4 per cent). The proportion of residents in employment (69.7 per cent) however is slightly less than for London (71.7 per cent) and Great Britain (72.7 per cent). The proportion of unemployed persons was

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<sup>4</sup> ONS annual population survey

estimated to be 8.9 per cent. This is higher than that for London (6.7 per cent) and Great Britain (6.0 per cent).

	Tower Hamlets (Numbers)	Tower Hamlets (%)	London (%)	Great Britain (%)
Economically Active	159,400	77.7	77.0	77.4
In Employment	143,000	69.7	71.7	72.7
Employees	125,000	61.2	58.5	62.2
Self Employed	17,800	8.3	12.8	10.1
Unemployed	13,900	8.9	6.7	6.0

**Table 7: Employment and unemployment of residents of Tower Hamlets for the period (April 2014 – March 2015). Source: NOMIS, 2015. (NB: unemployed data is model based).**

Table 8 shows that about 45,400 (22.3 per cent) people of working age were economically inactive over the same time period. This was slightly less, but a comparative proportion to London (23.0 per cent) and Great Britain (22.6 per cent). Notable differences were the greater proportion in Tower Hamlets who were economically inactive due to looking after family and/or the home (41.9 per cent of economically inactive persons).

	Tower Hamlets (Numbers)	Tower Hamlets (%)	London (%)	Great Britain (%)
Total	45,400	22.3	23.0	22.6
Student	13,400	29.5	32.2	26.5
Looking after family/home	19,000	41.9	31.0	25.4
Long-term sick	6,600	14.5	16.1	21.6

**Table 8: Economically inactive residents of Tower Hamlets for the period (April 2014 – March 2015). Source: NOMIS, 2015. (NB: samples for retired, temporary sick and discouraged were too small to include data).**

#### 4.2.4 Occupations of residents

Table 9 shows that of the 143,000 residents in employment, just over half (52.7 per cent) were classified as being managers, directors, senior officials; professional occupations; or associate professional and technical positions. This was slightly less than London overall (53.2 per cent) and substantially more than Great Britain (44.3 per cent).

	Tower Hamlets (Numbers)	Tower Hamlets (%)	London (%)	Great Britain (%)
Managers, Directors, Senior Officials; Professional Occupations; Associate Professional and Technical	75,300	52.7	53.2	44.3
Administrative & Secretarial Skilled Trades and occupations	21,800	15.3	17.9	21.4
Caring, leisure and other service occupations Sales and customer service occupations	25,100	17.5	14.8	17.1
Process Plant and machine operatives Elementary Occupations	20,800	14.5	14.1	17.2

**Table 9: Occupations of residents of Tower Hamlets. Source: ONS Annual Population Survey, in NOMIS Official Labour Market Statistics, 2015.**

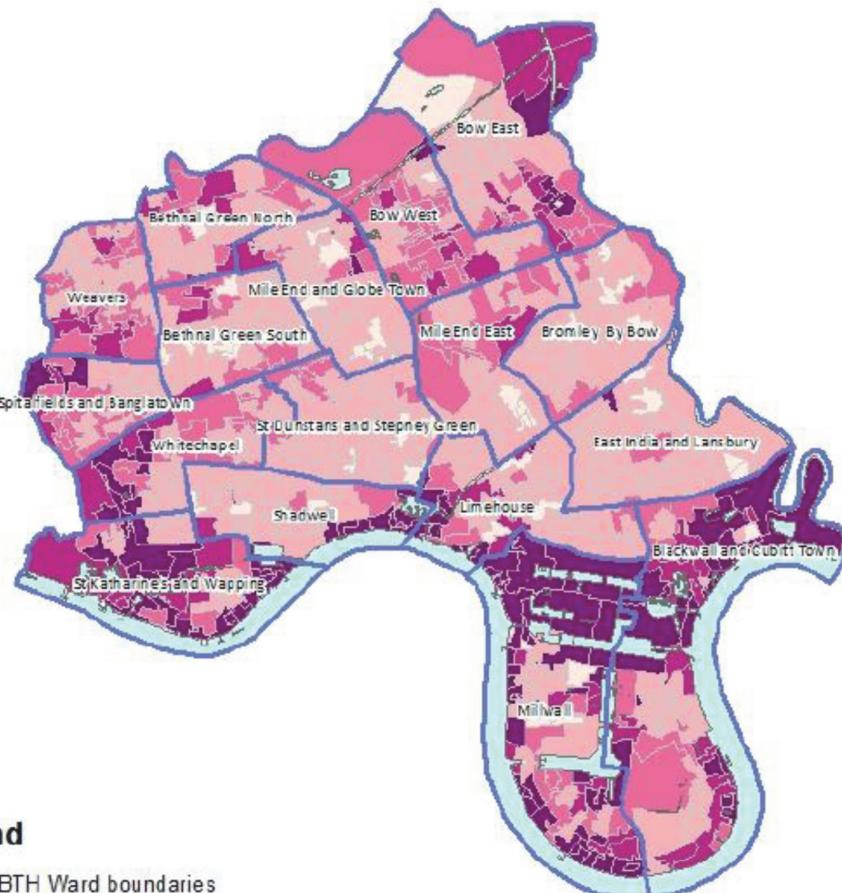
#### **4.2.5 Weekly earnings and household incomes**

The average gross earnings of residents in Tower Hamlets in 2014 was £670.4 per week. This was notably higher than for London (£617.8) and Great Britain (£520.8). Male residents in Tower Hamlets (£713.0) earn more than the London average for males (£617.8), while female residents (£574.9) earn the same as the London average for females (£574.9).

	Tower Hamlets (£)	London (£)	Great Britain (£)
Full-time workers	670.4	617.8	520.8
Male full-time workers	713.0	661.3	561.5
Female full-time workers	574.9	574.9	463.0

**Table 10: Gross weekly earnings of residents in Tower Hamlets in 2014. Source: NOMIS Official Labour Market Statistics, 2015.**

The median household income in the borough in 2013 was £30,805. This was £900 lower than the Greater London average of £31,700. 17 per cent of households had an annual income greater than £60,000, while another 17 per cent of households had an annual income of £15,000. Figure 6 shows the spatial distribution of median households across the borough.



### Legend

LBTH Ward boundaries

#### Median Income

- Below £20,000
- £20,001 - £30,000
- £30,001 - £40,000
- £40,001 - £50,000
- Above £50,000

**Figure 6: Median household income by area 2013. Source: CACI Paycheck, 2013 in LBTH Household Income Survey, 2013.**

### 4.3 Issues

- Tower Hamlets is a major location for employment in London, attracting a large daytime population of employees.
- Compared to Greater London and Great Britain, Tower Hamlets has a larger proportion residents of working age, of which a similar amount are employed. Further employed residents in Tower Hamlets earn more.
- However there is a higher proportion of unemployed persons, while the median household income is less than that for Greater London and Great Britain. There are also significant differences in household incomes across the borough. This highlights that there is a need to focus on those that are unemployed and households with incomes less than £20,000 to address income inequalities.
- This also highlights that there may be a need to diversify employment within the borough, particularly to match the skills of existing residents.

- It is important to continue to support the role of Tower Hamlets as a major attractor of employment and economic functioning.

#### **4.4 Data gaps and updates**

- There is minimal data about the number of people who work from home.
- There is minimal data on the need for different types of workspace and emerging industries.

## 5. Education

### 5.1 Indicators

The following indicators have been incorporated in the Sustainability Appraisal Framework:

- 5.2.1 Proportion of 16-18 year olds not in education, employment or training (NEETs) (Department for Education).
- 5.5.2 Proportion of people aged 16- 64 years old who have attained a NVQ Level Four or higher (Office for National Statistics in NOMIS Labour Market Survey, 2014; ONS Annual Population Survey).
- 5.2.3 Proportion of residents with no qualifications (Office for National Statistics, in NOMIS Labour Market Survey, 2014)
- 5.2.4 Education and skills deprivation (CLG Indices of Deprivation 2010).

### 5.2 Contextual characteristics

- 5.3.5 Need for School Places
- 5.3.6 Need for Early Years Places

### 5.3 Description

#### 5.3.1 Young people not in employment, education or training

In 2012, 4.9 per cent of 16 to 18 years olds in Tower Hamlets were not engaged in employment, education or training (NEET). This was an improvement of 0.1 per cent from 2011. On this measure, Tower Hamlets proportionally fares better than England, but not as well as the London average.

	2011 (%)	2012 (%)	Change 2011 to 2012
Tower Hamlets	5.0	4.9	- 0.1
London	4.5	4.7	+0.2
England	6.0	5.8	- 0.2

Table 11: Proportion of 16-18 year olds not in employment, education or training (NEET). Source: Department of Education.

#### 5.3.2 Attainment of NVQ Level 4

44.2 per cent of residents aged between 16 and 64 years old in Tower Hamlets had achieved a NVQ4 and above recorded in the period of in 2014. This was proportionally less than London (49.1 per cent) but higher than Great Britain (36.0 per cent).

#### 5.3.3 No qualifications

24,000 residents (12.1 per cent) in Tower Hamlets did not have a qualification in 2014. This was proportionally more than for both London (7.8 per cent) and Great Britain (8.8 per cent).

#### 5.3.4 Education and skills deprivation

In terms of the seven indices of deprivation, Tower Hamlets is least deprived in education and skills with only 1 LSOA being in the top 10 per cent most deprived areas in England and an additional 12 in the 10-20 per cent deprived in England.

#### 5.3.5 School Places:

##### Projections of the need for school places

Projections of the need for school places are provided by the GLA which uses a standard model for the majority of London LAs. The trends over the 10 year projection period can fluctuate in each annual round of projections. This can reflect the most recent birth data and variations to housing data.

The projections for 2015 show a continuing rise in need for places at both primary and secondary. The LA should continue to take a cautious approach to planning for additional school capacity. Whilst the projections of need are now showing a slower rate of increase at primary, it is possible that this could vary again either upwards or downwards in the future. For primary places, the projections beyond 2018/19 relate to projected rather than actual births so are less reliable than the short to medium term projections based on actual birth data.

### **Primary Schools**

It is projected that there will be 625 more Reception aged pupils in 2024/25 than in 2014/15. This means in addition to plans for extra capacity already agreed there will be a need for 7FE of more primary capacity in the period.

### **Secondary Schools**

It is projected that there will be 856 more 11 year olds in 2024/25 than in 2014/15. This means there will be a need for 20FE of more secondary capacity, with 7FE needed by 2021/22.

<http://modgov.towerhamlets.gov.uk/documents/q6200/Public%20reports%20pack%2008th-Sep-2015%2017.30%20Cabinet.pdf?T=10>

#### **5.3.6 Statutory Early Years Provision:**

In 2013 the Government introduced a new statutory duty on Councils to ensure adequate provision of 15 hours of childcare for disadvantaged two year olds. The borough's demographics mean that Tower Hamlets needs to provide the highest number of places. The Council is currently under providing by 1,398 places. In 2017 the duty will increase to 30 hours for disadvantaged 2 year olds and all 3 and 4 year olds, increasing the need to provide places.

#### **5.4 Issues**

- Fewer than London average adult residents hold higher qualifications or any qualifications.
- There are insufficient school places in the borough to meet current projected need.
- There are insufficient nursery places in the borough to meet current statutory duty for provision.

#### **5.5 Data gaps and updates**

- Future projections for Early Years Places, especially to meet future 3 and 4 year old requirements.

## **6. Safety**

### **6.1 Indicators**

The following indicators were used to characterise safety in the borough.

- Crime rates per 1000 of the population for key offences including burglary (Office for National Statistics Local Profiles).
- Percentage of people who thought crime was a problem in their local area (TNS-BMRB, Tower Hamlets Annual Residents Survey 2014).

- Crime deprivation (Indices of Deprivation for England 2010).
- Public Confidence in the Police (Tower Hamlets Community Safety Partnership, Strategic Assessment, 2013 – 2014)

## **6.2 Contextual characteristics**

No further contextual characteristics were used in this section.

## **6.3 Description**

### **6.3.1 Crime rates per 1000 people**

In Tower Hamlets the overall crime rate in 2011-2012 was 63.3 crimes per thousand people compared to 57.4 crimes per thousand people in London and 38.4 crimes per thousand people in England<sup>4</sup>.

The type of crime with the highest rate in 2010-2011 in Tower Hamlets was violence against the person with 27 crimes per 1,000 persons; this was greater than the London region which had a rate of 21 crimes per 1,000 persons.

Over the period 2006-2007 to 2010-2011 violence against a person in Tower Hamlets decreased by 1,412 offences overall. Over the period 2006-2007 to 2010-2011, wounding or other acts endangering life in Tower Hamlets increased by 159 offences overall.

### **6.3.2 Perceptions of crime**

31.0 per cent of people in Tower Hamlets thought that crime was a problem. This was the top personal concern for residents. Public confidence in the police currently stands at 60%

### **6.3.3 Crime deprivation**

The crime deprivation measure records crime rates for burglary, violence, theft and criminal damage. The crime deprivation in Tower Hamlets shows that all except the three wards Millwall, St Katharine's and Wapping, Mile End and Globe Town have LSOAs in the bottom 20% for crime deprivation.

## **6.4 Issues**

- The rate of crime is higher than that for London and England.
- Residents reported crime as the top concern in Tower Hamlets

## **6.5 Data gaps and updates**

- A more nuanced understanding of the trends with regards to different types of crime is required.

## **7. Health and wellbeing**

### **7.1 Indicators**

The following indicators were used to characterise population in the borough:

- 7.2.1 Life expectancy at birth for males and females (Compendium of Population health Indicators (HSCIC), Life Expectancy at Birth, Jan 2015, 200-1993 to 2011-13, in LBTH Health JSNA, 2015).
- 7.2.2. Percentage of people participating in regular sport or exercise (Sport England Active People Survey 6) and Rates of physical inactivity amongst Adults (Public Health Outcomes Framework)
- 7.2.3 Health Deprivation and Disability (Indices of Deprivation for England 2010).
- 7.2.1 and 7.2.3 Health inequalities (London Health Programmes, Life expectancy at birth by sex and ward, 1999/03 - 2006/10, Jan. 2013, in LBTH Joint Strategic Needs Assessment: Life and Health in Tower Hamlets)
- 7.3.4 % of children achieving a good level of development at the end of reception year; % of children in reception who are obese; tooth decay; vitamin D deficiency. LBTH JSNA 2015
- 7.3.5 % of adult carers who have as much social contact as they would like, as a proxy measure for social isolation (Public Health Outcomes Framework) and reduce the number of people who experience common mental health disorders

### **7.2 Contextual characteristics**

No further contextual characteristics were used in this section.

### **7.3 Description**

#### **7.3.1 Life expectancy**

Life expectancy in Tower Hamlets remains lower than the rest of the country but continues to improve. In 2011-2013 in Tower Hamlets, the average life expectancy of females of 82.6 years was lower than the national average for females of 83.1 years. The average life expectancy for males in Tower Hamlets of 77.5 years was lower than the national average of 79.4 years.

However the life expectancy gap between Tower Hamlets and the national average has improved. Between 2000 and 2011, the gap between females in Tower Hamlets and nationally, improved from 1.8 years to 0.5 years; and for males improved from 3.3 years to 1.9 years.

Health inequalities in the borough persist and are responsible for the notable gaps between the least and most deprived residents. These inequalities result in a difference of 3.3 years between the most and least deprived females in the borough, and 6.9 years for males.

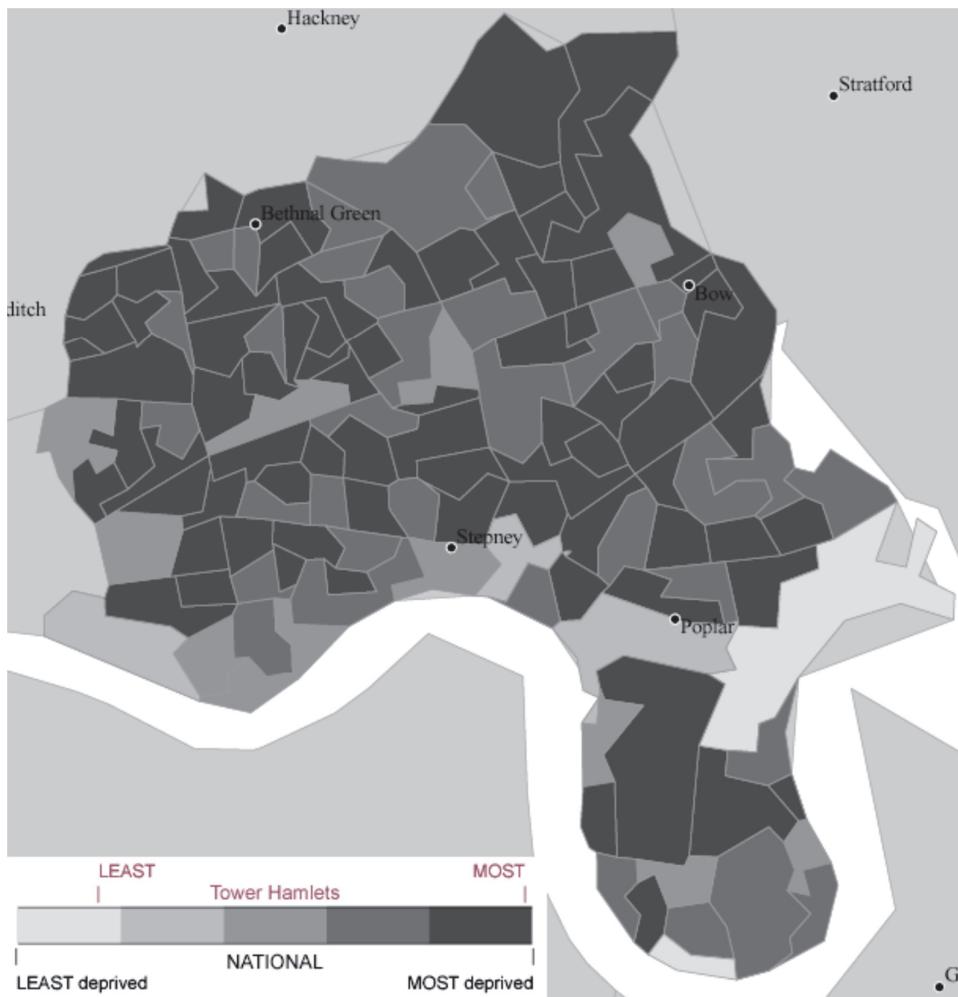
Compared to London, Tower Hamlets has the second highest premature death rate from circulatory disease (87 per 100,000), the second highest premature death rate from cancer (128.5 per 1000) and the second highest premature death rate (36.9 per 100,000) from respiratory disease (these conditions typically constitute 75% of all premature deaths (LBTH JSNA 2015).

#### **7.3.2 Participation in exercise**

Proportionately more residents in Tower Hamlets (38.5 per cent) were engaged in taking part in physical activity at least three days a week, than for London (36.0 per cent) and nationally (35.7 per cent). However in 2014 30% of adults were physically inactive, above the London average rate of 27%.

### 7.3.3 Health and disability deprivations

Health and disability deprivation measures incorporate years of potential life lost; comparative illness and disability ratio; acute morbidity; mood and anxiety disorders. Health and disability deprivation in Tower Hamlets is higher than average. This is also compounded by health inequalities within the borough. Ward life expectancies for males varied by 10 years, while for females there was a variation of 15 years of life expectancy.



**Figure 7: Geographic distribution of health and disability deprivation across Tower Hamlets. Source: Indices of Deprivation 2010 for England.**

### 7.3.4 Children's Health Issues (LBTH JSNA 2015):

- Only 55% of children achieve a good level of development at the end of reception year at school. The London average is 62%. (2013/14)
- 12.2% of children in Reception Year (4-5 year old) are obese (Joint 10th highest in the country)
- 5% of 5 year old children have experience of tooth decay compared to 33% for London and 28% nationally compared to the previous study there is evidence of deterioration of child oral health

- Local evidence indicates particularly high levels of Vitamin D deficiency in both mothers and children.

### **7.3.5 Mental Health (Tower Hamlets Mental Health Strategy) and Isolation**

- Tower Hamlets has a high prevalence of mental health problems: The fourth highest proportion of people with depression in London, the fourth highest incidence of first episode psychosis, and the highest incidence of psychosis in east London according to GP registers.
- In total there are approximately 30,000 adults estimated to have symptoms of a common mental health problem in the borough, with around 15,900 people known to their GP to have depression, and 3,300 known to have a serious mental illness, with a prevalence of c. 1150 people with dementia
- Using % of adult carers who have as much social contact as they would like, as a proxy measure for social isolation, in Tower Hamlets the figure is 29.8%, amongst the worst ten in London and below the London Average of 41.3%

### **7.4 Issues**

- Residents in the borough have lower life expectancies than average, but life expectancies are improving.
- There are significant health inequalities amongst residents in the borough. This is reflected in the variation of life expectancies between the most and least deprived residents.
- Health incomes for children in the borough are particularly bad and under the London average.
- High prevalence of mental health issues and social isolation.

### **7.5 Data gaps and updates.**

- There is a gap in evidence of the actual health impacts of new developments. Post-occupancy surveys would assist in filling this gap.
- There is an evidence gap regarding access to health facilities and their capacity with regards to population increase.

## 8. Air Quality

### 8.1 Indicators

The following indicators were used to characterise air quality in the borough and included in the Sustainability Appraisal Framework.

- 8.3.1 Levels of carbon dioxide (CO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), and dust and particulate matter (PM10) emissions (London Air Quality Network, 2015; LBTH Clear Zone Plan, 2010)

### 8.2 Contextual characteristics

- 8.3.2 Air quality impacts (King's College London, 2015)

### 8.3 Description

Tower Hamlets has three monitoring sites within the borough. These sites are operated and maintained by the London Air Quality Network (LAQN) and data is reported in real-time. In addition, the council also has 26 mini monitoring stations collecting data used to identify trends and hotspots, predict future pollutant levels, and monitor the success of the implementation of the air quality action plan.

#### 8.3.1 Levels of emissions

The borough exceeds air quality objectives for Oxides of Nitrogen (NO + NO<sub>2</sub> - collectively referred to as NOX) and particulate matter (PM10). As of 2015, the Council has a duty to monitor PM2.5. Table 12 shows pollution levels in 2014 measured against targets set by the Government's Air Quality Strategy, 2014.

		Was target achieved?		
		Blackwall	Mile End	Victoria Park*
Ozone	100 ug/m <sup>3</sup> as an 8 hour mean, not to be exceeded more than 10 times a year	Yes	-	-
Nitrogen Dioxide	200 ug/m <sup>3</sup> as a 1 hour mean, not to be exceeded more than 18 times a year	Yes	Yes	Yes
Nitrogen Dioxide	40 ug/m <sup>3</sup> as an annual mean	No	No	Yes
	Overall are objectives met?	No	No	Yes

Table 12 Air pollution levels in 2014 measured against targets set by the Government's Air Quality Strategy 2014. \*Victoria Park data is for 2015 as insufficient data available for 2014. Source: London Air Quality Network.

The borough has been declared an Air Quality Management Area. This is due to the high concentration of NOx and PM10 caused largely by traffic on major roads in the borough. Road transport has been identified as the largest source of emissions in Tower Hamlets<sup>5</sup>. Air quality hotspots as of 2010 were Aldgate, Limehouse and Bromley-by-Bow. There are a number of

<sup>5</sup> Defra (2007). The Air Quality Strategy for England, Scotland, Wales and Northern Ireland.

interventions to reduce sources of air pollution from transport such as encouraging more sustainable mode splits and supporting active transport and trip reduction<sup>6</sup>.

### **8.3.2 Air quality impacts**

Research undertaken at KCL studied the impacts of pollutants in the air on school children's respiratory health in Tower Hamlets. Small particulates (PM 2.5) alone are estimated to contribute to 102 deaths per year in Tower Hamlets.

## **8.4 Issues**

- Air pollution levels for the borough overall exceed targets set by the Government's Air Quality Strategy, 2014.
- Transport contributes to the majority of pollution in the borough. This is particularly so, near large arterial roads throughout the borough and increased exposure to populations living within proximity to major roads, especially vulnerable groups such as children, the elderly and those with existing medical conditions. Air pollution has significant implications on health and life expectancy and is said to be the second largest contributor to deaths after smoking.
- Major hotspots for poor air quality are on the Transport for London Road Network, over which the borough has limited direct control. This reduces the borough's ability to improve air quality from vehicular traffic.
- Measures taken to reduce pollution, particularly targeting transport will have wider benefits to health, wellbeing and open spaces.

## **8.5 Data gaps and updates**

- No data gaps have been identified.
- The LBTH air quality assessment may need to be revised to reflect recent data and trends.

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<sup>6</sup> LBTH. (2010). Clear Zone Plan.

## **9. Energy and Climate Change**

### **9.1 Indicators**

The following indicators were used to characterise energy and climate change in the borough and incorporated into the Sustainability Appraisal Framework.

- 9.3.1 Energy consumption by sector
- 9.3.2 Average consumption of domestic electricity (Neighbourhood Statistics, ONS, 2013)
- 9.3.4 Local carbon dioxide emissions per capita (Department of Energy and Climate Change, in ONS, Environment Profile 2013)
- 9.3.5 Number of households experiencing fuel poverty (Department of Energy and Climate Change, Fuel poverty sub-regional statistics 2013)

### **9.2 Contextual characteristics**

- 9.3.3. Consumption of domestic gas
- 9.3.6 Decentralised energy
- 9.3.7 Urban Heat Island

### **9.3 Description**

#### **9.3.1 Energy consumption by sector**

In 2011, a total of 5,262gWh of energy was consumed in the borough. Industry and commerce consumed the largest amount of energy per sector with 3,132gWh. This was almost double the usage of the domestic sector which consumed 1,156gWh. The transport sector consumed 972gWh.

#### **9.3.2 Efficiency and consumption of domestic energy**

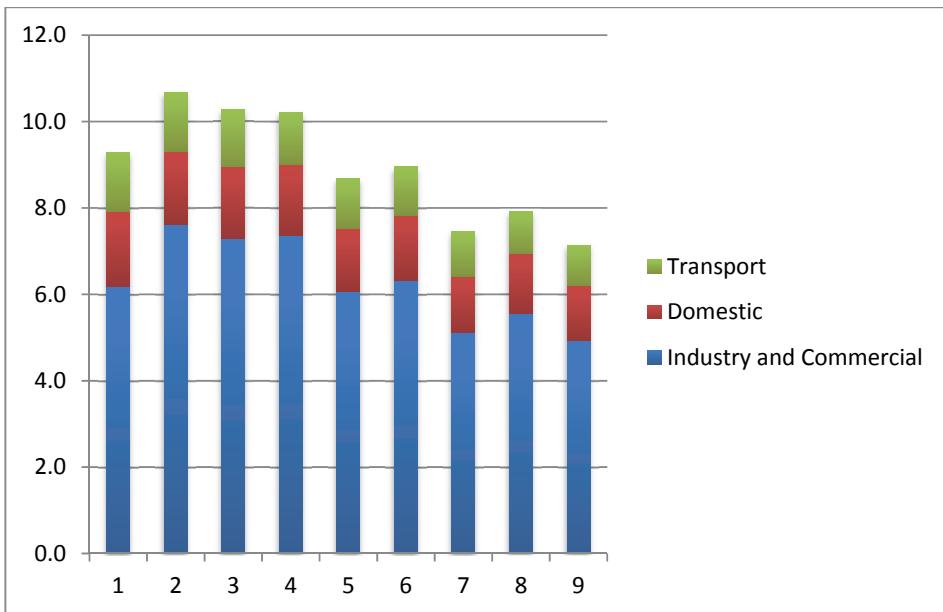
The average domestic electricity use for Tower Hamlets was 3,269kWh per meter point in 2011. This was lower than London (3,714kWh per meter point). Between 2009 and 2011 there was a reduction in domestic electricity usage of 19kWh per meter point in Tower Hamlets which was a greater reduction than the London average of 11kWh per meter point.

#### **9.3.3 Consumption of domestic gas**

In 2011, the average consumption of domestic gas for the borough was 9,853kWh per meter point. This was lower than London which had an average of 14,038kWh per meter point. In the two years between 2009 and 2011 there was a reduction in domestic gas usage of 812kWh per meter point in the borough which was a smaller decrease than the London average of 1,090kWh per meter point.

#### **9.3.4 Local carbon dioxide emissions**

The estimate of carbon dioxide emissions was 7.5 tonnes per person in the borough in 2011. While this represents a decrease of 1.2 tonnes over the preceding two years, Tower Hamlets still has a higher rate than the London average of 4.9 tonnes and England at 6.7 tonnes. The higher rate per capita in Tower Hamlets, can be somewhat accounted for by the high number of people that commute to the borough each day such as Canary Wharf, but are not resident in the borough and therefore there is a discrepancy in the amount of CO<sub>2</sub> per resident.



**Figure 8: Per capita Local CO<sub>2</sub> emission estimates; industry, domestic and transport sectors 2005-2013 (t CO<sub>2</sub> per person). Source: UK local authority and regional carbon dioxide emissions national statistics: 2005-2013.**

### 9.3.5 Fuel poverty

Fuel poverty is defined as spending more than 10 per cent of disposable income on heating to a minimal standard. In 2013, 7,813 households in Tower Hamlets were estimated to be experiencing fuel poverty. This equated to 7.6 per cent of all households. This was an increase from the previous year, in which 7,075 households experienced fuel poverty, equating to 7.3 per cent of all households in the borough.

### 9.3.6 Decentralised energy

There are limited opportunities for decentralised energy and heating within the borough. Besides lack of suitable sites, efforts are constrained by governance and logistical challenges of supply and demand between multiple stakeholders, high land prices for which energy facilities provide a relatively lower return than other uses. Incentives pursue implementation are also constrained, particularly against a broader policy landscape and uncertainty in meeting regional and national targets. There is also commercial uncertainty surrounding the lag time between planning and developing an energy supply; and having an adequate demand. Otherwise this risks increasing prices for end uses including residents.

### 9.3.7 Urban Heat Island <sup>7</sup>

Our average summer temperatures are predicted to keep rising, such that by the middle of this century, we can expect what are now considered heatwave temperatures (32 degrees daytime, 18 degrees nightime) in most summers.

London also generates its own microclimate, known as the Urban Heat Island (UHI), which can result in the centre of London being up to 10°C warmer than the rural areas around London. This can aggravate the effects of hot weather.

Summer heatwaves may make our homes, workplaces and public transport uncomfortable, and can have an effect on health, particularly of vulnerable people.

<sup>7</sup> <http://climatelondon.org.uk/lccp/>

The 2003 summer heatwave resulted in about 600 excess deaths in London. The hot temperatures in 2006 resulted in extremely high demands on London's power supply network and subsequent 'brown outs', due to the high cooling demand. Future increases in electricity demand for cooling could affect London's sustainability.

Identified ways to adapt to increase temperatures include London Mayoral targets:

- Increase tree cover by 5% by 2025 (from a baseline of 20% in 2008)
- Increase green cover in central London by 5% by 2030 and a further 5% by 2050 (this equates to c.30 hectares of new green cover if the boundary of the Central Activities zone is taken as a proxy for central London)

In addition there is a necessity to ensure heat is considered as part of new development proposals and energy saving or refurbishment retrofits of domestic properties, particularly within the social housing sector. Measures could include – restriction of glazing on south/west facades, appropriate wall insulation, ventilation and cooling, green roofs, walls and climbing plants, installation of water efficient taps.

#### **9.4 Issues**

- High levels of energy related emissions contribute to poor air quality in the borough.
- Fuel poverty remains a significant issue in the borough.
- There are barriers to delivering decentralised energy which are still to be overcome.
- CO<sub>2</sub> tends to dominate the direction of clean energy policy and actions. On the other hand the impacts of NO<sub>x</sub> are proportionately underrated in decisions.
- Predominance of the Urban Heat Island will increase as development increases

#### **9.5 Data gaps and updates**

- There is a lack of understanding of post-occupancy energy use and demand. Current decisions surrounding energy are based upon modelling of expected demand; however there is a discrepancy between modelling and real data. This understanding would provide more certainty to and build a stronger case for implementing decentralised and cleaner energy in the borough.
- Data needs to be updated with 2015 release for energy consumption which covers 2013 data.
- Need a better understanding of the effects of climate change and adaptation measures at the local Tower Hamlets level.
- Data is needed to measure the proportion of energy generated from renewable sources.
- Data is needed to quantify energy efficiency and adaptation of existing building stock as per DECC, 2012.
- Need a better understanding of the local heat island effects and whether there are particular local areas of heat concentration.

## **10. Transport and mobility**

### **10.1 Indicators**

The following indicators were used to characterise transportation in the borough.

- 10.3.1 Number of people killed or seriously injured in road accidents (LBTH Health Profile, 2014)
- 10.3.2 Length of cycle routes in the borough (LBTH Cycling Plan, 2009)
- 10.3.3 Journey to work by mode (2011 Census)

### **10.2 Contextual characteristics**

There are no contextual characteristics in this section.

### **10.3 Description**

#### **10.3.1 Reduction of people killed or seriously injured in road accidents**

There were 121 incidences of serious injuries and death on roads in Tower Hamlets in 2010-2011. This rate was worse than the English value.

#### **10.3.2 Length of cycle routes in the borough**

There are currently 53.3km of dedicated cycle routes in Tower Hamlets and 32.5km of pedestrian walkways. The Tower Hamlets Cycling Strategy 2015 outlines further improvements and growth in cycle routes – both segregated and on quietways.

#### **10.3.3 Journey to work by mode**

Tube, light rail and metro are the most popular modes to travel to work for residents of Tower Hamlets (37.32 per cent). This is significantly higher than for London (11.8 per cent). Conversely a lot less residents drive to work in Tower Hamlets (16.54 per cent) than for London (33.50 per cent). Similarly, car ownership is relatively low in the borough compared to London.

<b>Mode of Journey to Work</b>	<b>Tower Hamlets (%)</b>	<b>London (%)</b>
Underground, light rail, metro or tram	37.32	11.8
Driving a van or car	16.54	33.50
On foot	15.78	8.42
Bus, minibus or coach	10.39	11.12
Train	5.10	12.18
Bicycle	2.99	2.33
Passenger of van or car	1.38	2.51
Motorcycle, scooter or moped	1.13	1.42
Taxi or minicab	1.08	0.65
Other	0.64	0.42

Table 13: Journey to work by mode. Source: ONS Census 2011.

### **10.4 Issues**

- There is a need to alleviate current and future capacity on trains, DLR, buses and local roads.

- ‘Pinch points’ around the borough need to be addressed, particularly those identified in the Isle of Dogs.
- Parking is an on-going issue. There is a need to reduce parking as a disincentive to drive and subsequently alleviate congestion and improve air quality. This may include reviewing parking hours and parking associated with developments.
- There is a need to further encourage active modes of transport, particularly for local trips.
- There is a need to address road space conflicts between cyclists, pedestrians and motorists. This is particularly pertinent for ‘pinch points’ which have been identified through modelling.
- Locations of end of trip facilities such as bicycle parking and electric vehicle recharge points is also another issue given space constraints.
- Out of a total of 68 Public Health Outcome Framework measures of the health of the local population, certain transport related measures are estimated to contribute to a third of them. Therefore interventions to enhance sustainable and cleaner transport could also have significant health benefits.

#### **10.5 Data gaps and updates**

- A number of plans and strategies are currently being updated. These should be reviewed and incorporated in the SA and Local Plan evidence base. These include: The Road Safety Strategy and Parking Policy.
- There is no data for CO2 emissions from transport in the borough. This is required to be able to measure the reductions in line with EU and London targets.

# **11. Biodiversity**

## **11.1 Indicators**

The following indicators were used to characterise biodiversity in the borough and inform the biodiversity target for the Sustainability Appraisal Framework.

- 11.3.1 Protected species
- 11.3.2 Protected sites including SAC, SPA, and Ramsar sites (Tower Hamlets Biodiversity website).
- 11.3.3 Local natural sites (Tower Hamlets Biodiversity Action Plan, 2009).

## **11.2 Contextual characteristics**

- 11.3.4 Areas of deficiency in access to nature (2011 review of Sites of Importance for Nature Conservation).

## **11.3 Description**

### **11.3.1 Protected species**

There are a number of nationally protected and priority species in the borough. These include the Black Redstart, bats, and various more common wild plants and animals.

### **11.3.2 Protected sites**

There are no sites of European significance within the borough. There are no SACs, SPAs, Ramsar sites, SSIs or NNRs in the borough. The closest such sites are:

- Walthamstow Reservoir (SPA)
- Epping Forest (SAC)
- Lower Thames Marshes (SPA)

The HRA scoping identified possible impacts that the direction of the Local Plan and its development could theoretically have on these sites are:

- Walthamstow Reservoir (SPA)- possible impact from increase in population.
- Epping Forest (SAC) – possible impact from air pollution as a by-product of increased/certain developments in LBTH.
- Lower Thames Marshes (SPA) – Possible impact if water pollution were to increase from LBTH or as a result of increased population.

The HRA screening identifies the impacts are negligible considering the distance between the sites and the borough.

### **11.3.3 Local natural sites**

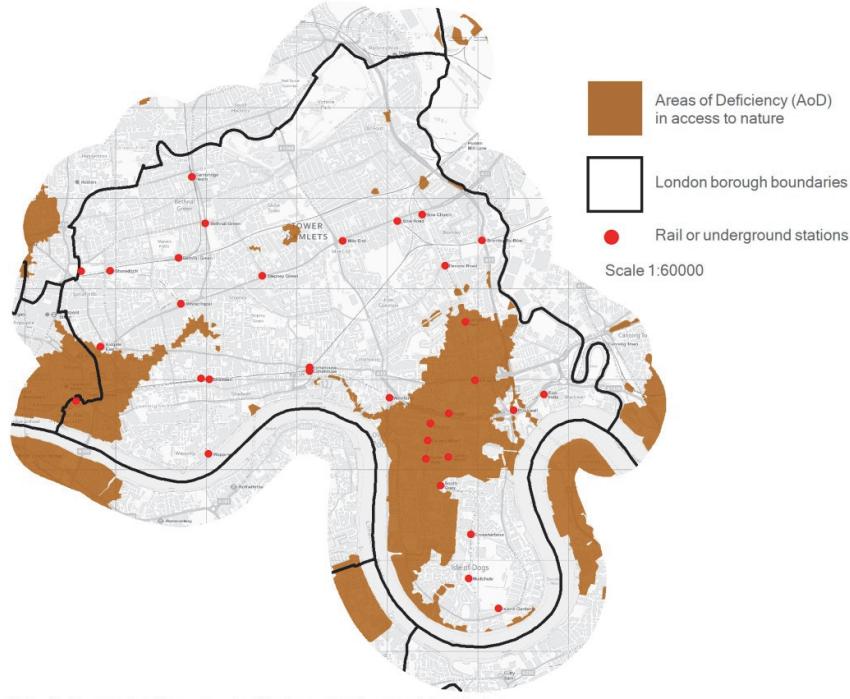
There are three Local Nature Reserves which are: Mudchute Park Farm, Tower Hamlets Cemetery Park and Ackroyd Drive.

There are 46 Sites of Importance for Natural Conservation. Under the Tower Hamlets Biodiversity Action Plan, 2009, there are Habitat Action Plans for gardens and grounds; parks, squares and burial grounds; rivers and standing water; and the built environment. The Biodiversity Action Plan also identifies areas within Tower Hamlets that have deficient access to nature sites. There are two large areas considered to have deficient access to Sites of Importance for Natural Conservation.

### **11.3.4 Areas of Deficiency in access to nature**

The Areas of Deficiency in access to nature (AODs) are defined in the London Plan Implementation Report *Improving Londoners' Access to Nature* as areas more than 1 kilometre walking distance from an accessible wildlife site of at least Borough importance.

The AODs in Tower Hamlets were mapped by Greenspace Information for Greater London around the wildlife sites identified in the 2011 review of Sites of Importance for Nature Conservation:



Areas of Deficiency in Access to Nature in Tower Hamlets  
Produced on behalf of the London Borough of Tower Hamlets © Crown copyright and database rights 2015 Ordnance Survey 100019288  
Produced by Greenspace Information for Greater London CIC www.gigl.org.uk

#### 11.4 Issues

- There are significant areas of the borough without sufficient access to nature.
- Increased development in the borough poses both problems and opportunities for wildlife.

#### 11.5 Data gaps and updates

- No data gaps identified.

## 12. Soil

### 12.1 Indicators

The following indicators were used to characterise soil and land quality in the borough.

- 12.3.1 Extent of soil sealing (LBTH Biodiversity Action Plan, 2014-2019)

### 12.2 Contextual characteristics

- 12.3.2 Contaminated Land (Tower Hamlets Contaminated Land Strategy, 2013)

### 12.3 Description

#### 12.3.1 Extent of soil sealing

Soil sealing refers to the covering of the ground by an impermeable material. It is one of the main causes of soil degradation. It can put biodiversity at risk, increase the risk of flooding and water scarcity and contribute to an urban heat island effect. It is an irreversible process.

While there is no specific indicator for amount of ground covered by impermeable surfaces in Tower Hamlets, land coverage provides a proxy. Over a third of Tower Hamlet's surface area is covered by buildings, roads and car parks; almost 40% is covered by gardens and landscaped areas around housing estates, schools, businesses etc; almost 15% is covered by water surface. 13% of the borough consists of parks and other public open spaces.

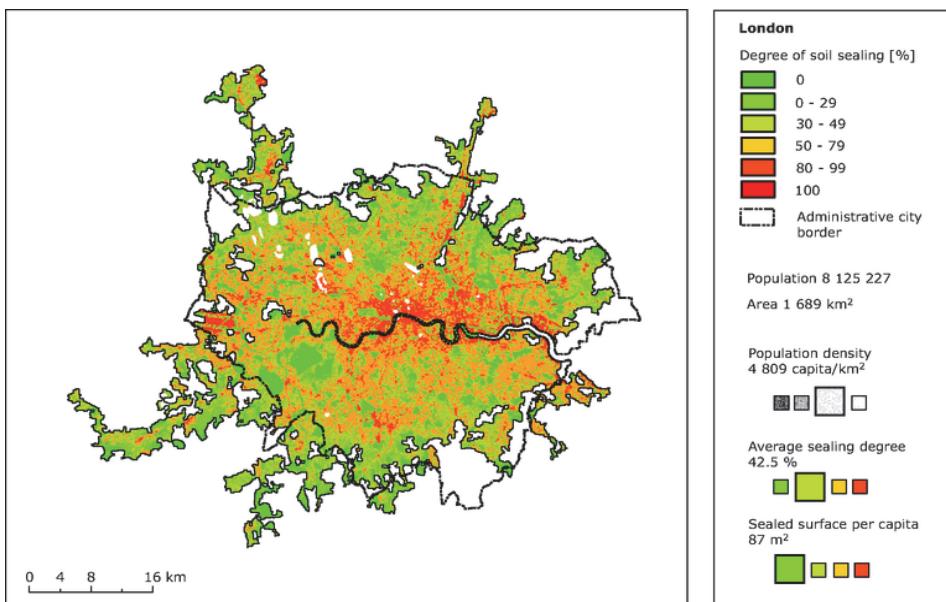


Figure: degree of soil sealing in London. Source: European Environment Agency.

#### 12.3.2 Contaminated Land

In 1994, a study of former industrial land in Tower Hamlets identified over 900 sites, many, as expected were located along the River Thames, particularly along the periphery of the Isle of Dogs. Other areas identified were the banks of the Limehouse Cut and Bow, particularly the area spreading south from Hampton Wick. The latter is the historic centre of the British chemical industry.

The extensive brownfield development in the borough, means that more development is taking place on contaminated land. The opportunity areas in the borough, especially the South Poplar Housing Zone, are in areas with high levels of contaminated land. Proper remediation will be required to enable development to take place.

#### **12.4 Issues**

- Remediation of land from industrial uses and other polluting uses where there is a change of use.
- Soil Sealing will have an impact on surface water flooding (see section 13).

#### **12.5 Data gaps and updates**

There is little local data soil quality.

## **13. Flood risk reduction and management**

### **13.1 Indicators**

The following indicators were used to characterise flooding and river catchments in the borough.

- 13.3.3 Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds (Environment Agency reported in LBTH AMR 2014/15)

### **13.2 Contextual characteristics**

- 13.3.1 Areas at risk of flooding (LBTH Level 2 Strategic Flood Risk Assessment, 2012).
- 13.3.2 Areas at risk of surface flooding (LBTH Local Flood Risk Strategy)

### **13.3 Description**

#### **13.3.1 Areas at risk of flooding**

The main risks of flooding events are posed from fluvial flooding from the Lea Valley and the Thames River. Figure 9 shows that the lower portion of the borough, most specifically the Isle of Dogs is within Flood Zone 3. This demarcates that this zone has a high probability of flooding if the existing flood defences, particularly the Thames Barrier were not managed in accordance to procedures.

Flood Zone 2 as also shown in Figure 9 covers the area around Tower Hamlets' council offices and East India. This area in Flood Zone 2 is at risk of flooding in an extreme fluvial event on the River Lee.

Tower Hamlets Surface Water Management Plan predicts that if a 1 in 100 year rainfall event was to occur, 11,500 residential properties and 3,800 non-residential properties could be at risk of surface water flooding of a depth greater than 0.03m.

#### **13.3.2 Surface Water Flooding:**

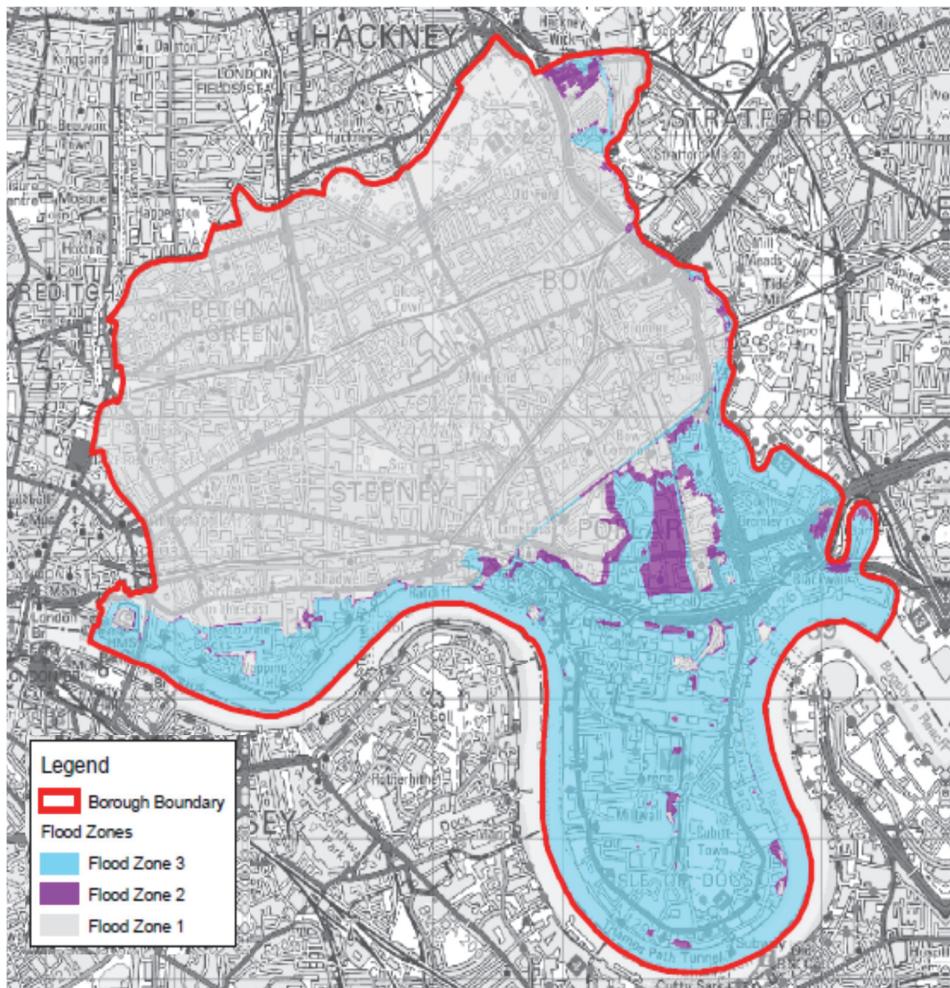
Surface water flooding was thought to pose the most significant risk of flooding within the borough. Through urbanisation, most of the surfaces in the borough are paved and surface water runoff from rainfall is drained away via piped systems and into the combined sewer system. The sewer system was built in the

Victorian period and even though surface water helps keep the sewer clear, its capacity for rainwater is limited. Furthermore topographical low points and underground infrastructure, such as tunnels pose a further risk to surface water flooding.

There is one critical drainage area identified in Tower Hamlets Plevna Street and Launch Street however the Isle of Dogs is also considered at risk from Surface Level Flooding, especially the potential to exceed the capacity of the drainage network

#### **13.3.3 Planning permissions granted contrary to flooding advice**

In 2013/14, 1 application was granted contrary to flood advice from the Environment Agency. In the previous year 2012/13, 3 such applications were granted. In the past 6 years, all approved planning applications have met the sequential test for managing flood risk.



**Figure 9: Tower Hamlets Strategic Flood Assessment. Source Capita Symonds for LBTH.**

#### 13.4 Issues

- A considerable proportion of the borough is within flood zones.
- The Isle of Dogs is at significant risk of surface water flooding
- Management of river ways and flood management require cooperation from multiple boroughs and tiers of government.

#### 13.5 Data gaps and updates

- Flood impacts on people and property may need to be revised to take account of new developments and any associated and accumulated change in exposure to flooding.

## **14. Water resources and use**

### **14.1 Indicators**

The following indicators were used to characterise water use and quality in the borough.

- 14.3.1 Biological river quality (LBTH, AMR, 2013/14).

### **14.2 Contextual characteristics**

No further contextual characteristics in this section.

### **14.3 Description**

#### **14.3.1 Biological water quality**

Canals and rives in Tower Hamlets have little marginal vegetation and suffer at times from poor water quality and invasive non-native species. For the 3 years between 2011/12 to 2013/14 the quality of the Lower Lea has remained unchanged. The quality of the water is reported as moderate, its chemical status is moderate and ecology is poor.

### **14.4 Issues**

- Water quality is poor and not improving.

### **14.5 Data gaps and updates**

No data set found pertaining to per capita or household consumption of daily water use.

## **15. Waste**

### **15.1 Indicators**

The following indicators were used to characterise waste in the borough:

- 14.3.1 Amount of residual water per household (DEFRA in ONS, 2013)
- 14.3.2 Proportion of household waste recycled or composted (DEFRA)

### **15.2 Contextual Characteristics**

There are no contextual characteristics in this section.

### **15.3 Description**

#### **15.3.1 Residual waste**

	<b>2012/1 3</b>	<b>2013/1 4</b>	<b>2014/1 5</b>
	418.22	418.05	438.66

**Table 14 Residual household waste per household. Source: Waste Data Flow.**

#### **15.3.2 Household waste sent for reuse, recycling or composting**

	<b>2012/1 3</b>	<b>2013/1 4</b>	<b>2014/1 5</b>
% Dry Recycling	25.78	26.07	26.43
% wet recycling	1.60	1.63	1.7

**Table 15 % of recycled waste. Source: Waste Data Flow.**

The Tower Hamlets dry recycling rates are amongst the highest in London, however the wet recycling rate is the third lowest in London, with some authorities reaching 22%. However this is due to the relatively small number of gardens in the borough and therefore low levels of garden waste.

### **15.4 Issues**

- The Council's recycling rates are below the London average, but rising steadily. The wet recycling rate is particularly low
- Our current safeguarded waste sites are both in areas transitioning away from industrial use and into residential use through their inclusion within the Poplar Riverside Housing Zone and the Fish Island area of the LLDC. The resulting increasing land values, as well as regional and local housing targets, creates pressure for alternative use for these sites.

### **15.5 Data gaps and updates**

- There is minimal data pertaining to waste post-2011.

## 16. Noise

### 16.1 Indicators

The following indicators were used to characterise noise in the borough:

- 16.3.1 The rate of complaints about Noise (Public Health Outcomes Framework)

### 16.2 Contextual characteristics

- 16.3.1 Number of noise complaints received by the borough

### 16.3 Description

#### 16.3.1 Noise Complaints

The Chartered Institute of Environmental Health calculates the rate of noise complaints per thousand of population for all London boroughs. In 2013/14 in Tower Hamlets this was 22%, amongst the highest in London and above the London average of 17.4%.

The below table provides details of the noise complaints the Council has received over the last 5 years. The majority of which are from construction noise.

Category	Nov 10 - Oct 11 Year 1	Nov 11 - Oct 12 Year 2	Nov 12 - Oct 13 Year 3	Nov 13 - Oct 14 Year 4	Nov 14 - Oct 15 Year 5	Total
Noise - commercial premises	237	147	166	162	146	858
Noise - construction/demolition sites	415	312	318	354	329	1728
Noise - industrial, warehousing/distribution premises	6	4	1	20	17	48
Noise - leisure/recreation premises	66	31	72	45	24	238
Noise - other residential premises	0	0	0	0	2	2
Noise - single family houses	0	0	0	0	1	1
OOH noise - commercial premises	52	62	41	41	52	248
OOH noise - industrial, warehousing/distribution premises	2	4	2	5	7	20
OOH noise - leisure/recreation premises	92	49	92	36	44	313
OOH noise - on-licensed premises	0	0	0	0	8	8
OOH noise - vehicles machinery equipment including buskers	0	0	0	0	37	37
OOH noise construction/demolition sites	294	85	70	47	115	611

Total	1164	694	762	710	782	4112
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#### **16.4 Issues**

- High complaints indicates a higher than average level of noise in the borough.

#### **16.5 Data gaps and updates**

- This comparative indicator data is calculated, not hard data.

## 17. Town Centres

### 17.1 Indicators

The following indicators were used to characterise town centres in the borough:

- 17.3.3 Number of junk food outlets per secondary school (LBTH Health JSNA, 2015)
- 17.3.1 Town Centre Vacancy Rates

### 17.2 Contextual characteristics

- 17.3.2 Description of town centres and retail

### 17.3 Description

#### 17.3.1 Town Centre Vacancy Rates:

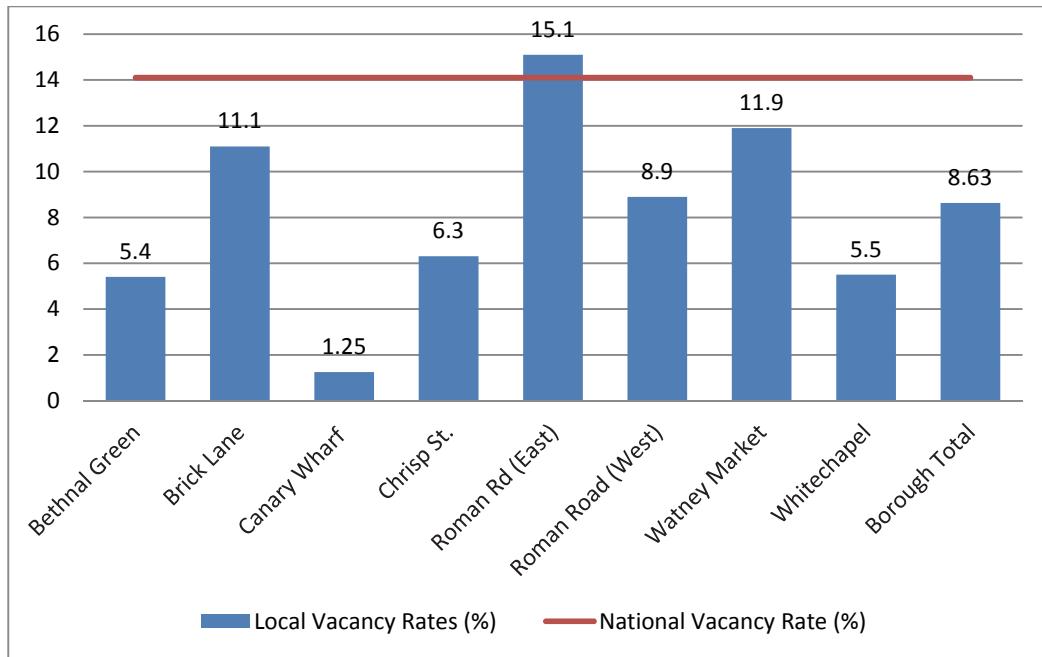


Table 16 2014/15 Town Centre Vacancy Rates. Source: LBTH Survey

#### 17.3.2 Description of town centres and retail

There were 14,945 businesses trading in the borough in 2014. Since 2010, this was an increase of 28.9 per cent in the number of businesses trading compared to a decline of 17.4 per cent in London. Beyond Canary Wharf, retail in Tower Hamlets is not characterised so much by anchor stores. Retail in town centres tends to be characterised by independent retail including: convenience stores, beauty salons, takeaways and local businesses.

#### 17.3.3 Takeaways, betting and loan shops

There is a high density of 'junk food' outlets. There are 42 junk food outlets per secondary school which is the second highest in London.

### 17.4 Issues

- Levels of fast-food outlets, betting shops and payday loan stores are higher than ideal and have socio-economic and health implications.

- The consequences of pursuing higher residential in town centres is unknown. This relates particularly to active street frontages and retaining a mix of viable uses within town centres. This also relates to how to protect general shops of less than 150m<sup>2</sup> as such spaces can also be converted into residential.
- There is an increasing demand for restaurants and there is also potential for more leisure and community services to be located in town centres.

## **17.5 Data gaps and updates**

- No known data gaps.

## **18. Heritage, Archaeology and Design**

### **18.1 Indicators**

The following indicators were used to characterise population in the borough.

- 18.3.1 Number of Heritage Listed Buildings (LBTH Conservation website)
- 18.3.2 Number of Scheduled Ancient Monuments (LBTH Conservation website)
- 18.3.3 Number of war memorials (LBTH Conservation website)
- 18.3.4 Number of Conservation Areas and Registered Historic Parks and Gardens (MAGIC)
- 18.3.5 Number of sites and aspects on the Heritage at Risk register (Historic England's Heritage at Risk register).

### **18.2 Contextual characteristics**

- 18.2.1 Archaeology
- 18.2.2 Views
- 18.2.3 Daylight, sunlight and wind

### **18.3 Description**

#### **18.3.1 Heritage Listed Buildings**

Within the borough there are over 2,000 Listed Buildings a list of these can be found on the LBTH conservation website. There are:

- 13 Grade I Buildings that are of exceptional national interest. These include the Tower of London, Tower Bridge and Christ Church Spitalfields.
- Approximately 40 Grade II\* buildings of special interest. These include Wapping Hydraulic Pumping Station.
- Around 2,000 Grade II buildings of special interest.

#### **18.3.2 Scheduled Achievement Monuments (SAMs)**

Brunel's Great Eastern ship slipway in Millwall has recently been declared a SAM. Other SAMs are Three Colt Bridge SAM and Parnell Road Bridge SAM. An up to date map of these can be found on the LBTH Conservation website

#### **18.3.3 War memorials**

As of August 2015, there were 44 war memorials in the borough. A list of these can be found on the LBTH Conservation website.

#### **18.3.4 Conservation Areas**

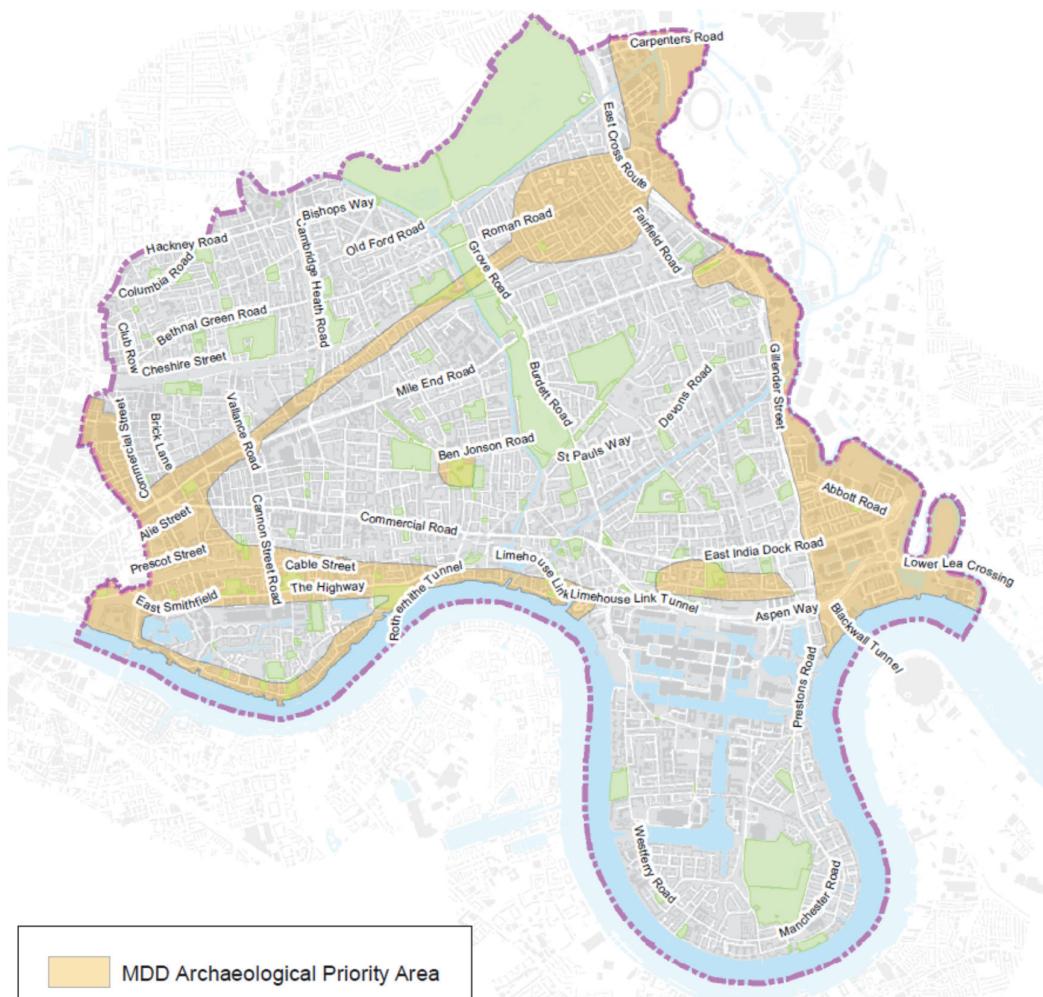
As of August 2015, there were 58 Conservation Areas within the borough. A list of these and respective character appraisals and guidelines about how the character can be conserved can be found on the LBTH Conservation website.

#### **18.3.5 Heritage at Risk**

35 heritage sites and aspects are registered on Historic England's Heritage at Risk Register. These include 28 listed buildings, 6 conservation areas and 1 SAM.

#### **18.3.6 Archaeology:**

The borough has large areas of Archaeological Priority. These are highlighted on the map below. Many of the areas of Archaeological Priority coincide with opportunity areas and consideration will have to be given as to how to preserve the archaeological heritage alongside supporting development.



### 18.3.7 Views:

The London Plan designates 27 views across London. Tower Hamlets regularly responds to planning applications which could impact on four of these views:

- View 5: Greenwich Park to Central London
- View 10: Tower Bridge
- View 24: Island gardens, Isle of Dogs to Royal Naval College
- View 25: The Queen's Walk to Tower of London

### 18.3.8 Daylight, Sunlight and Wind

Modelling on individual sites has indicated increasing sunlight, daylight and wind effects with new development sites. A number of rights to light issues have also prevented development from coming forward. However the borough has no borough wide modelling of these factors or the potential impact from development.

## **18.4 Issues**

- High levels of development and associated drivers of land prices and population growth, place pressure on heritage conservation. This pressure is compounded by the borough's location on the city fringe which has a mass of tall buildings. To some extent this may set a precedent for further tall buildings nearby in Tower Hamlets. The demand for development can result in less consideration to the impact of appropriate scale of new buildings on the wider area.
- Conserving the use of building uses that are in decline such as public houses being converted for other uses such as residential is also a matter that needs to be noted.
- Trans-boundary matters should be noted and the impact that development in Tower Hamlets may have on heritage in other boroughs. Such examples include sight lines from General Wolfe in Greenwich and Island Gardens which form part of the Greenwich world heritage site, and protecting the background of the Tower of London are such examples.

## **18.5 Data gaps and updates**

- There should be clearer strategic understanding of where tall buildings should be located in the borough to minimise impacts on heritage.
- The LBTH Conservation Strategy 2009 was last updated to align with the Local Development Framework and Core Strategy. No necessary updates are foreseen.
- Further borough wide data is required on the sunlight, daylight and wind effects of proposed development, especially in high density development.
- The London Plan evidences views of strategic importance to London, however Tower hamlets has no local evidence on locally important views.

## **19. Open space**

### **19.1 Indicators**

The following indicators were used to characterise open space and landscape in the borough.

- 19.3.1 Number of open spaces classified as Green Flag standard (LBTH Annual Monitoring Review 2014/15)
- Open space (hectares) per 1,000 people (LBTH, Local Monitoring Report, 2012/13)

### **19.2 Contextual characteristics**

There are no contextual characteristics in this section

### **19.3 Description**

#### **19.3.1 Green Flag standards**

There are over 120 parks and green spaces in Tower Hamlets. The following eight have received Green Flag Awards.

- Mile End Park
- Millwall Park
- Island Gardens
- King Edward Memorial Park
- Victoria Park
- Trinity Square Gardens
- Weavers Fields
- St George's Gardens

#### **19.3.2 Open space standards**

There were a total of 264.98 ha of open space in the borough in 2012/13. This equated to a total of 1.04 ha per 1,000 residents which was an increase from the previous year. The national average is 2.4 ha per 1,000 residents. Tower Hamlets Council has prepared a previous Green Grid which together with the Open Space Strategy guides the direction of open space provision and quality.

### **19.4 Issues**

- With increasing density, development and population conserving and creating new open space is a challenge.

### **19.5 Data gaps and updates**

- An update is being prepared for the Open Space Strategy.

## **20. Trans-boundary matters**

### **20.1 Indicators**

- No indicators were included in the Sustainability Appraisal Framework.

### **20.2 Description**

A number of the above elements of sustainability are trans-boundary in nature and require cooperation across boroughs and authorities. These include:

- Housing
- Flooding
- Waste- sites

The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Act 2004. It places a legal duty on local planning authorities.

### **20.3 Issues**

- Sustainability issues can be trans-boundary in nature.
- Addressing sustainability issues may require trans-boundary cooperation as per the duty to cooperate.
- The Local Plan and actions taken within the borough, may affect areas outside of the borough.

### **20.4 Data gaps and updates**

- Information may need to be collected from other boroughs, if an issue or the Local Plan may potentially affect areas outside of Tower Hamlets, most notably in neighbouring boroughs.





## Appendix E

### Review of Plans and Programmes



## Appendix E: Relevant policies, plans and programmes, and sustainability objectives

### International

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<b>United Nations Sustainable Development Goals (2015)</b>		
<p>The Sustainable Development Goals were set in September 2015 to replace and update the Millennium Development Goals. They cover all three dimensions of sustainable development: Economy, social and environment:</p> <ul style="list-style-type: none"> <li>• End poverty in all its forms everywhere</li> <li>• End hunger, achieve food security and improved nutrition and promote sustainable agriculture</li> <li>• Ensure healthy lives and promote well-being for all at all ages</li> <li>• Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all</li> <li>• Ensure availability and sustainable management of water and sanitation for all</li> <li>• Ensure access to affordable, reliable, sustainable and modern energy for all</li> <li>• Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</li> <li>• Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation</li> <li>• Reduce inequality within and among countries</li> <li>• Make cities and human settlements inclusive, safe, resilient and sustainable</li> <li>• Ensure sustainable consumption and production patterns</li> </ul>	<p>The UK Government has yet to localise the SDGs and determine a UK level plan for their implementation.</p>	<p>Through the SA and consultations, the Council should be mindful of SDG 16: <i>Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels</i></p> <p>The Local Plan should take account of all the goals, but with particular focus on SDG 11: <i>Make cities and human settlements inclusive, safe, resilient and sustainable</i></p> <p>And the following subtargets:</p> <p>11.1 By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums</p> <p>11.2 By 2030, provide access to safe,</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>• Take urgent action to combat climate change and its impacts</li> <li>• Conserve and sustainably use the oceans, seas and marine resources for sustainable development</li> <li>• Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss</li> <li>• Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels</li> <li>• Strengthen the means of implementation and revitalize the global partnership for sustainable development</li> </ul>		<p>affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons</p> <p>11.3 By 2030, enhance inclusive and sustainable urbanization and capacity for participatory, integrated and sustainable human settlement planning and management in all countries</p> <p>11.4 Strengthen efforts to protect and safeguard the world's cultural and natural heritage</p> <p>11.5 By 2030, significantly reduce the number of deaths and the number of people affected and substantially decrease the direct economic losses relative to global gross domestic product caused by disasters, including water-related disasters, with a focus on protecting the poor and people in vulnerable situations</p> <p>11.6</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
		<p>By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management</p> <p>11.7</p> <p>By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities</p>
<b>UN Framework Convention on Climate Change (UNFCCC) (1992) and Kyoto Protocol (1997)</b>		
<p>The Kyoto Protocol agreed in 1997 was designed to address the fact that greater cuts in emissions were needed to prevent serious interference with the climate. It has been ratified by over 166 countries. It sets legally binding emissions reductions targets on the developed countries that have ratified it (including the UK). In December 2007, the United Nations Framework Convention on Climate Change took place and brought together over 180 countries. Under the 2007 convention governments have to:</p> <ul style="list-style-type: none"> <li>• Gather and share information on greenhouse gas emissions</li> <li>• Launch national strategies for climate change</li> <li>• Co-operate in preparing for adaptation to the impacts of climate change.</li> </ul>	<p>Developed countries agreed to reduce their collective emissions of greenhouse gases by 5.2% from 1990 levels by the period 2008 to 2012.</p> <p>The UK target is to reduce emissions to 12.5% below 1990 levels by 2012 (note that the UK has imposed further targets upon itself since then).</p>	<p>The SA should assess the implications of the Local Plan on climate change emissions.</p> <p>The Local Plan should contribute towards reducing carbon emissions, in line with these and further targets.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>

## **European Union**

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>SEA Directive 2001</b> <b>Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment</b>		
Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.	The Directive must be applied to plans or programmes whose formal preparation begins after 21 July 2004 and to those already in preparation by that date.	Requirements of the Directive must be met in the SEA/SA of the Local Plan.  The Local Plan must be assessed in accordance to the Directive.
<b>Initial Directive of 1985 85/337/EEC and amendments codified by 2011/92/EU Assessment of the Effects of certain Public and Private Projects on the Environment</b>		
Initial Directive of 1985 85/337/EEC and amendments codified by 2011/92/EU Assessment of the Effects of certain Public and Private Projects on the Environment	No specific targets of relevance	Establishes the requirements to undertake Environmental Impact Assessment (EIA) of specified projects likely to have a significant impact on the environment

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<b>European Spatial Development Perspective (1999)</b>		
<p>The European Spatial Development Perspective is based on the EU aim of achieving balanced and sustainable development, in particular by strengthening environmentally sound economic development and social cohesion. This means, in particular, reconciling the social and economic claims for spatial development with an area's ecological and cultural functions and, hence, contributing to a sustainable, and at larger scale, balanced territorial development. This is reflected in the three following fundamental goals of European policy:</p> <ul style="list-style-type: none"> <li>• Economic and social cohesion</li> <li>• Conservation of natural resources and cultural heritage</li> <li>• More balanced competitiveness of the European territory.</li> </ul>	<p>There are no specific targets or indicators of relevance. Targets and measures for the most part deferred to Member States.</p>	<p>The SA should include objectives that complement the principles of the ESDP.</p> <p>Care should be taken when preparing the SA to make sure it encompasses the philosophy of both national and international strategy documents.</p> <p>The Local Plan needs to recognise the tensions between social, economic and environmental issues and include policies that encourage sustainable development.</p>
<b>Renewed EU Sustainable Development Strategy (2006) and 2009 review</b>		
<p>This document sets out a single coherent strategy on how the EU will meet long-standing commitments to sustainable development. This document presents a renewed version of the 2001 EU Sustainable Development Strategy (SDS). The aim of the SDS is to identify and develop actions to enable the EU to achieve continuous improvement of quality of life both for current and for future generations, through the creation of sustainable communities able to manage and use resources efficiently and to tap the ecological and social innovation potential of the economy, ensuring prosperity, environmental protection and social cohesion.</p>	<p>The key objectives of the strategy are:</p> <ul style="list-style-type: none"> <li>• Environmental protection;</li> <li>• Social equity and cohesion;</li> <li>• Economic prosperity; and</li> <li>• Meeting our international responsibilities.</li> </ul> <p>The guiding principles are:</p> <ul style="list-style-type: none"> <li>• Promotion and protection of fundamental</li> </ul>	<p>International objectives and targets relating to sustainability should be considered in the SA both when characterising the baseline and setting the SA objectives.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> <li>• rights;</li> <li>• Solidarity within and between generations;</li> <li>• Open and democratic society;</li> <li>• Involvement of citizens;</li> <li>• Involvement of businesses and social partners;</li> <li>• Policy coherence and governance;</li> <li>• Policy integration;</li> <li>• Use best available knowledge;</li> <li>• Precautionary principle; and</li> <li>• Making polluters pay</li> </ul>	
<b>Environment Action Plan to 2020, the 7<sup>th</sup> EAP that will be guiding European environment policy until 2020</b>		
<p>Guides European environment policy to 2020, but to provide a more long term direction , set s avision to 2050: "In 2050, we live well, within the planet's ecological limits. Our prosperity and healthy environment stem from an innovative, circular economy where nothing is wasted and where natural resources are managed sustainably, and biodiversity is protected, valued and restored in ways that enhance our society's resilience. Our low-carbon growth has long been decoupled from resource use, setting the pace for a safe and sustainable global society."</p>	<p>It identifies three key objectives:</p> <ul style="list-style-type: none"> <li>• to protect, conserve and enhance the Union's natural capital</li> <li>• to turn the Union into a resource-efficient, green, and competitive low-carbon economy</li> <li>• to safeguard the Union's citizens from environment-related pressures</li> </ul>	<p>International objectives and targets relating to environmental policy should be considered in the SA both when characterising the baseline and setting the SA objectives.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>and risks to health and wellbeing</p> <p>Four so called "enablers" will help Europe deliver on these goals:</p> <ul style="list-style-type: none"> <li>• better <b>implementation</b> of legislation</li> <li>• better <b>information</b> by improving the knowledge base</li> <li>• more and wiser <b>investment</b> for environment and climate policy</li> <li>• full <b>integration</b> of environmental requirements and considerations into other policies</li> </ul>	
<p><b>Directive 1996/62/EC: Air Quality Framework (1996) and Daughter Directives: (1999, 2000 &amp; 2002) - New Air Quality Directive 2008/50/EC</b></p>		
<p>The Framework Directive establishes a framework under which the EC will agree air quality limit values or guide values for specified pollutants in a series of Daughter Directives. The Directives contain limit values relating to the pollutants and it is necessary for these targets to be translated into UK legislation.</p> <p>This report by the Air Quality Expert Group (AQEG) looks at the scientific background to interactions and synergies between air quality and climate change from the perspective of policy measures developed to address both or either, focusing on the UK and Europe in the period to 2022.</p>	<p>Avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment.</p> <p>Thresholds for pollutants are included in the Directives. The list of atmospheric pollutants includes sulphur dioxide, nitrogen dioxide, particulate matter, lead, ozone, benzene, carbon monoxide, poly-aromatic hydrocarbons, cadmium, arsenic, nickel and mercury.</p>	<p>The SA framework should include an objective that addresses the improvement of air quality.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<b>EU Water Framework Directive (2000/60/EC)</b>		
<p>The purpose of this Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which:</p> <ul style="list-style-type: none"> <li>• Prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems</li> <li>• Promotes sustainable water use based on a long-term protection of available water resources</li> <li>• Aims to enhance protection and improvement of the aquatic environment, inter alia, through specific measures for the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances</li> <li>• Ensures the progressive reduction of pollution of groundwater and prevents its further pollution</li> <li>• Contributes to mitigating the effects of floods and droughts</li> </ul>	<p>Objectives for surface waters:</p> <ul style="list-style-type: none"> <li>• Achievement of good ecological status and good surface water chemical status by 2015</li> <li>• Achievement of good ecological potential and good surface water chemical status for heavily modified water bodies and artificial water bodies</li> <li>• Prevention of deterioration from one status class to another</li> <li>• Achievement of water-related objectives and standards for protected areas</li> </ul> <p>Objectives for groundwater:</p> <ul style="list-style-type: none"> <li>• Achievement of good groundwater quantitative and chemical status by 2015</li> <li>• Prevention of deterioration from one status class to another</li> <li>• Reversal of any significant and sustained upward trends in pollutant concentrations and prevent or limit input of</li> </ul>	<p>The SA should include an objective regarding the protection and improvement of water supply and water habitats.</p> <p>The plan should consider how the water environment can be protected and enhanced, and include policies that promote the sustainable use of water resources.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>pollutants to groundwater</p> <ul style="list-style-type: none"> <li>• Achievement of water related objectives and standards for protected areas</li> </ul>	
<b>Directive 2006/118/EC on the protection of groundwater against Pollution and Deterioration</b>		
<p>This Directive is designed to prevent and combat groundwater pollution. Its provisions include:</p> <ul style="list-style-type: none"> <li>• criteria for assessing the chemical status of groundwater criteria for identifying significant and sustained upward trends in groundwater pollution levels, and for defining starting points for reversing these trends</li> <li>• preventing and limiting indirect discharges (after percolation through soil or subsoil) of pollutants into groundwater.</li> </ul>	<p>Groundwater is considered to have a good chemical status when:</p> <ul style="list-style-type: none"> <li>• measured or predicted nitrate levels do not exceed 50 mg/l, while those of active pesticide ingredients, their metabolites and reaction products do not exceed 0.1 µg/l (a total of 0.5 µg/l for all pesticides measured);</li> <li>• the levels of certain high-risk substances are below the threshold values set by Member States; at the very least, this must include ammonium, arsenic, cadmium, chloride, lead, mercury, sulphate, trichloroethylene and tetrachloroethylene;</li> <li>• the concentration of any other</li> </ul>	<p>The SA should include an objective regarding the protection and improvement of groundwater quality.</p> <p>The plan should consider how the quality of groundwater can be protected and enhanced.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<p>pollutants conforms to the definition of good chemical status as set out in Annex V to the Water Framework Directive (<u>EN</u>);</p> <ul style="list-style-type: none"> <li>• if a value set as a quality standard or a threshold value is exceeded, an investigation confirms, among other things, that this does not pose a significant environmental risk</li> </ul>	
<b>Directive on the Assessment and Management of Flood Risks 2007/60/EC</b>		
<p>This Directive aims to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity. It requires Member States to assess whether all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas, and to take adequate and coordinated measures to reduce this flood risk.</p> <p>The Directive shall be carried out in co-ordination with the Water Framework Directive, most notably through flood risk management plans and river basin management plans, and also through co-ordination of the public participation procedures in the preparation of these plans.</p>	<p>No specific targets of relevance.</p>	<p>The SA should include an objective on reducing flood risk in the parts of the borough in flood zones 2 and 3.</p> <p>The LP should consider how to reduce flood risk in London and support flood management plans of London and the Thames Estuary.</p>
<b>The Waste Framework Directive (2008) Directive 2008/98/EC on waste</b>		

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>The aims of this directive are to:</p> <ul style="list-style-type: none"> <li>• Provide a comprehensive and consolidated approach to the definition and management of waste.</li> <li>• To shift from thinking of waste as an unwanted burden to a valued resource and make Europe a recycling society.</li> <li>• Ensure waste prevention is the first priority of waste management.</li> <li>• Provide environmental criteria for certain waste systems, to establish when waste ceases to be a waste (rather than significantly amending the definition of waste).</li> </ul>	No specific targets of relevance.	<p>The SA needs to incorporate objectives that address waste issues, e.g. minimisation and reuse etc.</p> <p>The plan should seek to promote the key objectives of prevention, recycling and processing of waste, conversion of waste to usable materials, and energy recovery.</p>
<p><b>Electricity Production from Renewable Energy Sources (2001) Directive 2001/77/EC</b></p> <p><b>Promotion of the use of energy from renewable sources (2009) Directive 2009/28/EC</b></p>		
<p>This directive, which amends and appeals earlier Directives 2001/77/EC and 2003/30/EC, creates a common framework for the use of renewable energy in the EU so as to limit greenhouse gas (GHG) emissions and promote cleaner transport. To do so, it sets targets for all EU countries with the overall aim of making renewable energy sources account for 20 % of EU energy and 10 % of energy specifically in the transport sector by 2020</p>	<p>The 2001 Directive sets a target for the EU of producing 22% of its overall electricity use from renewable energy sources by 2010 with each Member State having its own target (UK: 10%).</p> <p>The 2009 Directive establishes a common framework for the use of energy from renewable sources in order to limit greenhouse gas emissions and to promote cleaner transport. To this end, national action plans are defined,</p>	<p>The SA needs to incorporate objectives to promote the production and use of renewable energy.</p> <p>The plan should seek to promote the key objectives of meeting the UK's renewable energy target.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<p>as are procedures for the use of biofuels</p> <p>Each EU country is to make a national action plan for 2020, setting a share for renewable energy sources in transport, heating and the production of electricity.</p>	
<b>The Landfill Directive 1999</b> <b>Directive 99/31/EC on the landfill of waste</b>		
<p>This Directive aims to prevent or reduce adverse effects on the environment from landfilling of waste by introducing stringent technical requirements for waste and landfills.</p>	<p>Targets set by the directive are to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of biodegradable waste sent to landfill to 75% of the 1995 level by 2010.</li> <li>• Reduce this to 50% in 2013 and 35% by 2020.</li> </ul>	<p>The SA should include objectives to reduce the amount of waste sent to landfill.</p> <p>The LP should contribute towards meeting the targets set for increasing the amount of recycling and reducing waste.</p>
<b>EU Environmental Noise Directive (2002)</b> <b>Directive 2002/49/EC relating to the assessment and management of environmental noise</b>		
Defines a common approach to avoid, prevent and reduce the adverse effects	Principles of the directive include:	The SA should assess the effects

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>due to the exposure to environmental noise.</p> <p>Provides a basis for developing European wide measures to deal with noise emitted by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.</p>	<ul style="list-style-type: none"> <li>• Monitoring environmental problems.</li> <li>• Informing and consulting the public.</li> <li>• Addressing local noise issues.</li> <li>• Developing a long-term EU strategy.</li> </ul>	<p>of the plan on noise including from disturbance to local populations and also wildlife.</p>
<p><b>EU Habitats Directive (1992)</b>  <b>Directive 92/43/EC on the conservation of natural habitats and of wild fauna and flora</b></p>		
<p>Seeks to maintain biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.</p>	<p>Member States are required to take measures to maintain or restore at favourable conservation status, natural habitats and species. This includes Special Areas of Conservation and Special Protection Areas and it is usually accepted as also including Ramsar sites.</p> <p>Plans that may adversely affect the integrity of sites may be required to be subject to Appropriate Assessment under the Directive.</p>	<p>Include SA objectives to protect and enhance sustainability.</p> <p>Should include the conservation provisions of the Directive, and include objectives that address the protection of biodiversity.</p> <p>When required, a Habitats Regulations Assessment Screening exercise should be undertaken.</p> <p>There are no sites of European significance within the borough.      There are no SACs, SPAs, Ramsar sites, SSIs or NNRs in the borough.      The closest such sites are:</p> <ul style="list-style-type: none"> <li>• Walthamstow Reservoir (SPA)</li> </ul>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
		<ul style="list-style-type: none"> <li>• Epping Forest (SAC)</li> <li>• Lower Thames Marshes (SPA)</li> </ul> <p>LP must take into account the habitats and species that have been identified under this directive, and should include provision for the preservation, protection and improvement of the quality of the environment as appropriate.</p>
<b>EU Biodiversity Strategy to 2020</b>		
The Strategy aims to anticipate, prevent and attack the causes of significant reduction or loss of biodiversity at the source, which will help both to reverse present trends in biodiversity decline and to place species and ecosystems, including agro-ecosystems, at a satisfactory conservation status, both within and beyond the territory of the EU.	No specific objectives or indicators.	<p>Include SA objectives that address biodiversity.</p> <p>LP must consider biodiversity protection.</p>
<b>EU Conservation of Wild Birds Directive 2009</b> <b>Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended</b>		
This Directive relates to the conservation of all species of naturally occurring birds in the wild state in the European territory of the Member States to which the Treaty applies, including the designation of certain habitats as Special	<p>The preservation, maintenance, and re-establishment of biotopes and habitats shall include the following measures:</p> <ul style="list-style-type: none"> <li>• Creation of protected areas.</li> <li>• Upkeep and management in</li> </ul>	<p>Include measures in defining SA objectives for biodiversity.</p> <p>The Local Plan should ensure that the upkeep of recognised habitats</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>Protection Areas. It covers the protection, management and control of these species and lays down rules for their exploitation, and also the prevention of pollution / deterioration of habitats or any disturbances affecting the birds. The main provisions are the maintenance of favourable conservation status of all wild bird species, the identification and classification of Special Protection Areas for rare/vulnerable species and the establishment of schemes for the protection of wild birds.</p>	<p>accordance with the ecological needs of habitats inside and outside the protected zones.</p> <ul style="list-style-type: none"> <li>• Re-establishment of destroyed biotopes.</li> <li>• Creation of biotopes.</li> </ul>	<p>is maintained and not damaged from development.</p> <p>Avoid pollution or deterioration of habitats or any other disturbances affecting birds.</p>
<b>Aarhus Convention (Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters) (1998)</b>		
<p>The Convention addresses the need to guarantee the rights of access to information, public participation in decision-making and access to justice in environmental matters. There is a requirement for these provisions to be implemented in the Member States.</p>	<p>There are no specific objectives, targets or indicators of relevance.</p>	<p>The SA process has to comply with the principles of the Convention. Enough time needs to be provided for in the SA process to permit consultation in accordance with Aarhus requirements.</p> <p>The Local Plan Consultation Process will have to ensure we comply with the convention.</p>
<b>The Charter for the Conservation of Historic Towns and Urban Areas (International Council on Monuments and Sites, 1987)</b>		
<p>The charter concerns historic urban areas including cities, towns and historic centres or quarters, together with their natural and manmade environments. In order to be most effective, the conservation of historic towns and other historic urban areas should be an integral part of coherent policies of economic and social development and of urban and regional planning at every level.</p>	<p>There are no specific objectives, targets or indicators of relevance.</p>	<p>Include an SA objective to address protecting historic areas.</p> <p>The Local Plan should ensure the protection of historic areas of the</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
		borough.
<b>European Transport Policy for 2010: A Time to Decide (European Commission, 2001)</b>		
The policy outlines the need to improve the quality and effectiveness of transport in Europe. A strategy has been proposed which is designed to gradually break the link between transport growth and economic growth to reduce environmental impacts and congestion. The policy advocates measures that promote an environmentally friendly mix of transport services.	There are no specific indicators or targets of relevance.	<p>The SA framework should include objectives which address the need to reduce reliance on the private car and the overall level of road traffic whilst prioritising walking, cycling and public transport.</p> <p>The Local Plan should include policies to promote the use of sustainable transport.</p>
<b>UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972), The Athens Charter (1931 and The Venice Charter on the Conservation and Restoration of Monuments and Sites (1964)</b>		
These charters and convention aims to protect and enhance the world's cultural heritage. In terms of the UNESCO convention, each Party to the Convention recognizes the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage; and will ensure that effective and active measures are taken for the protection, conservation and presentation of the cultural and natural heritage situated on its territory.	There are no specific objectives, targets or indicators of relevance.	<p>The SA Framework should include objectives to protect cultural and heritage assets.</p> <p>The Local Plan should protect the borough's cultural and heritage assets, particularly the Tower of London a UNESCO World Heritage Site.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>Directive on Integrated Pollution Prevention and Control (96/61/EC)</b>		
The Directive provides an integrated approach to pollution prevention. It seeks to ensure a high level of protection to the environment through measures to prevent or reduce emissions to air, water and land. It addresses issues relating to waste, wastewater, energy use and environmental accidents. The Directive is based upon several principles including best available techniques.	There are no specific objectives, targets or indicators of relevance.	<p>The SA framework should include a number of objectives addressing environmental protection in particular recognising the need to prevent pollution to air, land and water.</p> <p>The Local Plan should include policies to protect and enhance the natural environment.</p>

## National Plans and Programmes

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>National Planning Policy Framework (NPPF) (2012) and associated National Planning Policy Guidance</b>		
The NPPF introduces a presumption in favour of sustainable development. The government's planning policy approach for delivering sustainable development is set out under the following key policy themes: 1. Building a strong, competitive economy 2. Ensuring the vitality of town centres 3. Supporting a prosperous rural economy	Presumption in favour of sustainable development. Delivering sustainable development: <ul style="list-style-type: none"> <li>• Building strong, competitive economy.</li> <li>• Ensuring vitality of town centres.</li> </ul>	Include objectives relating to: <ul style="list-style-type: none"> <li>• Strengthening the economy.</li> <li>• Vitality of town centres and the benefits of mixed use developments</li> </ul>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>4. Promoting sustainable transport        5. Supporting high quality communications infrastructure        6. Delivering a wide choice of high quality homes        7. Requiring good design        8. Promoting healthy communities        9. Protecting Green Belt land        10. Meeting the challenge of climate change, flooding and coastal change        11. Conserving and enhancing the natural environment        12. Conserving and enhancing the historic environment        13. Facilitating the sustainable use of minerals</p>	<ul style="list-style-type: none"> <li>• Promoting sustainable transport.</li> <li>• Supporting high quality communications infrastructure.</li> <li>• Delivering a wide choice of high quality homes.</li> <li>• Requiring good design.</li> <li>• Promoting healthy communities.</li> <li>• Meeting the challenge of climate change, flooding, and coastal change.</li> <li>• Conserving and enhancing the historic environment.</li> <li>• Facilitating the use of sustainable materials.</li> </ul>	<ul style="list-style-type: none"> <li>• Sustainable transport.</li> <li>• housing availability and quality.</li> <li>• good design.</li> <li>• health and well-being</li> <li>• climate change mitigation and adaption, to include minimising the risk of flooding.</li> <li>• conservation and enhancement of the natural environment.</li> <li>• conservation and enhancement of heritage assets.</li> </ul> <p>The Local Plan must conform with the NPPF.</p> <p>Set out clear economic visions for that particular area.</p> <p>Recognise town centres as the heart of their communities.</p> <p>To implement sustainable transport modes depending on nature/location of the site, to reduce the need for major road transport infrastructure.</p> <p>Enhance the provision of local community facilities and services by</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
		<p>supporting the expansion of electronic communications networks.</p> <p>Identify size, type, tenure and range of housing that is required in particular locations.</p> <p>Establish a strong sense of place to live, work and visit.</p> <p>Promote safe and accessible environments with a high quality of life and community cohesion.</p> <p>Use opportunities offered by new development to reduce causes/impacts of flooding.</p> <p>Recognise the wider benefits of biodiversity.</p> <p>Sustain and enhance heritage assets and put them to viable uses consistent with their conservation.</p> <p>A plan may be considered unsound if there has been no proper assessment of the significance of heritage assets in the area, and the plan does not contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
		Include policies which identify and safeguard mineral resources and associated infrastructure and promote the use of recycled/secondary materials prior to the extraction of primary materials.
<b>Localism Act 2011</b>		
<p>The Localism Act contains a number of proposals to give local authorities new freedoms and flexibility shifting power from the central state. In summary the Act gives:</p> <ul style="list-style-type: none"> <li>• New freedoms and flexibilities for local government;</li> <li>• New rights and powers for local communities, including neighbourhood planning</li> </ul>	No specific objectives or indicators.	<p>The SA Framework should be mindful of this Act as its principles will help to create vibrant, cohesive and empowered communities.</p> <p>The plan should be mindful of the key principles and powers of this Act, especially the need to incorporate Neighbourhood Plans into Local Plans.</p>
<b>UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)</b>		
<p>The strategy for sustainable development aims to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations. As a result of the 2004 consultation to develop new UK sustainable development strategy, the following issues have been</p>	Although there are no specific targets within this Strategy, it makes reference to targets set in related Public Service Agreements (PSA) and other relevant policy statements.	Ensure that the range of sustainability objectives reflect key principles and priorities and promote sustainable development and communities.

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>highlighted as the main priority areas for immediate action:</p> <ul style="list-style-type: none"> <li>• Sustainable consumption and production – working towards achieving more with less</li> <li>• Climate change and energy - confronting the greatest threat</li> <li>• Natural resource protection and environmental enhancement - protecting the natural resources on which we depend</li> <li>• From local to global - building sustainable communities -</li> <li>• Creating places where people want to live and work, now and in the future.</li> </ul> <p>The following principles will be used to achieve the sustainable development purpose, and have been agreed by the UK Government, Scottish Executive, Welsh Assembly Government, and the Northern Ireland Administration:</p> <ul style="list-style-type: none"> <li>• Living within environmental limits</li> <li>• Ensuring a strong, healthy, and just society</li> <li>• Achieving a sustainable economy</li> <li>• Promoting good governance</li> <li>• Using sound science responsibly</li> </ul> <p>The Shared Framework For Sustainable Development identifies the shared goals for the UK that devolved administrations need to work towards. They are:</p> <ul style="list-style-type: none"> <li>• Sustainable consumption and production</li> <li>• Climate change and energy</li> <li>• Natural resource protection and environmental Enhancement</li> <li>• Sustainable Communities</li> </ul>	<p>It also lists 68 high level UK government strategy indicators, which will be used to measure the success with which the above objectives are being met. The most relevant to this study are:</p> <ul style="list-style-type: none"> <li>• Greenhouse gas emissions: Kyoto target and CO2 emissions</li> <li>• CO2 emissions by end user: industry, domestic, transport (excluding international aviation), other</li> <li>• Renewable electricity: renewable electricity generated as a percentage of total electricity</li> <li>• Energy supply: UK primary energy supply and gross inland energy consumption</li> <li>• Water resource use: total abstractions</li> <li>• from non-tidal surface and ground water sources</li> <li>• Waste: arising by (a) sector (b) method of disposal</li> <li>• Bird populations: bird population indices: farmland birds (b) woodland birds (c) birds of coasts and estuaries (d) wintering wetland birds</li> <li>• Biodiversity conservation:</li> <li>• priority species status (b) priority habitat status</li> <li>• River quality: rivers of good (a)</li> </ul>	<p>The Local Plan should reflect and contribute to the national Sustainable Development Strategy principles and priorities</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> <li>• biological (b) chemical quality</li> <li>• Air quality and health: (a) annual levels of particles and ozone (b) days when air pollution is moderate or higher</li> </ul>	
<b>Sustainable Communities: Building for the Future (ODPM, 2003)</b>		
<p>This sets out a long-term national programme of how the Government intends to deliver sustainable communities. It focuses mainly on tackling housing supply issues in the South East, low demand in other parts of the country, and the quality of housing and public spaces.</p>	<p>The main sections are:</p> <ul style="list-style-type: none"> <li>• Sustainable communities;</li> <li>• Step changes in housing supply;</li> <li>• Decent homes; including the need to bring council homes up to a decent standard; and</li> <li>• Improvements to the local environment, particularly the public realm.</li> </ul> <p>It recognises that the success of communities relies on more than just housing and communities must develop economically, socially and environmentally.</p>	<p>Include objectives that seek to address housing supply, particularly affordable housing supply, and promote key environmental and sustainability issues in line with main objectives.</p> <p>The SA should acknowledge local action to meet local needs.</p> <p>It should recognise that housing should be provided for all sections of society.</p> <p>It should recognise that environmental improvements can improve quality of life.</p> <p>The SA Framework should be reviewed against these objectives .</p> <p>The Local Plan should build upon relevant elements of the Communities  Plan. The Local Plan</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
		<p>should not conflict with the national programme of action.</p> <p>The plan should encourage housing to be addressed by local partnerships as part of a wider strategy of neighbourhood renewal and sustainable communities.</p> <p>It should also encourage environmental enhancement to be central to regeneration solutions, including the use of green space networks as a basis for development and have due regard for landscape character and designations.</p>
<b>The Community Infrastructure Levy Regulations 2010 and amendments 2014</b>		
The Community Infrastructure Levy (the levy) is a tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area.	No specific objectives or indicators.	<p>The SA should consider the impact of CIL in delivering local infrastructure.</p> <p>In drafting, the Local Plan should take into account the current CIL.</p>
<b>Urban White Paper – Our Towns and Cities: The Future (ODPM, 2000)</b>		
The Urban White Paper sets out a vision for the future of towns and cities.	It identifies four steps to making “all	SA objectives should reflect the

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>urban areas places for people”:</p> <ul style="list-style-type: none"> <li>• Getting the design and quality of the urban fabric right.</li> <li>• Enabling all towns and cities to create and share prosperity.</li> <li>• Providing the quality services people need.</li> <li>• Equipping people to participate in developing their communities.</li> </ul> <p>This vision of urban living includes:</p> <ul style="list-style-type: none"> <li>• People living in attractive, well-kept towns and cities which use space and buildings well;</li> <li>• Good design and planning, which makes it practical to live in a more environmentally sustainable way, with less noise, pollution and traffic congestion;</li> <li>• Towns and cities able to create and share prosperity, investing to help all their citizens reach their full potential; and</li> <li>• Good quality services-health, education, housing, transport, finance, shopping, leisure and protection from crime that meet the needs of people and businesses wherever they are.</li> </ul> <p>As well as targets on crime, education attainment, health and unemployment it</p>	<p>general principles to achieve higher quality, more accessible, safer and sustainable urban environments.</p> <p>The Local Plan should reflect the general principles to achieve higher quality, more accessible, safer and sustainable urban environments. It should also seek to contribute to the supply of new housing on previously developed land</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>includes targets such as:</p> <ul style="list-style-type: none"> <li>• Better, safer and more reliable transport systems, leading to the increased use of public transport and reductions in road congestion by 2010;</li> <li>• Better housing with all social housing being of a decent standard by 2010 and with most improvement taking place in deprived areas;</li> <li>• A better environment with 60% of new housing provided on previously developed land or through conversions of existing buildings by 2008; 17% of underused land reclaimed by 2010;</li> <li>• Better designed buildings and places; and clean and more attractive streets.</li> </ul>	
<b>HOUSING</b>		
<b>Sustainable Communities: Homes for All (ODPM, 2005)</b>		
<p>This strategy sets out the Government's five-year programme for housing. Topics covered include proposals to expand home ownership and revive the UK housing market, affordable housing and support for first time buyers. It includes measures to improve supply and delivery while protecting the environment and action in low demand and growth areas; details of the Government's First Time Buyer, Key Worker and Homebuy schemes; and action on homelessness to halve numbers living in temporary accommodation by 2010 and addressing other management and tenure issues.</p>	<p>Targets include:</p> <ul style="list-style-type: none"> <li>• Maintain target that 60% of all new housing development should be built on brownfield land</li> <li>• Raise design standards, with the aim that a hundred more developments gain a Building for Life Award for Excellence</li> <li>• Improve minimum energy standards for</li> </ul>	<p>SA should include objectives that support the achievement of sustainable housing provision.</p> <p>Local Plan principles should reflect support for improving housing supply to relevant design standards and in an energy efficient manner.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>all new homes, reducing carbon emissions by around a further 25%</p> <ul style="list-style-type: none"> <li>• Establish a new Code for Sustainable Buildings to promote excellence in environmental performance</li> <li>• Raise the average energy efficiency of the whole of the residential housing stock by 20% compared with 2000.</li> <li>• Promote more sustainable buildings, saving energy, water and materials and helping to meet the target to cut UK carbon emissions by 60% by 2050:</li> <li>• Promote more sustainable, high quality design and construction, to reduce waste and improve resource efficiency.</li> </ul>	<p>The Local Plan should ensure adequate provision of new housing to meet future demand.</p>
<b>The Code for Sustainable Homes: Setting the Standard in Sustainability for New Homes (2008)</b>		
<p>This sets out the assessment process and performance standards required for the Code for Sustainable Homes.</p>	<p>The Code is a voluntary standard designed to improve the sustainability of new homes. The Code measures the sustainability of a home against nine design categories, rating the 'whole home' as a complete package. These categories are</p> <ul style="list-style-type: none"> <li>• Energy &amp; CO2</li> <li>• Emissions,</li> <li>• Pollution,</li> <li>• Water,</li> <li>• Health &amp; Wellbeing,</li> <li>• Materials,</li> </ul>	<p>Include objectives which promote sustainable development and seek to achieve higher levels of efficiency (e.g. in energy, water etc.) where appropriate.</p> <p>The Local Plan should take into account their roles in promoting the implementation of the Code for all residential development.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> <li>• Management,</li> <li>• Surface,</li> <li>• Water Run-off,</li> <li>• Ecology, and</li> <li>• Waste.</li> </ul>	
<b>CLIMATE CHANGE</b>		
<b>Climate Change Act (2008)</b>		
<p>The Act commits the UK to action in mitigating the impacts of climate change. It has two key aims:</p> <ul style="list-style-type: none"> <li>• To improve carbon management, helping the transition towards a low-carbon economy</li> <li>• To demonstrate UK leadership internationally, signalling a commitment to take our share of responsibility for reducing global emissions in the context of developing negotiations on a post-2012 global agreement at Copenhagen in December 2009 [and beyond].</li> </ul>	<p>Relevant commitments within the Act are:</p> <ul style="list-style-type: none"> <li>• The creation of a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad (against 1990 levels). Also a reduction in emissions of at least 34% by 2020.</li> <li>• A carbon budgeting system which caps emissions over five-year periods, to aid progress towards the 2050 target.</li> <li>• The creation of the Committee on Climate Change - a new independent, expert body to advise the Government on the level of carbon budgets and on where cost-effective savings can be made.</li> <li>• The inclusion of International aviation and shipping emissions in</li> </ul>	<p>The SA Framework should include objectives that address climate change issues including flooding and the need to reduce greenhouse gas emissions.</p> <p>The plan should ensure that policies are in place to encourage the reduction in CO2 emissions whilst promoting sustainable economic growth.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>the Act or an explanation to Parliament why not - by 31 December 2012.</p> <ul style="list-style-type: none"> <li>• Further measures to reduce emissions, including: powers to introduce domestic emissions trading schemes more quickly and easily through secondary legislation; measures on biofuels; powers to introduce pilot financial incentive schemes in England for household waste; powers to require a minimum charge for single-use carrier bags (excluding Scotland).</li> <li>• New powers to support the creation of a Community Energy Savings Programme.</li> </ul>	
<b>Stern Review of the Economics of Climate Change (2006)</b>		
<p>The review examines the evidence on the economic impacts of climate change and explores the economics of stabilising greenhouse gases in the atmosphere. The second part of the review considers the complex policy challenges involved in managing the transition to a low-carbon economy and in ensuring that societies are able to adapt to the consequences of climate change. The document clearly identifies that adaptation is the only available response for impacts that will occur over the next few decades.</p>		<p>The SA Framework should include an objective relating to the reduction in greenhouse gas emissions.</p> <p>The plan should ensure that policies are in place to encourage the reduction in CO2 emissions whilst promoting sustainable economic growth.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p><b>UK Carbon Plan (2011)</b></p> <p>The Carbon Plan sets out the Government's plans for achieving the emissions reductions committed to in the first four carbon budgets, on a pathway consistent with meeting the UK's 2050 target. The publication brings together the Government's strategy to curb greenhouse gas emissions and deliver climate change targets.</p>	<p>The Carbon Plain includes the following targets:</p> <ul style="list-style-type: none"> <li>• Commitment to reduce carbon emissions by at least 80% by 2050.</li> </ul>	<p>The SA Framework should include objectives that complement the priorities of this Plan</p> <p>It should be ensured that reducing carbon emissions is a key theme throughout the plan</p> <p>.</p>
<p><b>Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report (2009)</b></p> <p>The report examines ways in which the land use planning system can help biodiversity adapt to climate change. Strategies are identified that enable LDFs to deliver against the Department for Food, Environment and Rural Affairs' (Defra) 12 core adaptation goals:</p> <ol style="list-style-type: none"> <li>1. Conserve existing biodiversity             <ol style="list-style-type: none"> <li>1a Conserve protected areas and other high quality habitats</li> <li>1b Conserve range and ecological variability of habitats and species</li> </ol> </li> <li>2 Reduce sources of harm not linked to climate</li> <li>3 Develop ecologically resilient and varied landscapes             <ol style="list-style-type: none"> <li>3a Conserve and enhance local variation within sites and habitats</li> <li>3b Make space for the natural development of rivers and coasts</li> </ol> </li> <li>4 Establish ecological networks through habitat protection, restoration and creation</li> <li>5 Make sound decisions based on analysis</li> </ol>		<p>The SA should refer to specific guidance in the document for using SA to improve the ability of biodiversity to adapt to climate change.</p> <p>Development of the plan should include recommendations from this report. Biodiversity assets should be protected from inappropriate development and i.e. use of buffer zones around sensitive sites.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>5a Thoroughly analyse causes of change        5b Respond to changing conservation priorities        6 Integrate adaptation and mitigation measures into conservation management, planning and practice</p>		
<b>The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)</b>		
<p>The programme recognises the challenges cities face in a changing climate – with higher population density “including a larger proportion of vulnerable groups, concentrated assets, infrastructure, transport systems, buildings, schools, hospitals and businesses are expected to be acutely impacted by increased severity and frequency of flooding, higher summer temperatures, heat waves, extreme weather events and increased pressure on water resources”</p>	<p>The report sets out visions for the following sectors:</p> <ul style="list-style-type: none"> <li>• Built Environment – “buildings and places and the people who live and work in them are resilient to a changing climate and extreme weather and organisations in the built environment sector have an increased capacity to address the risks and take the opportunities from climate change”.</li> <li>• Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.</li> <li>• Healthy and resilient communities – “a health service, a public health and social care system which are resilient and adapted to a changing climate. Communities and individuals, including the most vulnerable, are better prepared to cope with severe weather events and other impacts of climate</li> </ul>	<p>Include objectives which seek to promote the implementation of adaptation measures to make the Borough more resilient to a changing climate.</p> <p>The Local Plan should take account of the visions set out in the Programme.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>change. Emergency services and local resilience capability take account of and are resilient to, a changing climate”.</p> <ul style="list-style-type: none"> <li>• Agriculture and Forestry – “profitable and productive agriculture and forestry sectors that take the opportunities from climate change, are resilient to its threats and contribute to the resilience of the natural environment by helping maintain ecosystem services and protect and enhance biodiversity”.</li> <li>• Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides”.</li> <li>• Business – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change”.</li> <li>• Local Government – “Local government plays a central role in leading and supporting local places to become more</li> </ul>	
<b>ENERGY</b>		
Energy White Paper – Planning for our electric future (DECC, 2012)		

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
This White Paper sets out the Government's commitment to transform the UK's electricity system to ensure that our future electricity supply is secure, low-carbon and affordable.	15% renewable energy target by 2020 and 80% carbon reduction target by 2050.	<p>Include SA objectives to reduce carbon emissions and increase proportion of energy generated from renewable sources.</p> <p>The Local Plan should support renewable energy generation and encourage greater energy efficiency.</p>
<b>Building a Greener Future: Policy Statement (DCLG, 2007)</b>		
This report sets out the Government's proposals to reduce the carbon footprint of new housing development and indicates the Government's views on the importance of moving towards zero carbon in new housing. The report also explores the relationship between the planning system, Code for Sustainable Homes and Building Regulations in delivering ambitions for zero carbon and proposes a timetable for revising the Building Regulations in order to reach zero carbon development in all new housing in England & Wales.	<p>This Statement confirms the government's intention to achieve</p> <ul style="list-style-type: none"> <li>• 25% more energy efficient homes by 2010,</li> <li>• 44% more efficient homes by 2013 and</li> <li>• zero carbon (net carbon emissions should be zero per annum) homes by 2016.</li> </ul>	<p>Include objectives which seek to improve the energy efficiency of proposed developments and encourage uptake of renewable energy.</p> <p>The Local Plan should ensure residential development is zero carbon in line with targets.</p>
<b>The Energy Efficiency Opportunity in the UK (DECC, 2012)</b>		
<p>This is an Energy Efficiency Strategy aiming to realise the wider energy efficiency potential that is available in the UK economy.</p> <p>The Strategy identifies four barriers to energy efficiency which need to be overcome which include:</p> <ul style="list-style-type: none"> <li>• Embryonic markets.</li> </ul>	<p>The Strategy draws attention to maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.</p>	<p>Include SA objectives relating to energy efficiency and adaptation of the existing building stock.</p> <p>The Local Plan should seek to address the barriers identified within</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>• Information.</li> <li>• Misaligned financial incentives.</li> <li>• Undervaluing energy efficiency.</li> </ul>		the Strategy and improve the existing building stock through appropriate adaptation measures.
<b>Energy Act 2013</b>		
<p>The Act sets out new legislation to:</p> <ul style="list-style-type: none"> <li>• Reflect the availability of new technologies (such as CCS and emerging renewable technologies)</li> <li>• Correspond with our changing requirements for security of supply infrastructure (such as offshore gas storage)</li> <li>• Ensure adequate protection for the environment and the tax payer as our energy market changes.</li> </ul>	<p>There are no specific targets or indicators of relevance.</p>	<p>The SA Framework should include an objective relating to minimising greenhouse gas emissions.</p> <p>The plan should ensure that policies are in place to encourage the reduction in CO2 emissions whilst promoting sustainable economic growth.</p>
<b>UK Fuel Poverty Strategy (Department for Business, Enterprise and Regulatory Reform, 2001)</b>		
<p>The strategy identifies the main causes of fuel poverty in the UK (a combination of poor energy efficiency in homes and low incomes) and outlines its effects on quality of life and health. The strategy aims to reduce fuel poverty especially of vulnerable members of society, such as children and the elderly.</p>	<p>There are no specific objectives, targets or indicators of relevance.</p>	<p>The SA Framework should include an objective to reduce fuel poverty.</p> <p>The Local Plan should include policies designed to reduce fuel requirements in new buildings and therefore reduce fuel poverty.</p>
<b>TRANSPORT</b>		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<b>Transport White Paper – Cutting Carbon, creating growth: Making sustainable local transport happen (DfT 2011)</b>		
<p>The vision is for a transport system that is an engine for economic growth but one that is greener and safer and improves the quality of life in our communities.</p> <p>This White Paper forms part of the dft's overall strategy to tackle carbon emissions from transport. It sets out what Government believes is the best way in the short term to reduce emissions at the local level, using the tools that are available to us now, principally by encouraging people to make more sustainable travel choices for shorter journeys. This White Paper is about providing the early reduction in carbon emissions that local action is best placed to deliver, while facilitating the access to local jobs that will boost economic growth.</p>	<p>The document does not contain specific targets or indicators.</p>	<p>The SA Framework should ensure inclusion of objectives that promote sustainable transport.</p> <p>The Local Plan should recognise the importance of safe, reliable and efficient transport systems to economic and social wellbeing. The sustainability impacts of transport should also be fully understood.</p>
<b>The Future of Transport White Paper – A Network for 2030 (DfT, 2004)</b>		
<p>This White Paper builds upon the 10-year Transport Plan and looks at the factors that will shape travel and transport networks over the next 30 years. It sets out how the Government proposes to respond to pressures balanced against safeguarding economic and social well-being and the environment. It highlights that it is essential that planning and transport policies are closely co-ordinated to produce more sustainable patterns of development and travel.</p>	<ul style="list-style-type: none"> <li>• Ensure we can benefit from mobility and access while minimising the impact on other people and the environment, now and in the future.</li> <li>• Get the best out of our transport system without damaging our overall quality of life.</li> <li>• Develop strategies that recognise that demand for travel will increase in the future.</li> <li>• Work towards a transport network that can meet the challenges of a growing economy and the</li> </ul>	<p>Include SA objectives to reduce the need to travel and improve choice and use of sustainable transport modes.</p> <p>The Local Plan should provide for an increase in demand for travel whilst minimising impact on the environment. Policies also needed to promote public transport use rather than increasing reliance on the car.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>increasing demand for travel but can also achieve the government's environmental objectives.</p> <ul style="list-style-type: none"> <li>Provides targets for emission reductions, now superseded by later agreements. Transport is currently responsible for about a quarter of total emissions.</li> </ul>	
<b>Door to Door: A Strategy for Improving Sustainable Transport Integration (DfT, 2013)</b>		
<p>The strategy focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport:</p> <ul style="list-style-type: none"> <li>Accurate, accessible and reliable information about different transport options</li> <li>Convenient and affordable tickets</li> <li>Regular and straightforward connections at all stages of the journey and between different modes of transport</li> <li>Safe and comfortable transport facilities</li> </ul> <p>The strategy also includes details on how the Government is using behaviour change methods to reduce or remove barriers to the use of sustainable transport, and working closely with stakeholders to deliver a better-connected transport system.</p>	<p>The document does not contain specific targets or indicators.</p>	<p>Include SA objectives relating to high quality, efficient sustainable transport systems.</p> <p>The Local Plan should take into account their role in addressing the four core areas outlined in the Strategy.</p>
<b>CONSERVATION AND BIODIVERSITY</b>		
<b>Wildlife and Countryside Act (1981) (as amended)</b>		
The Act still forms the basis of conservation legislation in Great Britain, although	The document does not contain specific	The SA Framework should include

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
it has been much modified.  Schedules 5 and 8 of the Act detail lists of legally protected wild animals and plants respectively. These are updated every five years.	targets or indicators.	objectives relating to the protection and enhancement of biodiversity resources.  The Local Plan must ensure that the requirements of the Act are complied with and that species and habitats are protected.
<b>The Conservation of Habitats and Species Regulations (2010)</b>		
These Regulations make provision for the purpose of implementing, for Great Britain, Council Directive 92/43/EEC [8] on the conservation of natural habitats and of wild fauna and flora.  They replace and update the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) in England and Wales (and to a limited degree, Scotland - as regards reserved matters).	The document does not contain specific targets or indicators.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.  It is essential that the Local Plan should consider biodiversity protection.
<b>Working with the Grain of Nature: a Biodiversity Strategy for England (March 2011)</b>		
The overarching vision of this Strategy is for a country where wild species and habitats are part of healthy functioning ecosystems; where we nurture, treasure and enhance our biodiversity, and where biodiversity is a natural consideration of policies and decisions, and in society as a whole.	The Strategy's specific vision for towns and cities is to have towns and cities which have a place for wildlife, and in which a flourishing biodiversity makes a real contribution to the quality of life of	SA objectives should incorporate the key aims of the strategy.  The Local Plan should help promote the vision of the strategy for towns

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>urban residents, workers and visitors. Development that makes minimal impact on wildlife habitats and contributes to the conservation of biodiversity. Five key aims for protecting biodiversity in towns and cities are also set out in the Strategy as follows:</p> <ul style="list-style-type: none"> <li>• To ensure that cities, towns and other settlements contribute fully to the goals of biodiversity conservation</li> <li>• To ensure that construction, planning, development and regeneration have minimal adverse impacts on biodiversity and enhance where possible</li> <li>• To ensure that biodiversity conservation is integral to sustainable urban communities, both in the built environment, and in parks and green spaces</li> <li>• To ensure that biodiversity conservation is integral to measures to improve the quality of people's lives, delivered through other initiatives e.g. Community Strategies, including Neighbourhood Renewal and Cultural</li> <li>• Strategies, social inclusion, health and equality of opportunity</li> <li>• To value, further and enhance people's own contributions to</li> </ul>	<p>and cities and ensure that it does not impede the achievement of the five key aims for towns and cities.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
	improving biodiversity in towns and cities and to increase their access to it	
<b>Natural Environment White Paper (2011)</b>		
These indicators show changes in aspects of biodiversity such as the population size of important species or the area of land managed for wildlife. They provide part of the evidence to assess whether the targets set out in the following column have been achieved.	<p>There are eighteen UK biodiversity indicators grouped under six focal areas aligned to those used by the Convention on Biological Diversity:</p> <ol style="list-style-type: none"> <li>1. Status and trends in components of biodiversity</li> <li>2. Sustainable use</li> <li>3. Threats to biodiversity</li> <li>4. Ecosystem integrity and ecosystem goods and services</li> <li>5. Status of resource transfers and use</li> <li>6. Public awareness and participation</li> </ol>	<p>include an SA objective relating to the enhancement of the natural environment and consider the multiple benefits that the natural environment can provide (e.g. health benefits).</p> <p>The Local Plan should protect the intrinsic value of nature and recognise the multiple benefits it could have for communities.</p>
<b>Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)</b>		
The aim of the Strategy is to guide conservation efforts in England up to 2020. Moving further on from 2020, the ambition is to move from a net biodiversity loss to gain.	<p>The strategy includes 22 priorities which include actions for the following sectors:</p> <ul style="list-style-type: none"> <li>• Agriculture</li> <li>• Forestry</li> <li>• Planning and Development</li> <li>• Water Management</li> <li>• Marine Management</li> <li>• Fisheries</li> </ul>	<p>Include SA objective relating to the protection and enhancement of the natural environment.</p> <p>The Local Plan should take into account their role in seeking to prevent the degradation of biodiversity and ecosystem services</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> <li>• Air Pollution</li> <li>• Invasive Non-Native Species</li> </ul>	within LBTH. DPDs should also recognise their contribution to securing a net gain in biodiversity.
<b>Safeguarding our Soils: A Strategy for England (DEFRA, 2009)</b>		
<p>The vision is "by 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard</p> <p>The vision is "by 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard.</p>	<p>The Strategy highlights the areas for priority including:</p> <ul style="list-style-type: none"> <li>• Better protection for agricultural soils.</li> <li>• Protecting and enhancing stores of soil carbon.</li> <li>• Building the resilience of soils to a changing climate.</li> <li>• Preventing soil pollution.</li> <li>• Effective soil protection during construction and development.</li> <li>• Dealing with our legacy of contaminated land.</li> </ul>	<p>Include SA objective which seeks to safeguard and enhance the quality of soil, specifically in the context of the Local Plan this relates to the need to remediate previously contaminated land</p> <p>The Local Plan should help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations.</p>
<b>GREENSPACE</b>		
<b>Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)</b>		
<p>These publications by Natural England explain and give guidance on the concept of Accessible Natural Green Space Standards (ANGSt). The 2010 report provides practical advice to planning authorities on meeting the standards within new and existing developments.</p>	<p>ANGSt recommends that everyone, wherever they live, should have an accessible natural greenspace:</p> <ul style="list-style-type: none"> <li>• of at least 2ha in size, no more than</li> </ul>	<p>The SA Framework should contain an objective relating to the provision of green space.</p> <p>The Local Plan should attempt to</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> <li>• 300m (5 minutes walk) from home;</li> <li>• at least one accessible 20ha site within 2km of home;</li> <li>• one accessible 100ha site within 5km of home; and</li> <li>• one accessible 500ha site within 10km of home; plus a minimum of 1ha of statutory Local Nature Reserves per thousand population.</li> </ul>	ensure that the standards are met within the borough.
<b>HERITAGE</b>		
<b>Historic Environment: A Force For the Future (2001)</b>		
<p>The UK Government Guidance sets actions to protect and sustain our heritage for future generations through measures that look in detail at Funding, Legislation, Policy Guidance, Delivery Mechanisms, Reprioritisation and Partnership Working.</p> <p>The Government vision is:</p> <ul style="list-style-type: none"> <li>• Public interest in the historic environment is matched by effective partnerships and the development of a sound base from which to develop policies.</li> <li>• Maximising the full potential of the historic environment as a learning resource.</li> <li>• Ensuring the historic environment is accessible to everybody and is seen as a something with which the whole of society can identify and engage with.</li> <li>• The historic environment is protected and sustained for the benefit of our own and future generations.</li> <li>• The historic environment is an economic asset that is well harnessed.</li> </ul>	The document does not contain specific targets or indicators.	<p>The SA should include objectives that relate to the protection and enhancement of the historic environment.</p> <p>The Local Plan will need to take on board the issues and themes that have been identified in the document.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<b>Planning (Listed Buildings and Conservation Areas) Act 1990</b>		
<p>The Planning (Listed Buildings and Conservation Areas) Act 1990 is an Act of Parliament that altered the laws on granting of planning permission for building works, notably including those of the listed building system in England and Wales.</p>	<p>The document does not contain specific targets or indicators.</p>	<p>The SA should include objectives relating to the protection and enhancement of heritage assets.</p> <p>The Local Plan must ensure that the requirements of the Act are complied with and that Listed buildings and Conservation Areas are protected.</p>
<b>Historic Environment Good Practice Advice in Planning Notes 1,2 and 3 (Historic England, 2015)</b>		
<p>The three guides are:</p> <ol style="list-style-type: none"> <li>1. The Historic Environment in Local Plans</li> <li>2. Managing Significance in decision taking on the Historic Environment</li> <li>3. The Setting of Heritage Assets</li> </ol> <p>Good practice guides in implementing the NPPF historic environment policy.</p>	<p>The document does not contain specific targets or indicators.</p>	<p>The SA should include objectives relating to the protection and enhancement of heritage assets.</p> <p>The Local Plan must ensure that the requirements of the NPPF with regards to heritage assets are applied for, in line with best practice.</p>
<b>Guidance on Tall Buildings (CABE and English Heritage 2007)</b>		
<p>In January 2007, CABE and EH produced this draft guidance to replace the existing Guidance on Tall Buildings published in 2003. The draft guidance sets out similar requirements to the adopted guidance. However, the draft places greater importance on the need for local authorities to consider appropriate locations for tall buildings in their areas and undertaking urban design studies to</p>	<p>The document does not contain specific targets or indicators.</p>	<p>SA objectives should reflect the general principles to achieve higher quality and sustainable design.</p> <p>The Local Plan should consider how</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
identify these.		to ensure the designation of areas for tall buildings are appropriate. However, it is necessary to make it clear that such proposals would still have to comply with sustainable design and amenity requirements.
<b>Urban White Paper – Our Towns and Cities: The Future (ODPM 2000)</b>		
<p>The Urban White Paper sets out a vision for the future of towns and cities. It identifies four steps to making “all urban areas places for people”:</p> <ul style="list-style-type: none"> <li>• Getting the design and quality of the urban fabric right.</li> <li>• Enabling all towns and cities to create and share prosperity.</li> <li>• Providing the quality services people need.</li> <li>• Equipping people to participate in developing their communities.</li> </ul> <p>This vision of urban living includes:</p> <ul style="list-style-type: none"> <li>• People living in attractive, well-kept towns and cities which use space and buildings well;</li> <li>• Good design and planning, which makes it practical to live in a more environmentally sustainable way, with less noise, pollution and traffic congestion;</li> <li>• Towns and cities able to create and share prosperity, investing to help all their citizens reach their full potential; and</li> <li>• Good quality services-health, education, housing, transport, finance, shopping, leisure and protection from crime that meet the needs of people and businesses wherever they are.</li> </ul>	<p>As well as targets on crime, education attainment, health and unemployment it includes targets such as:</p> <ul style="list-style-type: none"> <li>• Better, safer and more reliable transport systems, leading to the increased use of public transport and reductions in road congestion by 2010;</li> <li>• Better housing with all social housing being of a decent standard by 2010 and with most improvement taking place in deprived areas;</li> <li>• A better environment with 60% of new housing provided on previously developed land or through conversions of existing buildings by 2008; 17% of underused land reclaimed by 2010;</li> <li>• Better designed buildings and places; and clean and more attractive streets.</li> </ul>	<p>SA objectives should reflect the general principles to achieve higher quality, more accessible, safer and sustainable urban environments.</p> <p>The Local Plan should reflect the general principles to achieve higher quality, more accessible, safer and sustainable urban environments. It should also seek to contribute to the supply of new housing on previously developed land.</p>

AIR

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<b>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (DEFRA, 2007)</b>		
<p>The Strategy sets out air quality objectives and policy options to further improve air quality in the UK to deliver environmental, health and social benefits.</p> <p>It examines the costs and benefits of air quality improvement proposals, the impact of exceedences of the strategy's air quality objectives, the effect on ecosystems and the qualitative impacts.</p>	<ul style="list-style-type: none"> <li>• Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life.</li> <li>• Render polluting emissions harmless.</li> <li>• Sets air quality standards for 13 air pollutants.</li> </ul>	<p>Include SA objectives to protect and improve air quality.</p> <p>The Local Plan should take account of the likely impact on air quality from development.</p>
<b>WATER AND FLOOD</b>		
<b>Water Resources Strategy for England and Wales (2009)</b>		
<p>This is a strategy produced by the Environment Agency (EA) and applies to both England and Wales. It forms the EA's strategy for water resource management for the next 25 years.</p> <p>The focus of the strategy is understanding the present state of water resources and planning for the management of water resources to prevent long-term environmental damage and degradation. The strategy highlights where water abstractions are unsustainable and where further water is needed. The issue of climate change and its impact upon our water resources is also considered.</p> <p>30 action points are identified to deliver the strategy, which include developing leakage control, encouraging good practice when using water and promoting the value of water.</p>	<p>The document does not contain specific targets or indicators.</p>	<p>The SA Framework should include objectives that promote the protection of the water environment.</p> <p>The Local Plan needs to consider the protection and enhancement of water resources.</p>
<b>Future Water: The Government's Water Strategy for England (DEFRA, 2008)</b>		

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.	<p>The vision for 2030 is one where we, as a country have:</p> <ul style="list-style-type: none"> <li>• “improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps;</li> <li>• Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;</li> <li>• Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges;</li> <li>• Cut greenhouse gas emissions; and</li> <li>• Embed continuous adaptation to climate change and other pressures across the water industry and water users”.</li> </ul>	<p>Include objectives which seek to protect, manage and enhance the water environment.</p> <p>The Local Plan should aim to contribute to the vision set out in this Strategy.</p>
<b>Flood and Water Management Act (2010)</b>		
<p>The Act will provide better, more comprehensive management of coastal erosion and flood risk for people, homes and businesses. It also contains financial provisions related to the water industry.</p> <p>The Act will give the EA an overview of all flood and coastal erosion risk</p>	<p>The document does not contain specific targets or indicators.</p>	<p>The SA should include objectives, targets and indicators that address flooding risk and the need to manage run-off effectively.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
management and unitary and county councils lead in managing the risk of local floods. It will also enable better management of water resources and quality, and will help to manage and respond to severe weather events such as flood and drought.		The Local Plan should consider flood risk issues. It should seek to avoid siting new development in floodplain and ensure the sustainable use of water resources.
<b>The National Flood and Coastal Erosion Risk Management Strategy for England (Environment Agency, 2011)</b>		
This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.	<p>The strategic aims and objectives of the Strategy are to:</p> <ul style="list-style-type: none"> <li>• manage the risk to people and their property;</li> <li>• Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national;</li> <li>• Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.</li> </ul>	<p>The SA framework should include objectives/indicators which seek to reduce the risk and manage flooding sustainably.</p> <p>The Local Plan should seek to reduce and manage the risk of all types of flooding.</p>
<b>Planning Policy Guidance Flood Risk and Coastal Change (March 2014)</b>		
Advises on how planning can take account of the risks associated with flooding and coastal change in plan-making and the application process.	The document does not contain specific targets or indicators.	The SA framework should include objectives/indicators which seek to reduce the risk and manage flooding

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
		sustainably.  The Local Plan should seek to reduce and manage the risk of all types of flooding, using best practice guidance.
<b>Thames Region Catchment Flood Management Plan, 2009</b>		
<p>The CFMP is a high-level strategic planning tool, which should be used to agree policies for sustainable flood risk management, taking into account likely impacts of climate change and future development across the region. The document is linked closely to PPS25 and sets out the flood risk across the Thames region considering: the distribution of property at risk from fluvial flooding; and probability and historic flood events. It can be used to inform the SFRA. The main messages it sets out for the regions are:</p> <ul style="list-style-type: none"> <li>• Flood defences cannot be built to protect everything</li> <li>• Climate change will be the major cause of increased flood risk in the future</li> <li>• The flood plain is our most important asset in managing flood</li> <li>• Development and urban regeneration provide a crucial opportunity to manage the risk.</li> </ul> <p>The document states specifically that a major part of this will be through planning and development and that the location, layout and design of development can all reduce flood risk.</p>	<p>The document does not contain specific targets or indicators.</p>	<p>The SA framework should include objectives/indicators which seek to reduce the risk and manage flooding sustainably.</p> <p>The Local Plan should seek to reduce and manage the risk of all types of flooding, using best practice guidance. It will be important that the Local Plan serve to help minimise flood risk in the region, particularly given that the CFMP refers to the location, layout and design of development, which can be controlled through the Local Plan, being significant in reducing flood risk.</p>
<b>WASTE</b>		
<b>Waste Strategy for England (DEFRA, 2007)</b>		

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>This plan supersedes the 2007 National Waste Management Strategy. The principal commitment of the Plan is to work towards a longer term vision of a zero waste economy in which material resources are reused, recycled or recovered wherever possible and only disposed of as the option of last resort.</p>	<p>Future of waste management – the government commitment.</p> <ul style="list-style-type: none"> <li>• Tackle the amount of waste produced, by breaking the link between economic growth and waste production.</li> <li>• Put waste which is produced to good use through substantial increases in re-use, recycling, composting, and recovery of energy.</li> </ul>	<p>SA objectives should seek to ensure waste is minimised and promote recycling and reuse.</p> <p>The Local Plan should encourage the minimisation of waste production and the maximisation of recycling and re-use of materials.</p>
<b>National Planning Policy for Waste 2014</b>		
<p>The NPPW sets out the Government's streamlined policy framework for waste, replacing PPS10.</p>	<p>It emphasise:</p> <ul style="list-style-type: none"> <li>• Positive planning to deliver sustainable development and resource efficiency;</li> <li>• Consideration of waste management needs alongside other key spatial planning concerns such as transport and housing;</li> <li>• Providing a framework for stakeholder engagement;</li> <li>• Enabling waste to be disposed and recovered in line with the Proximity Principle;</li> <li>• Moving management up the Waste Hierarchy without endangering the environment or human health</li> <li>• Ensuring design of all developments contributes to the</li> </ul>	<p>SA objectives should reflect principles in sustainable waste management.</p> <p>Where appropriate the Local Plan should meet the key objectives of national policy.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	objectives of sustainable waste management and improved resource efficiency.	
<b>COMMUNITIES</b>		
<b>The Egan Review – Skills for Sustainable Communities (2004)</b>		
<p>"Sustainable communities meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice. They achieve this in ways that make effective use of natural resources, enhance the environment, promote social cohesion and inclusion and strengthen economic prosperity."</p> <p>The key components of sustainable communities are:</p> <ul style="list-style-type: none"> <li>• Governance – effective and inclusive participation, representation and leadership.</li> <li>• Transport and connectivity – Good transport services and communications linking people to jobs, schools, health and other services.</li> <li>• Services – a full range of appropriate, accessible public, private community and voluntary services.</li> <li>• Environmental – providing places for people to live in an environmentally friendly way.</li> <li>• Economy – A flourishing and diverse local economy.</li> <li>• Housing and the Built Environment – a quality built and natural environment</li> <li>• Social and cultural – vibrant, harmonious and inclusive communities</li> </ul>	<p>A series of indicators are defined for each of the key components to monitor progress. These include:</p> <ul style="list-style-type: none"> <li>• % of population who live in wards that rank within the most deprived 10% and 25% of wards in the country.</li> <li>• % of residents surveyed and satisfied with their neighbourhoods as a place to live.</li> <li>• % of respondents surveyed who feel they 'belong' to the neighbourhood (or community).</li> <li>• Domestic burglaries per 1000 households and % detected.</li> <li>• % of adults surveyed who feel they can influence decisions affecting their local area.</li> <li>• Household energy use (gas and electricity) per household.</li> <li>• % people satisfied with waste recycling facilities.</li> </ul>	<p>There are a number of objectives and indicators in the document that should be integrated into the SA Framework.</p> <p>The plan should include policies that support the principles of the Egan Review and seek to develop sustainable communities.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> <li>• Average no. of days where air pollution is moderate or higher for NO<sub>2</sub>, SO<sub>2</sub>, O<sub>3</sub>, CO or PM<sub>10</sub>.</li> <li>• % of listed building of Grade I and II* at risk of decay.</li> <li>• % of residents surveyed finding it easy to access key local services.</li> <li>• % of people of working age in employment (with BME breakdown).</li> <li>• Average life expectancy.</li> <li>• No. of primary care professionals per 100,000 population.</li> </ul>	
<b>HEALTH</b>		
<p><b>Working for a Healthier Tomorrow – Dame Carol Black's Review of the health of Britain's working age population (2008)</b></p>		
<p>This Review sets out the first ever baseline for the health of Britain's working age population, seeking to lay the foundations for urgent and comprehensive reform through a new vision for health and work in Britain. Three principles lie at the heart of this vision:</p> <ul style="list-style-type: none"> <li>• Prevention of illness and promotion of health and well-being</li> <li>• Early intervention for those who develop a health condition</li> <li>• An improvement in the health of those out of work so that everyone with the potential to work has the support they need to do so</li> </ul> <p>The Review recognises the human, social and economic costs of impaired health and well-being in relation to working life in Britain. The aim of the Review is not to offer a utopian solution for improved health in working life, but more to identify the factors that stand in the way of good health and to elicit interventions (including services, changes in attitudes, behaviours and practices) that can help to overcome them.</p>	<p>Although there are no relevant targets within the Review, it presents a number of indicators of working age, health which include:</p> <ul style="list-style-type: none"> <li>• Life expectancy</li> <li>• Mortality during working age</li> <li>• % of the working age population being in good, fairly good or poor health</li> <li>• Proportion of people out of work due to sickness or disability</li> <li>• Sickness absence per annum</li> <li>• Sickness notes issued per medical</li> </ul>	<p>The SA should include objectives that seek to protect human health and reduce health inequalities.</p> <p>The Local Plan should consider issues relating to human health.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>Monitoring the baseline presented in this Review will be critical, together with a research programme to inform future action with a comprehensive evidence base and increased cross-government effort to ensure progress.</p>	<ul style="list-style-type: none"> <li>• condition</li> <li>• % of working time lost due to sickness</li> <li>• Proportion of the working age population on incapacity benefits</li> <li>• Employment rate</li> <li>• Employment rate for disabled people</li> <li>• Income rates</li> <li>• Economic inactivity and reasons for inactivity, split into those inactive who would like to work and those seeking work</li> <li>• Proportion of deviation from perfect health by social class (Quality Adjusted Life Year (QALY) health measure and work status.</li> <li>• Proportion of adult population who smoke</li> <li>• Work related illness by industry</li> <li>• Proportion of working age population with mental health conditions</li> <li>• Incapacity benefits claimants by primary medical condition</li> <li>• Costs of working age ill health</li> </ul>	

**Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002**

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>The 2001/2 Report and its update seek to provide quantitative estimates of the possible impacts of climate change on health. It is recognised that there could be significant long-term health effects as a result of climate change.</p> <p>Since the original report, the assessment of future climate change has been updated. A new generation of high-resolutions climate models has allowed for improved estimates future changes in the frequency, intensity and duration of extreme events in the UK. Some of the major areas of concern are:</p> <ul style="list-style-type: none"> <li>• Flooding</li> <li>• Vector-borne diseases</li> <li>• Food-borne diseases</li> <li>• The effects of climate change on drinking water supplies</li> <li>• The direct effects of high temperatures</li> <li>• The air pollution climate</li> <li>• Exposure to ultra-violet light</li> </ul>	<p>A number of indicators are presented in this Report.</p> <p>They key ones include:</p> <ul style="list-style-type: none"> <li>• Mean annual temperature</li> <li>• Number of days per year with daily mean exceeding 20oC</li> <li>• Number of days per year with daily mean below 0oC</li> <li>• Annual total rainfall</li> <li>• Seasonal rainfall</li> <li>• Maximum daily wind speed</li> <li>• Annual highest maximum daily wind speed</li> <li>• Annual cases of malaria</li> </ul>	<p>The SA Framework should include objectives that address climate change issues including flooding and the need to reduce greenhouse gas emissions. It should also include an objective related to human health.</p> <p>The Local Plan should address the issues relating to climate change, and the need to encourage provision of high quality and flexible health services.</p>
<p><b>Fair Society, Healthy Lives, The Marmot Review (2010)</b></p> <p>Focuses on interventions that reduce both health inequalities and mitigate climate change, by: active travel; good quality open and green spaces; Improving the food environment in local; energy efficiency of housing; integrate the planning, transport, housing, environmental and health systems to address the social determinants of health; reduce social isolation.</p> <p>The six main recommendations of the review are:</p> <ul style="list-style-type: none"> <li>• Giving every child the best start in life</li> <li>• Enabling all children, young people and adults to maximize their capabilities and have control over their lives</li> <li>• Creating fair employment and good work for all</li> </ul>	<p>This document does not contain specific targets or indicators</p>	<p>Include an SA Objective to address health inequalities.</p> <p>The Local Plan should help promote the aims set out in this report.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>Ensuring a healthy standard of living for all</li> <li>Creating and developing sustainable places and communities</li> <li>Strengthening the role and impact of ill-health prevention</li> </ul>		

Urban White Paper 2000, Our Towns and Cities: The Future – delivering an urban renaissance (ODPM, 2000)

## Regional and Sub-Regional Level Plans

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>PLANNING</b>		
<b>London Plan: Spatial Development Strategy For Greater London (Consolidated with alterations since 2011) (2015)</b>		
<p>The London Plan provides a framework for land-use management, development and regeneration in London.</p> <p>The Strategy aims to further the following objectives:</p> <ul style="list-style-type: none"> <li>A city that meets the challenges of economic and population growth.</li> <li>An internationally competitive and successful city.</li> <li>A city of diverse, strong, secure and accessible neighbourhoods.</li> <li>A city that delights the senses.</li> <li>A city that becomes a world leader in improving the environment.</li> </ul>	<p>The Plan sets a range of targets and aims, which is reviewed and revised periodically. These include:</p> <p>The current London Plan proposes an annual minimum housing target of 3,931 for Tower</p>	<p>The SA framework must take account of the policies set out within the London Plan.</p> <p>The Local Plan must be in accordance with the policies set out within the London Plan. Careful consideration will have to be given about how to balance the London Plan requirements with local needs and</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.</li> </ul>	<p>Hamlets.</p> <p>The plan also sets a waste apportionment target which states what percentage of London's waste each borough is responsible for managing. In Tower Hamlets this is 3.8%.</p> <p>The Mayor proposes that as a long term strategic target 60 per cent of new affordable housing should be for social renting, especially for families, and that 40 per cent should be for the range of intermediate housing products outlined in the London Housing Strategy. Boroughs must prioritise maximising the number of affordable homes, and must avoid setting rental caps which may limit the numbers built.</p>	aspirations, especially around housing quantity and affordability.
<b>Accessible London: Achieving an inclusive environment (GLA, 2014)</b>		
This Supplementary Planning Guidance (SPG) provides detailed advice and guidance on the policies which promote an inclusive environment in London. The SPG:	There are no specific targets or indicators in this document	SA objectives should take the Accessibility Strategy into account.

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>Provides guidance on the policies contained in the London Plan regarding the promotion of an inclusive and accessible environment</li> <li>Gives local planning authorities advice on how to implement these policies</li> <li>Explains the principles of inclusive design and how these principles should be applied in London</li> <li>Gives designers ideas on where to find good technical advice and guidance.</li> <li>Provides disabled people, older people and others who experience barriers in the built environment with an understanding of what to expect from planning in London.</li> <li>Identifies legislation and national planning policy guidance relevant to the promotion of an inclusive environment.</li> <li>Provides signposts to other relevant London Plan SPG documents and Implementation Guides which impact on the delivery of an inclusive environment.</li> </ul>		The advice given in the Mayor's SPG should be followed in developing policies and accessibility should form a strong Local Plan policy.
<b>The Mayor's Sustainable Design and Construction: SPG 2014</b>		
To support the policies in the London Plan this SPG includes guidance on: <ul style="list-style-type: none"> <li>Energy efficient design</li> <li>Meeting the carbon dioxide reduction targets</li> <li>Decentralised energy</li> <li>How to off-set carbon dioxide where the targets set out in the London Plan are not met</li> <li>Retro-fitting measures</li> <li>Support for monitoring energy use during occupation</li> <li>An introduction to resilience and demand side response</li> <li>Air quality neutral</li> <li>Resilience to flooding</li> <li>Urban greening</li> <li>Pollution control</li> </ul>	There are no specific targets or indicators in this document	SA objectives should seek to promote sustainable design and construction.  Sustainable design and construction principles should be taken forward in the Local Plan.

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>• Basements policy and developments</li> <li>• Local food growing</li> <li>.</li> </ul>		
<b>Shaping neighbourhoods: character and context (GLA, 2014)</b>		
The objectives of this SPG are to provide: <ul style="list-style-type: none"> <li>• specific guidance on the attributes of character and context in London (physical, cultural, social, economic, perceptions and experience);</li> <li>• information on resources that inform an understanding of character and context in London;</li> <li>• an analysis of the interrelationships between different aspects of character, and how it can be articulated and presented to others;</li> <li>• examples of good practice in how an understanding of character and context can be used to help manage change in a way that sustains and enhances the positive attributes of a place.</li> </ul>	There are no specific targets or indicators in this document	<p>SA should include a framework to ensure that the character and context are protected and enhanced.</p> <p>The Local Plan should seek to protect character and context.</p>
<b>Planning and Equality and Diversity in London (GLA, 2007)</b>		
This SPG: <ul style="list-style-type: none"> <li>• provides guidance to boroughs, partners and developers on the implementation of policies in the London Plan which relate to equalities issues and addressing the needs of London's diverse communities;</li> <li>• sets out some of the tools for promoting equality and diversity in planning processes;</li> <li>• highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination in the planning context;</li> <li>• sets out overarching principles and the key spatial issues for planning for equality; and</li> </ul>	There are no specific targets or indicators in this document	<p>SA objectives should reflect the equality and diversity issues contained within the SPG.</p> <p>Local Plan should include policies which relate to the specific equality and diversity needs and contexts of the borough.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
• examines in greater detail the spatial needs of London's diverse communities and identifies how spatial planning can be used to try and address these.		
<b>London View Management Framework SPG (GLA, 2012)</b>		
The London View Management Framework SPG provides guidance on the policies in the London Plan for the protection of strategically important views in London. The SPG explains how the views designated by the Mayor and listed in the London Plan are to be managed, and replaces the previous 2007 SPG	There are no specific targets or indicators in this document	<p>SA objectives should reflect the importance of protecting the setting of important buildings.</p> <p>Local plan policies should reflect the established strategically important view corridors which cross or impact on the borough.</p>
<b>HOUSING</b>		
<b>London Housing Strategy (GLA, 2014)</b>		
The Strategy seeks to increase the supply of well-designed housing of all tenures and to ensure that these homes better support London's continued economic success.	<p>The Strategy contains a number of policies which range from improving existing stock to tackling rough sleeping; however, improving housing supply to 42,000 homes per annum (17,000 of these should be affordable) is at the core.</p> <p>The five key priorities of the Strategy are:</p> <ul style="list-style-type: none"> <li>• Increasing housing supply to</li> </ul>	<p>The SA Framework must consider the provision of and access to housing for all community groups.</p> <p>The Local Plan should take account of the priorities set out within the strategy, having specific regard to the proposed housing supply target.</p> <p>The Local Plan must ensure that land use and transport links are available to ensure</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<p>levels not seen since the 1930s</p> <ul style="list-style-type: none"> <li>• Better supporting working Londoners and helping more of them into home ownership</li> <li>• Improving the private rented sector and promoting new purpose-built and well managed private rented housing</li> <li>• Pushing for a new, long-term financial settlement for London Government to drive housing delivery</li> <li>• Bring forward land for development and accelerating the pace of housing delivery through Housing Zones and the London Housing Bank.</li> </ul>	that Strategy's targets can be met.
<b>Draft Interim Housing Supplementary Planning Guidance (GLA, 2015)</b>		
<p>This draft Interim Supplementary Planning Guidance (SPG) provides guidance on the implementation of housing policies in the 2015 London Plan.</p> <p>Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:</p>	<p>Maintains the targets established in the London Plan.</p>	<p>The SA Framework must consider the provision of and access to housing for all community groups.</p> <p>The Local Plan should take account of the guidance, having specific regard to the proposed housing supply target.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>• intensification</li> <li>• town centre renewal, especially centres with good public transport accessibility</li> <li>• opportunity and intensification areas and growth corridors</li> <li>• mixed use redevelopment, especially of surplus commercial capacity and surplus public land, and particularly that with good transport accessibility</li> <li>• sensitive renewal of existing residential areas, especially in areas of good public transport accessibility</li> </ul> <p>Boroughs must identify new, and review existing housing sites for inclusion in LDFs</p>		The Local Plan must ensure that land use and transport links are available to ensure that Strategy's targets can be met.
<b>AIR</b>		
<b>The Mayor's Air Quality Strategy – Clearing the Air (GLA, 2010)</b>		
<p>The Strategy sets out the Mayor's vision for air quality in London. This seeks to protect the health of Londoners and enhance their quality of life by improving the quality of air within London.</p>	<p>This will:</p> <ul style="list-style-type: none"> <li>• Make London a more pleasant place to live and work in;</li> <li>• Reduce the burden on health services in the capital;</li> <li>• Enhance London's reputation as a green city – making it more attractive to tourists and businesses; and</li> <li>• Make London cleaner whilst safeguarding its biodiversity.</li> </ul>	<p>Include SA objectives to maintain and enhance air quality.</p> <p>The Local Plan should take account of the Strategy and the vision and objectives within it.</p> <p>LBTH is an AQMA therefore the local plan should seek to reduce the need for travel and promote sustainable travel either through public transport or greater interlinkages with footpaths and cycle ways.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>TRANSPORT</b>		
<p><b>The Mayor's Transport Strategy (GLA, 2010)</b></p> <p>The document sets out the Mayor's transport strategy for London for the period up to 2031.</p>	<p>The Strategy has six objectives which are:</p> <ul style="list-style-type: none"> <li>• To support economic development and population growth;</li> <li>• Enhance the quality of life for all Londoners;</li> <li>• Improve the safety and security of all Londoners;</li> <li>• Improve transport opportunities for all Londoners;</li> <li>• Reduce transport's contribution to climate change, and improve its resilience; and</li> <li>• Support delivery of the London 2012 Olympic and Paralympic Games and its legacy</li> </ul> <p>Each objective has a number of sub-challenges and sub-outcomes which should be tackled and secured respectively.</p>	<p>Include SA objectives to cover the objectives of the Transport Strategy.</p> <p>The Local Plan should seek to tackle the challenges and secure the outcomes set out within the Strategy.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<p>The Mayor has a target to reduce London's CO2 emissions by 60 per cent by 2025, compared to 1990 levels.</p> <p>The Mayor has a legal obligation to meet national and European targets for reducing concentrations of particulates (PM) and oxides of nitrogen (NOx).</p>	
<b>The Mayor's Vision for Cycling in London (GLA, 2013)</b>		
The document sets out the Mayor's strategy for cycling within London.	<p>The Vision is underpinned by four key outcomes:</p> <ul style="list-style-type: none"> <li>• A tube network for the bike;</li> <li>• Safer streets for the bike;</li> <li>• More people travelling by bike; and</li> <li>• Better places for everyone</li> </ul>	<p>Include SA objective which seeks to promote cycling as a primary mode of transport.</p> <p>The Local Plan, where appropriate, should take account of the key outcomes set out within the Vision.</p>
<b>Taking forward the Mayor's Transport Strategy Accessibility Implementation Plan: 2012</b>		
Defines TfL's vision and priorities for the future of accessibility improvements on London's transport system. It spans the period beyond the committed programme of investment, within the 2031 time horizon considered by the Mayor's Transport Strategy (MTS). The report provides	Contains details and expected dates for projects.	Take into account strategy and project timelines within the Local Plan.

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
greater detail about the implementation and priorities contained within the MTS Accessibility Implementation Plan.		
<b>Travel in London (Report 4 – Transport for London) (2011)</b>		
<p>London's hosting of the 2012 Olympic and Paralympic Games provided a major opportunity to enhance London's physical transport infrastructure, to promote positive changes to the ways in which people travel, and to contribute to the lasting wider regeneration of East and Southeast London. This physical transport legacy represents a step-change to levels of accessibility to, from and within East and Southeast London. Over the longer term this will facilitate the wider economic and social development and convergence sought by the Legacy Action Plans.</p> <p>As well as the physical transport legacy, the Action Plans identify a behavioural transport legacy.</p>	<p>The report includes the following example indicative monitoring baselines for the Games transport legacy:</p> <ul style="list-style-type: none"> <li>• Resident population, employment and deprivation.</li> <li>• Travel intensity, mode shares and household car ownership for residents.</li> <li>• Perceptions of quality of life in the Olympic boroughs.</li> <li>• Local air quality.</li> <li>• Public transport accessibility in the vicinity of the Olympic Park.</li> </ul>	<p>The SA Framework should support sustainable transport alternatives and the modal shift away from the private car.</p> <p>The Local Plan should recognise that an integrated transport network aligned with this Transport for London document is necessary to promote sustainable development.</p>
<b>CLIMATE CHANGE AND ENERGY</b>		
<b>The Mayor's Climate Change Adaptation Strategy (GLA, 2011)</b>		
Takes a risk-based approach to understanding the climate impacts today, and how these are expected to change through the 21st century. Provides a framework to identify and prioritise the key climate risks and then to identify who	There are no specific targets or indicators in this document	Include objectives which seek to promote the implementation of adaptation measures to make the Borough more

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
is best placed to deliver actions to reduce or manage these risks		<p>resilient to a changing climate.</p> <p>The Local Plan should incorporate adaptation measures which seek to improve the area's resilience to climate change.</p>
<b>The Mayor's Climate Change Mitigation and Energy Strategy (GLA, 2011)</b>		
<p>The Strategy sets out the strategic approach to limiting further climate change and securing a low carbon energy supply for London.</p> <p>Sets out the strategic approach to managing the climate risks now and in the future and increasing resilience to those risks by understanding who and what is vulnerable to extreme weather today.</p> <p>The overarching aim of the Strategy is to "assess the consequences of climate change on London and to prepare for the impacts of climate change and extreme weather to protect and enhance the quality of life of Londoners".</p>	<p>The Mayor has set four objectives for this Strategy:</p> <ul style="list-style-type: none"> <li>• To reduce London's CO2 emissions to mitigate climate change;</li> <li>• To maximise economic opportunities from the transition to a low carbon capital;</li> <li>• To ensure a secure and reliable energy supply for London; and</li> <li>• To meet, and where possible, exceed national climate change and energy objectives.</li> </ul>	<p>Include SA objectives relating to climate change mitigation and promote renewable energy.</p> <p>The Local Plan should take account of the objectives set out within the Strategy and contribute to the Mayor's CO2 emissions reduction targets for 2015, 2020, 2025 and 2050.</p>
<p><b>Green light to clean power:</b></p> <p><b>The Mayor's Energy Strategy (GLA February 2004)</b></p>		
The Strategy sets out the Mayor's proposals for change in the way energy is	Targets include:	SA Objectives should reflect the Mayors

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>supplied and used within London over the next ten years and beyond, against a long-term vision of a sustainable energy system in London by 2050.</p> <p>The strategy also sets out how objectives will be met through implementation of the London Plan policies.</p>	<ul style="list-style-type: none"> <li>• CO2 emission reductions of 60% from 2000 levels by 2050,</li> <li>• one zero-carbon scheme in each Borough by 2010,</li> <li>• London to generate 665GWh of electricity and 280GWh of heat, from up to 40,000 renewable energy schemes by 2010.</li> </ul>	<p>Energy Strategy and objectives to reduce emissions and use less energy and more renewable energy.</p> <p>The Local Plan should work towards achieving these carbon reduction targets and incorporate these into policies</p>
<b>BIODIVERSITY</b>		
<b>The Mayor's Biodiversity Strategy (GLA, 2002)</b>		
<p>The Strategy sets out 14 policies and 72 proposals which seek to protect and care for London's biodiversity.</p>	<p>Key aims include:</p> <ul style="list-style-type: none"> <li>• Establishing principles for the use and management of the water and land beside the River Thames;</li> <li>• Encourage the management, enhancement and creation of green space for biodiversity, and promote public access and appreciation of nature;</li> <li>• Promote the conservation and enhancement of farmland biodiversity;</li> </ul>	<p>Include SA objectives which seek to protect and enhance the natural environment.</p> <p>The SA Framework needs to include objectives, indicators and targets that address the need to maintain biodiversity and enhance accessibility to such areas in a sustainable manner.</p> <p>The Local Plan should conform with the 14 policies set out within the Strategy and adhere to the aims of the Strategy.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> <li>• Encourage greening of the built environment and the use of open space in ecologically sensitive ways; and</li> <li>• Encourage business to play a major role in the programme for conserving London's biodiversity.</li> </ul> <p>The success of the Mayor's Strategy is measured against two main targets: firstly, that there is no overall loss of wildlife habitats in London; and secondly, that more open spaces are created and made accessible, so that all Londoners are within walking distance of a quality natural space.</p>	Local Plan should ensure that there is no overall loss in bio diverse land, any loss must be compensated for by land which is of equal or higher biological diversity.
<b>London Biodiversity Action Plan (various)</b>		
<p>The London Biodiversity Partnership delivers the London Biodiversity Action Plan for important habitats and species within the Greater London area.</p> <p>Action Plans have been prepared for the following:</p> <ol style="list-style-type: none"> <li>1. acid grassland</li> <li>2. chalk grassland</li> <li>3. heathland</li> </ol>	<p>The London BAP contains targets to enhance and to increase the extent of priority habitats found in the capital by 2015 and by 2020. These targets have been incorporated into the London Plan.</p>	<p>The SA Framework needs to include objectives, indicators and targets that address the need to maintain biodiversity and enhance accessibility to such areas in a sustainable manner.</p> <p>The Local Plan should ensure that there is</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>4. parks &amp; urban greenspaces        5. private gardens        6. reedbeds        7. rivers &amp; streams        8. standing water        9. tidal Thames        10. wasteland        11. woodland        12. bats        13. black poplar        14. house sparrow        15. mistletoe        16. reptiles        17. sand martin        18. stag beetle        19. water vole</p>		<p>no overall loss in biodiversity resources, any loss must be compensated for by land which is of equal or higher biological diversity.</p>
<b>ECONOMY</b>		
<b>The Mayor's Economic Development Strategy (GLA, 2010)</b>		
<p>The Strategy sets out the vision with respect to the London economy, and how it can be realised, and be compatible with this Strategy.</p>	<p>It includes five economic objectives:</p> <ul style="list-style-type: none"> <li>• To promote London as the world capital of business, the world's top international visitor destination, and the world's leading international centre of learning and creativity;</li> </ul>	<p>Include a SA objective which seeks to promote employment and the economy of the area.</p> <p>The Local Plan should take into account the Mayor's vision for the London economy and the objectives which underpin it.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<ul style="list-style-type: none"> <li>• To ensure that London has the most competitive business environment in the world;</li> <li>• To make London one of the world's leading low carbon capitals by 2025 and a global leader in carbon finance;</li> <li>• To give all Londoners the opportunity to take part in London's economic success, access sustainable employment and progress in their careers; and</li> <li>• To attract the investment in infrastructure and regeneration which London needs, to maximise the benefits from this investment and in particular from the opportunity created by the 2012 Olympic and Paralympic Games and their legacy.</li> </ul> <p>The strategy contains no specific economic targets or indicators but refers to targets in the London Plan and other supporting documents.</p>	

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>Draft Central Activity Zone Supplementary Planning Guidance (2015)</b>		
<p>This draft Supplementary Planning Guidance (SPG) provides guidance on the implementation of policies in the 2015 London Plan related to London's Central Activities Zone and the North of the Isle of Dogs.</p> <p>It provides guidance on:</p> <ul style="list-style-type: none"> <li>• promoting the CAZ as a competitive business location</li> <li>• promoting strategic clusters of culture, arts and entertainment uses/activities,</li> <li>• enhancing the distinct environment and heritage of the CAZ.</li> <li>• identifying capacity for residential development in the CAZ without compromising strategic functions</li> <li>• guidance on transport, movement and infrastructure including the implementation of essential new transport infrastructure schemes</li> </ul>	<p>There are no specific targets and indicators in this document.</p>	<p>Ensure SA Objectives reflect the range of objectives for the CAZ.</p> <p>The Local Plan will have to take into account the policies and guidance relating to the CAZ, as two key areas are in the borough: Broadgate and North of the Isle of Dogs.</p>
<b>Town centres SPG (GLA, 2014)</b>		
<p>The SPG includes guidance to:</p> <ul style="list-style-type: none"> <li>• promote the vitality and viability of London's town centres, including neighbourhood and local centres;</li> <li>• support a vibrant mix of uses in town centres including retailing, leisure, culture, tourism, business, social infrastructure and housing;</li> <li>• accommodate growth in demand for new town centre floorspace within centres or in well integrated edge of centre sites;</li> <li>• bring back into use vacant or under-used properties;</li> <li>• promote inclusive access by public transport, shop mobility, walking and cycling to the range of goods and services in town centres sustainable</li> </ul>	<p>There are no specific targets and indicators in this document.</p>	<p>The SA objectives should reflect the Mayors guidance on Town centres.</p> <p>The Local Plan should consider draft guidance on Town centres in connection with the London Plan</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>neighbourhoods with quality design and public realm, now and for the future;</p> <ul style="list-style-type: none"> <li>• develop the sense of place and identity of town centres, making them places that people will want to visit;</li> <li>• implement the Strategic Outer London Development Centre concept to enhance the distinct economic strengths of these locations whilst complementing growth in other centres.</li> </ul>		
<b>London Office Policy Review (GLA 2012)</b>		
<p>Assesses supply and demand issues in relation to office development and future prospects for future growth in a range of parts of London. Considers impact of the economic downturn on commercial property.</p> <p>Key points of note include:</p> <ul style="list-style-type: none"> <li>• There will be demand for new office space and for new types of formats of office space and related employment space</li> <li>• The rate of growth in office jobs 2011-36 is forecast to be half that prevailed over the last two decades</li> <li>• Spatial policy should play the long game and provide a flexible framework within which Opportunity Areas and mega schemes can evolve and respond to changing market conditions.</li> <li>• London's new villages and access to rapid and reliable public transport infrastructure.</li> <li>• A key strategic challenge for spatial policy will be to create the flexibility to respond to changes in the office market, while creating the certainty to attract investors</li> </ul>	<p>There are no specific targets and indicators in this document.</p>	<p>SA objectives should consider these findings.</p> <p>The Local Plan should consider these findings and implications in identifying priority uses in conjunction with local policies.</p>
<b>SOCIAL INFRASTRUCTURE</b>		
<b>Social Infrastructure Supplementary Planning Guidance (GLA, 2015)</b>		

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>This SPG provides guidance to anyone engaged in development or plan-making to understand the quantity and types of social infrastructure needed to support growth.</p> <p>The document provides guidance on:</p> <ul style="list-style-type: none"> <li>• Planning for social infrastructure provision;</li> <li>• Health and social care considerations;</li> <li>• Education requirements;</li> <li>• Sports facilities; and</li> <li>• Faith requirements.</li> </ul>	<p>There are no specific targets and indicators in this document.</p>	<p>Include SA objectives relating to the provision of new and retention of existing social infrastructure, to meet future need.</p> <p>The Local Plan should take account of the guidance set out within SPG.</p>
<b>Shaping neighbourhoods – play and informal recreation SPG (GLA, 2012)</b>		
<p>This document updates and replaces the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation published in 2008. It provides benchmark standards that are flexible enough to meet the varying needs of children and young people across London and should be used as a reference guide for boroughs in the development of their local standards.</p> <p>This guidance sets out responsibilities of Local Authorities, Developers and Consultants in addition to providing guidance to neighbourhood forums in shaping their neighbourhood plans. Local authorities have the responsibility of ensuring robust play strategies and establishing the overall context for implementation of the Supplementary Planning Guidance, as well as detailed roles in determining requirements for specific sites.</p>	<p>There are no specific targets and indicators in this document.</p>	<p>Include SA Objectives to protect and increase play and informal recreation.</p> <p>The Local Plan should seek to protect and increase spaces for play, especially in dense and deprived areas of the borough.</p>
<b>CULTURE</b>		
<b>The Mayor's Cultural Strategy (GLA, 2014)</b>		
The Strategy sets out the Mayor's vision for developing and promoting cultural	It sets priorities and	Include SA objectives which seek to

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>life in London.</p> <p>Sets out the following priorities for culture:</p> <ul style="list-style-type: none"> <li>• Maintaining London's position as a world city for culture</li> <li>• Widening the reach to excellence - improve access and participation in high quality arts and cultural activities</li> <li>• Education, skills and careers - Increasing access to cultural education through a strategic approach that helps to coordinate existing activities, build links between cultural institutions, schools and local authorities and raise awareness of the high quality provision on offer. Supporting London's universities in providing a source of innovation and skills for the sector.</li> <li>• Working on the quality of internships and apprenticeships and encouraging volunteering, pathways into the sector will be improved.</li> <li>• Infrastructure, environment and the public realm – need for planning and development to encourage culture to flourish in the capital's venues and public spaces. Highlights importance of cultural and creative industries as factors in regeneration</li> </ul>	<p>recommendations for how to strengthen the cultural life of Londoners.</p> <p>There are no specific targets and indicators in this document.</p>	<p>promote and enhance cultural vitality.</p> <p>The Local Plan, where appropriate, should take account of the priorities and recommendations set out within the Strategy.</p>
<b>HEALTH</b>		
<b>The London Health Inequalities Strategy (GLA, 2010)</b>		
<p>The Strategy sets out a framework for partnership action to:</p> <ul style="list-style-type: none"> <li>• Improve the physical health and mental well-being of all Londoners;</li> <li>• Reduce the gap between Londoners with best and worst health outcomes;</li> <li>• Create the economic, social and environmental conditions that improve quality of life for all; and</li> <li>• Empower individuals and communities to take control of their lives, with a particular focus on the most disadvantaged.</li> </ul>	<p>The key objectives of the Strategy are:</p> <ul style="list-style-type: none"> <li>• Empowering individuals and communities to improve health and well-being;</li> <li>• Improve access to high quality health and social care services particularly for Londoner who have poor health outcomes;</li> </ul>	<p>Include SA objective which seeks to reduce health inequalities and contributes to improved health and wellbeing.</p> <p>The Local Plan should take account of the framework and objectives outlined to address health inequality in London.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> <li>• Reduce income inequality and the negative consequences of relative poverty;</li> <li>• Increase the opportunities for people to access the potential benefits of good work and meaningful activity; and</li> <li>• Develop and promote London as a healthy place for all.</li> </ul>	
<b>NOISE</b>		
<b>The Mayor's Ambient Noise Strategy (2004)</b>		
<p>The overall vision of the Strategy is to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework.</p> <p>The objectives underpinning this vision are:</p> <ul style="list-style-type: none"> <li>• To minimise the adverse impacts of road traffic noise;</li> <li>• To encourage preferential use of vehicles which are quieter in their operating conditions;</li> <li>• To minimise the adverse impacts of noise from freight and servicing;</li> <li>• To promote effective noise management on rail networks in London;</li> <li>• To minimise the adverse impacts of aircraft noise in London, especially at night;</li> <li>• To minimise the adverse impacts of noise on or around London's rivers and</li> </ul>	<p>There are no specific targets or indicators in this document</p>	<p>Include SA objectives to manage and reduce the adverse impacts of ambient noise.</p> <p>The Local Plan should seek to minimise adverse noise impacts taking into account the objectives and policies set out within the Strategy.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>canals, while retaining working wharves and boatyards, and enhancing water space tranquillity and soundscape quality;</p> <ul style="list-style-type: none"> <li>• To minimise the adverse impacts of industrial noise, recognising the use of best practicable means/ best available techniques, and the need to retain a diverse and sustainable economy;</li> <li>• To improve noise environments in London's neighbourhoods, especially for housing, schools, hospitals and other noise-sensitive uses;</li> <li>• To protect and enhance the tranquillity and soundscape quality of London's open spaces, green networks and public realm</li> </ul>		
<b>WASTE</b>		
<b>The Mayor's Municipal Waste Management Strategy (GLA, 2011)</b>		
<p>The Strategy sets out an overarching framework of policy until 2031. Underpinning this framework there are four objectives:</p> <ul style="list-style-type: none"> <li>• Provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste: to reduce the amount of waste generated, encourage the reuse of items that are currently thrown away, and to recycle or compost as much material as possible;</li> <li>• Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste;</li> <li>• Unlock the economic value of London's municipal waste through increased levels of reuse, recycling, composting and the generation of low carbon energy from waste;</li> <li>• Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure.</li> </ul>	<p>Achieving the Mayor's net self-sufficiency targets set out in The London Plan:</p> <ul style="list-style-type: none"> <li>• To achieve zero municipal waste direct to landfill by 2025.</li> <li>• To reduce the amount of household waste produced from 970kg per household in 2009/10 to 790kg per household by 2031. This is equivalent to a 20 per cent reduction per household. To increase London's capacity to reuse or repair municipal waste from approximately 6,000 tonnes a</li> </ul>	<p>Include SA objectives to minimise the environmental impact of waste and promote recycling.</p> <p>The Local Plan should promote the objectives of the Strategy.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>year in 2008 to 20,000 tonnes a year in 2015 and 30,000 tonnes a year in 2031.</p> <p>To recycle or compost at least 45 per cent of municipal waste by 2015, 50 per cent by 2020 and 60 per cent by 2031.</p> <ul style="list-style-type: none"> <li>• To cut London's greenhouse gas emissions through the management of London's municipal waste, achieving annual greenhouse gas emissions savings of approximately:           <ul style="list-style-type: none"> <li>- 545,000 tonnes of CO<sub>2</sub>eq in 2015</li> <li>- 770,000 tonnes of CO<sub>2</sub>eq in 2020</li> <li>- One million tonnes of CO<sub>2</sub>eq in 2031</li> </ul> </li> <li>• To generate as much energy as practicable from London's organic and non-recycled waste in a way that is no more polluting in carbon terms than the energy source it is replacing.</li> </ul>	
<b>The Mayor's business waste strategy for London (GLA, 2011)</b>		

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>The overriding aims are to:</p> <ul style="list-style-type: none"> <li>• focus on waste reduction and the more efficient management of resources to reduce the financial and environmental impact of waste</li> <li>• manage as much of London's waste within its boundaries as practicable, by taking a strategic approach to developing new capacity</li> <li>• boost recycling performance and energy generation to deliver environmental and economic benefits to London.</li> </ul>	<p>The Mayor's key targets for the management of business waste are as follows:</p> <ul style="list-style-type: none"> <li>• achieve 70 per cent reuse, recycling and composting of C&amp;I waste by 2020, maintaining these levels to 2031</li> <li>• achieve 95 per cent reuse, recycling and composting of CDE waste by 2020, maintaining these levels to 2031.</li> </ul>	<p>Include SA objectives to minimise the environmental impact of waste and promote recycling.</p> <p>The Local Plan should promote the objectives of the Strategy.</p>
<b>WATER</b>		
<b>The Mayor's Water Strategy – Securing London's Water Future (GLA, 2011)</b>		
<p>The Strategy promotes increasing water efficiency and reducing water wastage to balance supply and demand for water, safeguard the environment and help tackle water affordability problems.</p> <p>The key objectives of the Strategy are:</p> <ul style="list-style-type: none"> <li>• To use the water London already has more effectively and efficiently;</li> <li>• To minimise the release of untreated wastewater and diffuse pollution into the water environment;</li> <li>• To manage, and where possible reduce, the threat of flooding to people and their property; and</li> <li>• To reduce the greenhouse gas emissions produced from supplying water and treating wastewater.</li> </ul>	<p>Ofwat has introduced a mandatory water efficiency target from 2010 to 2015. The Base Service Water Efficiency (BSWE) target requires water companies to work with customers to save one litre of water per household per day per year.</p> <p>National planning policy states that all new social housing must be built to Code for Sustainable Homes Level 3 target of 105 litres per person per day (l/p/d) and from April 2011, all new private housing must be built to 125 l/p/d.</p>	<p>The SA framework should include objectives which seek to promote water efficiency and reduce water wastage, and incorporation of SUDS and integrated urban drainage.</p> <p>The Local Plan must seek to promote and enforce the objectives set out within the Strategy, specifically the pursuit of more sustainable water resource use in new developments.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
	The London Plan (Policy 5.15) states that all new homes in London should meet the 105 l/p/d standard, whilst the Mayor's Supplementary Planning Guidance on Sustainable Design and Construction encourages developers to aim for 80 l/p/d.	
<b>OPEN SPACE AND LANDSCAPE</b>		
<b>London Plan - All London Green Grid Supplementary Planning Document and Area Framework for Lee Valley and Finchley Ridge (GLA, 2012)</b>		
The concept of a 'green grid' i.e. an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways is at the centre of the London Plan's approach to the provision, enhancement and management of green infrastructure. This network of spaces functions best when designed and managed as an interdependent 'grid'. The ALGG SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations; and the economic and social uplift these support	There are no specific targets or indicators in this document	Include a SA objective which seeks to promote the network of open spaces within the Borough. The Local Plan should seek to promote a network of high quality open spaces as set out within the SPG.
<b>London's Natural Signature and Lea River Valley Natural Landscape Area (January 2011)</b>		
Since a lack of widespread awareness of the underlying nature of London has been a major cause of the gradual erosion of London's natural character –	There are no specific targets or indicators in this document	The SA Framework should include objectives relating to preserving the

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
through for example the culverting and canalising of rivers and the felling of native woodlands – as well as of the neglect of those remnants of natural landscapes which appear to have no obvious amenity value, there is a clear demand for a succinct and evocative way of distilling and expressing this essence. The Natural Signatures are a means of encapsulating and evoking the key natural characteristics of the Natural Landscape Areas		quality of the natural environment and Natural Landscape Areas.  The Local Plan should ensure the natural character of the area is preserved and enhanced.
<b>The canopy – London's Urban Forest – A guide for designers, planners and developers (2011)</b>		
The document provides detail on the challenges and city pressures as well as benefits, technical solutions and real value that trees have for city environments.  Provides guidance on how to integrate trees into the city landscape.	There are no specific targets or indicators in this document	Include an SA Objective regarding improving addressing the impacts of climate change.  Local Plan should recognise the benefits trees can create for city environments including retention and net increase, and policies should address these issues.
<b>RIVERS AND CATCHMENTS</b>		
<b>River Basin Management Plan, Thames River Basin District (2009 update imminent)</b>		
The plan focuses on the protection, improvement and sustainable use of the water environment. River basin management is the approach the Environment Agency is using to ensure combined efforts from organisations and individuals in order to achieve the improvement needed in the Thames River Basin District. The plan addresses the main issues for the water environment and the actions needed to deal with them.	<ul style="list-style-type: none"> <li>• By 2015, 22% of surface waters (rivers, lakes, estuaries and coastal waters) are going to improve for at least one biological, chemical or physical element.</li> </ul>	The SA Framework should include objectives that consider effects upon water quality and water resources.  The Local Plan should consider how the water environment can be protected and

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>Measures to achieve good status for water bodies and to prevent deterioration may be carried out by a range of 'co-deliverers' including local planning authorities and developers.</p> <p>NB 2015 represents the start of the second phase of the River Basin Management Plan. 2027 is the final deadline for reaching good status under WFD.</p>	<ul style="list-style-type: none"> <li>• 25% of surface waters will be at good or better ecological status.</li> <li>• 17% of groundwater bodies will be at good overall status by 2015.</li> <li>• At least 30% of assessed surface waters will be at good or better biological quality by 2015.</li> </ul>	enhanced.
<b>Thames Estuary 2100 Action Plan: Managing Flood Risk Through London and the Thames Estuary (EA, 2012)</b>		
Include SEA objectives relating to the provision of new/retention of existing social infrastructure.	<p>For the first 25 years (2010-2035), the Strategy seeks to:</p> <ul style="list-style-type: none"> <li>• Continue to maintain the current flood defence system – including planned improvements;</li> <li>• Ensure that effective floodplain management (emergency and spatial planning) is in place across the estuary;</li> <li>• Safeguard areas that will be required for future changes to the flood defences;</li> <li>• Monitor change indicators including sea level rise and climate change and review</li> </ul>	<p>The SA framework should include objectives/indicators which seek to reduce the risk and manage flooding sustainably.</p> <p>The Local Plan should take into account the objectives set out within the Plan.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
	the Plan as required.	
<b>Thames Catchment Flood Management Plan (EA, 2009)</b>		
Catchment Flood Management Plans helps to understand the scale and extent of flooding now and in the future, and set policies for managing flood risk within the catchment. Catchment Flood Management Plans should be used to inform planning and decision making by key stakeholders. Catchment Flood Management Plans aim to promote more sustainable approaches to managing flood risk. The policies identified in the Catchment Flood Management Plan will be delivered through a combination of different approaches. Together with our partners, we will implement these approaches through a range of delivery plans, projects and actions.	There are no specific targets or indicators in this document	The SA Framework should include objectives that promote reduction and management of flood risk.  The Local Plan should consider how sustainable approaches to managing flood risk can be incorporated.
<b>HERITAGE</b>		
<b>Archaeology and Planning in Greater London: A charter for Greater London Archaeology Advisory Service (2011)</b>		
This Charter sets out how English Heritage will provide archaeological advice in Greater London in accordance with government policy as set out in Planning Policy Statement 5 –Planning for the Historic Environment, supported by the Historic Environment Practice Guide issued in March 2010.  The charter sets out how the Greater London Archaeology Advisory Service (GLAAS) should be consulted on archaeological issues during the planning process to ensure that there is consistency across London. It sets out the role of GLAAS and how it can work with the boroughs and other partners to sustain and manage the archaeological interest of London's historic environment for future generations.	<ul style="list-style-type: none"> <li>• Scheduled Ancient Monuments</li> <li>• Archaeological Priority Zones</li> <li>• Locally Important Remains</li> <li>• National Important Remains</li> </ul>	The SA Framework should include an objective around protecting archaeological heritage.  The Local Plan should include policies that relate to archaeological protection, including sufficient archaeological investigations as part of the planning process.

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>Olympic Legacy Supplementary Planning Guidance (2012)</b>		
<p>The core development principle that guides the legacy of the Olympics is convergence, meaning that 20 years on from the 2012 Olympics the area 'will be one of the best places in London to live and work'.</p> <p>This is supported by five overarching development principles:</p> <ul style="list-style-type: none"> <li>• Homes and communities</li> <li>• Business and employment</li> <li>• Connectivity and transport</li> <li>• Urban form</li> <li>• Open space and sustainable development.</li> </ul>	<p>The Mayor of London and leaders of the host boroughs identified seven core outcomes to test the success of the LLDC area which are:</p> <ul style="list-style-type: none"> <li>• Creating a coherent and high quality city within a world city region</li> <li>• Improving educational attainment, skills and raising aspirations</li> <li>• Reducing worklessness, benefit dependency and child poverty.</li> <li>• Homes for all</li> <li>• Enhancing health and wellbeing</li> <li>• Reducing serious crime rates and anti-social behaviour</li> <li>• Maximising sports legacy and increasing participation.</li> </ul> <p>Targets align with those of the London Plan.</p>	<p>The SA Framework should include objectives which reflect the employment, design, facilities and housing etc objectives in this guidance.</p> <p>The Local Plan should include policies that reflect the guidance in this document.</p>

## London Borough of Tower Hamlets Policy

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<b>PLANNING AND STRATEGY</b>		
<b>Urban Structure and Characterisation Study 2009</b>		
<p>The study is divided into several chapters. Chapters 1 and 2 introduce the purposes and aims of the study and a summary of research. The third chapter sets out and analyses the historical growth of the borough and its impact on the image, shape and identity of Tower Hamlets today. The fourth chapter presents a 'present-day' borough-wide analysis from a series of urban design perspectives, including movement routes and block pattern. This borough-wide analysis, alongside the historical analysis, provides a basis on which to present the 'places of today' (the hamlets). These places of today are then explored and analysed in brief, illustrated character assessments, setting out the historical and built processes that have come to form the townscape and identity of that place. Chapter six draws together all the previous analysis to present a series of recommendations for spatial planning in Tower Hamlets.</p> <p>This study provides part city analysis and part characterisation of the borough. It is rooted in an appreciation and understanding of urban design and how it can assist in creating locally distinct spatial planning. It is therefore not exhaustive in its scope, but was selective in its critique, appropriate to the needs of supporting the creation of a spatial Core Strategy DPD.</p>	<p>There are no specific targets or indicators in this document.</p>	<p>Local Plan and SA to draw on the work setting out the character of places and the place-based approach.</p>
<b>Tower Hamlets Core Strategy &amp; Managing Development Plan Document 2025 (adopted 2010)</b>		
<p>The Core Strategy sets out an ambitious and long-term spatial strategy to deliver the aspirations set out in the Community Plan. It sets out broad areas and principles, and where, how and when development should be delivered across the borough until 2025. It is also outcome-focused, and does not solely relate to development decisions.</p>	<ul style="list-style-type: none"> <li>• Strategic target for affordable homes of 50% until 2025.</li> <li>• 35%-50% affordable homes on sites providing 10 new residential units or more (subject to viability).</li> </ul>	<p>The SA Framework should use the evidence base and monitoring reports from the Core strategy and DPD to reflect ongoing and emerging issues.</p> <p>The objectives and guidance within the</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>It is not the role of the Core Strategy to set out detailed policies in relation to planning applications set out site specific policies and allocations set out defined boundaries on an OS-based map. The Core Strategy seeks to understand the roles and opportunities of each place in the borough. It brings these opportunities together to enable shared success across the borough and deliver the vision of One Tower Hamlets.</p> <p>Tower Hamlets will reinvent, strengthen and transform the places that make the borough unique. It will continue to be a place for diverse communities, building on its strategic importance as a unique part of inner London.</p>	<ul style="list-style-type: none"> <li>• An overall strategic tenure split for affordable homes from new development as 70% social rented and 30% intermediate.</li> <li>• An overall target of 30% of all new housing to be of a size suitable for families (three-bed plus), including 45% of new social rented homes to be for families.</li> </ul>	Local Plan should update the Core Strategy and DPD.
<b>Tower Hamlets Community Plan to 2020 (2015)</b>		
<p>The Community Plan is a strategic document which seeks to improve the lives of all those living and working in the Borough.</p> <p>The aim of the 2020 Community Plan is to "improve the quality of life for everyone who lives and works in the borough."</p>	<p>The Plan has four key visions:</p> <ul style="list-style-type: none"> <li>• A great place to live;</li> <li>• A prosperous and fair community;</li> <li>• A safe and cohesive community; and</li> <li>• A healthy and supportive community.</li> </ul> <p>There are 4 new cross cutting priorities:</p> <ul style="list-style-type: none"> <li>• Empowering residents and building resilience</li> <li>• Promoting healthier lives</li> <li>• Increasing employment</li> <li>• Responding to population</li> </ul>	<p>Include SA objectives to cover the key visions, as far as these issues are relevant to the Local Plan area.</p> <p>The Local Plan should take into account the issues raised in the Plan, ensuring the visions outlined can be met.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
	growth	
<b>TRANSPORT AND MOBILITY</b>		
<b>Tower Hamlets Local Implementation Plan 2 2011-2031 (2011)</b>		
The Local Implementation Plan (LIP) 2 will help to deliver a better, more sustainable, transport system that contributes towards shaping the identity of Tower Hamlets and improving quality of life for all by meeting local priorities.	<p>LIP2 contains nine transport objectives for the Borough:</p> <ul style="list-style-type: none"> <li>• To promote a transport environment that encourages sustainable travel choices for all;</li> <li>• To ensure the transport system is safe and secure for all in the borough;</li> <li>• To ensure the transport system is efficient and reliable in meeting the present and future needs of the borough's population and economy;</li> <li>• To reduce the impact of transport on the environment and wellbeing;</li> <li>• To ensure transport is accessible for all;</li> <li>• To encourage smarter travel behaviour;</li> <li>• To better integrate land use and transport planning policy and programmes;</li> <li>• To protect, celebrate and improve sustainable access to</li> </ul>	<p>Include SA objectives to improve the sustainability, efficiency and reliability of the transport network within the Borough.</p> <p>The Local Plan should seek to meet the transport objectives outlined in LIP2.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<p>the borough's cultural, historical and heritage assets to enhance local distinctiveness, character and townscape views; and</p> <ul style="list-style-type: none"> <li>• To maximise the benefits and opportunities offered by the London 2012 Games and its legacy.</li> </ul> <p>These objectives contribute to the overall transport vision for Tower Hamlets and are supported by a delivery plan and programme for investment.</p>	
<b>The Cycling Plan for Tower Hamlets (2015)</b>		
The Cycling Plan aims to promote the use of bicycles as an effective and enjoyable means of transport and reduce the need to travel by car.	<p>The Plan is underpinned by 32 pledges and four targets:</p> <ul style="list-style-type: none"> <li>• Double the volume of cyclists in the borough</li> <li>• Increase the proportion of residents cycling to work to 15%</li> <li>• Reduce the risk of cyclist accidents by half</li> <li>• Double the number of children cycling to school</li> </ul>	<p>Include a SA objective which seeks to increase the use of travel by bicycle.</p> <p>The Local Plan should seek to promote cycling and take into account the objectives outlined within the Cycling Plan.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>Tower Hamlets Walking Plan 2011-2021 (2011)</b>		
<p>The Walking Plan is part of Council's Sustainable Transport Strategy and is consistent with the borough's overarching transport objectives.</p> <p>The plan sets out a vision that by 2021, 'Tower Hamlets will offer a high quality pedestrian environment and be a place where walking is the clear choice for all who live in, work in and visit the borough.</p>	<p>The vision is supported by four objectives:</p> <ol style="list-style-type: none"> <li>1. Enhance the Walking Network</li> <li>2. Improve Pedestrian Safety and Security.</li> <li>3. Integrate Walking Across Policy Areas.</li> <li>4. Promote Walking to the Community.</li> </ol> <p>These objectives are further detailed with steps and priorities to meet these objectives.</p>	<p>The SA Framework should include objectives, indicators and targets which address health issues and deprivation and seek to reduce health inequalities.</p>
<b>HEALTH AND WELLBEING</b>		
<b>Tower Hamlets Joint Strategic Needs Assessment (2015)</b>		
<p>The Joint Strategic Needs Assessment (JSNA) is a requirement under the Local Government and Public Involvement in Health Act 2007. It stipulates that local authorities and Primary Care Trusts (PCTs) should work jointly to produce it, in order to produce a picture of the health and well-being needs of the local population.</p>	<p>The JSNA provides data and measures on a range of health indicators. These can be used where appropriate to develop SA Framework indicators.</p>	<p>Improving the population of the borough's health and wellbeing should be incorporated as an SA objective.</p> <p>This document should be considered within the Local Plan.</p>
<b>Tower Hamlets Health and Wellbeing Strategy 2006 – 2016 (Refresh approved 2012)</b>		

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>Since the 2006: Improving Health and Wellbeing Strategy and the 2009: Refreshed Delivery Plan, significant progress has been made against the 5 strategic aims:</p> <ul style="list-style-type: none"> <li>• Reduce inequalities in health and wellbeing</li> <li>• Improve the experience of people who use our services</li> <li>• Develop excellent integrated and more localised services</li> <li>• Promoting independence, choice and control</li> <li>• Invest resources effectively</li> </ul> <p>The new strategy needs to build on what went before, be ambitious for the residents of Tower Hamlets and prioritize the areas for collective action.</p>	<p>The Strategy provides data and measures on a range of health indicators. These can be used where appropriate to develop SA Framework indicators.</p>	<p>The SA Framework should include objectives, indicators and targets which address health issues and deprivation and seek to reduce health inequalities.</p> <p>The Local Plan needs to recognise the role that land use planning can play in enhancing quality of life and health. The pursuit of active travel and health lifestyles should be encouraged.</p>
<b>Mental Health Strategy 2014 – 2019 (2014)</b>		
<p>This Mental Health Strategy sets out the Tower Hamlets Health and Well-Being Board's vision for improving outcomes for people with mental health problems in Tower Hamlets.</p> <p>Three pillars, of building resilience in our population, ensuring high quality treatment and support, and supporting people to live well with a mental health problem</p>	<p>No specific targets of relevance</p>	<p>The SA Framework should include objectives, indicators and targets which address health issues and deprivation and seek to reduce health inequalities.</p> <p>The Local Plan needs to recognise the role that land use planning can play in enhancing quality of life and health and wellbeing, including mental health.</p>
<b>COMMUNITY</b>		
<b>Tower Hamlets Community Safety Plan 2013 -16 (2014)</b>		
<p>The Community Safety Plan is a key document, established by the Tower Hamlets Partnership to ensure that actions towards achieving the Community Plan Vision and Safe and Cohesive theme are delivered.</p>	<p>Indicators included within this plan include:</p> <ul style="list-style-type: none"> <li>• Number of Arson incidents (all</li> </ul>	<p>The SA Framework should include objectives that complement this plan.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>To make Tower Hamlets a Safe and Cohesive Community the Partnership focus on achieving the following objectives:</p> <ul style="list-style-type: none"> <li>• Gangs and Serious Youth Violence</li> <li>• Anti-Social Behaviour (ASB) and Arson</li> <li>• Drugs and Alcohol</li> <li>• Violence (including Domestic Violence and Violence against Women and Girls)</li> <li>• Prostitution</li> <li>• Hate Crime and Community Cohesion</li> <li>• Killed or Seriously Injured on our roads</li> <li>• Property/Serious Acquisitive Crime</li> <li>• Public Confidence and Satisfaction</li> <li>• Reducing Re-offending</li> <li>• MOPAC 7 (Mayor's Office of Policing and Crime priority neighbourhood crimes)</li> </ul>	<ul style="list-style-type: none"> <li>• deliberate Fires)</li> <li>• Number of Deliberate Fires (Deliberate)</li> <li>• Number of Grass/open land fires – deliberate and unknown</li> <li>• Number of Rubbish Fires – deliberate and unknown</li> <li>• Number of 'Most serious violence' offences</li> <li>• Number of Gun Crimes and Gun Crime</li> <li>• Number of Knife Crimes and Knife crime</li> <li>• Number of Assaults with Injury</li> <li>• Number of Serious Acquisitive Crimes</li> <li>• Number of Personal Robberies</li> <li>• Number of Commercial Robberies</li> <li>• Total Robbery numbers</li> <li>• Number of Residential Burglaries</li> <li>• Number of thefts of Motor Vehicles</li> <li>• Number of thefts From Motor Vehicles</li> <li>• Number of Serious Youth Violence and Youth Violence</li> </ul>	<p>The local plan needs to take on board the key objectives of this plan which would contribute to the development of safe communities.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<p>offences</p> <ul style="list-style-type: none"> <li>• Rate of proven re-offending by young offenders</li> <li>• Number of domestic Violence Offences</li> <li>• Domestic Violence Rate</li> <li>• Domestic Offence Arrest Rate</li> <li>• Number of rapes</li> <li>• Number of other Serious Sexual Offences</li> <li>• Number of repeat incidents of domestic violence</li> <li>• Number of drug intervention programme referrals that re-offend</li> <li>• Number of drug users recorded as being in effective treatment</li> <li>• Perception of drug use or drug dealing as a problem</li> <li>• Offenders under probation supervision living in settled and suitable accommodation at the end of their order or licence</li> <li>• Drug intervention programme referrals that re-offend</li> <li>• Offenders under probation supervision in employment at the end of their order or license</li> </ul>	

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<ul style="list-style-type: none"> <li>• Rate of proven re-offending by adults under probation supervision</li> <li>• Adult re-offending rates for those under probation supervision</li> <li>• Racist Offences</li> <li>• Homophobic Offences</li> <li>• % of people who believe people from different backgrounds get on well together in their local area</li> </ul>	
<b>Statement of Community Involvement Tower Hamlets (2009)</b>		
This Statement sets out how the Council will involve all elements of the community in the planning process, both in the preparation of planning policy and involvement in planning applications.	There are no specific targets or indicators in the statement.	<p>Sufficient time should be provided for consultation on the SA documents.</p> <p>The Local Plan should be mindful of this statement as its development should be a transparent process.</p>
<b>HOUSING</b>		
<b>Tower Hamlets Strategic Housing Market and Needs Assessment (2009) NB 2015 draft awaited</b>		
The aim of the Strategic Housing Market and Needs Assessment aims to inform policy development and investment decisions across the study area. It should provide an evidence base to: <ul style="list-style-type: none"> <li>• Ascertain the nature and level of current housing demand and need in the</li> </ul>	Targets include: <ul style="list-style-type: none"> <li>• National annual target is for at least 60 per cent of new housing to be provided on</li> </ul>	This document provides contextual data which should be considered in the SA baseline.

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>Borough.</p> <ul style="list-style-type: none"> <li>• Obtain an understanding of the likely characteristics of the future housing market.</li> <li>• Estimate the future number of households requiring market and affordable housing.</li> <li>• Inform policies aimed at providing the right mix of housing in the future – both market and affordable, including the size of affordable housing required.</li> <li>• Understand the housing requirements of particular groups.</li> <li>• Inform the Council's Local Development Framework which will set out their spatial planning strategies.</li> <li>• Inform policy making and investment decisions locally and regionally.</li> </ul> <p>A Tower Hamlets Housing Partnership was established to oversee the SHMA consisting of a multi-disciplinary team including housing, planning, economic development and regeneration expertise. The role of the Strategic Housing Market and Needs Assessment partnership is to consider housing needs and issues across the borough and included core representatives from Registered Social Landlords and the Housing Corporation, in addition to housing and planning representatives.</p>	previously developed land.	<p>The SA Framework should include objectives that consider decent, high quality affordable housing.</p> <p>This document should be considered within the Local Plan.</p>
<b>Tower Hamlets Housing Strategy 2009-2012 (2009) (NB Current strategy is also contained in the below statements*)</b>		
<p>To accelerate positive change in housing issues the Council must maximise its use of powers, resources and people. It needs to effectively generate external resources and get the most from partnership working in meeting shared objectives.</p> <p>The key Strategic Objectives are centres around four main strategic housing themes:</p>	<p>Tower Hamlets will seek a strategic target 50% affordable housing on all housing developed in the borough, applying 35% on individual sites.</p> <p>45% of the social rented element</p>	<p>The SA Framework should include objectives that consider decent, high quality affordable housing.</p> <p>This document should be considered within the Local Plan.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>• Delivering and Managing Decent Homes</li> <li>• Placemaking and Sustainable Communities</li> <li>• Managing Demand, Reducing Overcrowding</li> <li>• New Housing Supply</li> </ul>	<p>of new developments to be for large family purposes (i.e. three bedrooms or more) either provided onsite, or where delivery proves unsustainable, provided offsite; 25% of the intermediate and market homes should have three bedrooms or more.</p> <p>All new housing developments to meet the Government's national target of zero carbon housing by 2016.</p> <p>Maximise Lifetime Homes Standards in new housing stock and seek at least 10% of all new homes to be wheelchair accessible.</p>	
<b>*Tower Hamlets Homelessness Statement 2013 -17(2013)</b>		
<p>4 central themes to form the basis of the 2013-17 strategy:</p> <ul style="list-style-type: none"> <li>• Homeless prevention and tackling the causes of homelessness;</li> <li>• Access to affordable housing options;</li> <li>• Children, families and young people; and</li> <li>• Vulnerable adults.</li> </ul>	<p>There are no specific targets or indicators of relevance.</p>	<p>The SA Framework should include objectives that address housing issues including homelessness.</p> <p>The Local Plan should recognise the causes of homelessness and contribute to its prevention where possible (however its contribution may be limited).</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>*Older People's Housing Statement 2013 -2015 (2013)</b>		
<p>The Statement has two key aims and six objectives:</p> <p>Aim 1: Provide a range of good quality accommodation and access to home adaptations and improvements that offers older people housing that meets their needs.</p> <p>Aim 2: Help older people to continue to remain active, independent and healthy in their homes supported by flexible inclusive and affordable services.</p> <p>Objective 1: 'CHOICE' Provide a range and choice of housing across all tenures for older people in Tower Hamlets.</p> <p>Objective 2: 'QUALITY' Ensure older people are able to access a mix of high quality, well designed housing suitable for their changing needs and aspirations.</p> <p>Objective 3: 'INDEPENDENT' Make sure older people are supported to remain independent, healthy and safe in their home.</p> <p>Objective 4: 'ACCESSIBLE' Increase access to information and advocacy services required by older people.</p> <p>Objective 5: 'INCLUSIVE' Promote equality, participation and engagement between older people.</p> <p>Objective 6: 'VALUE'</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The SA Framework should include objectives that address housing issues for older people.</p> <p>The Local Plan should recognise the housing needs of older people and contribute towards meeting them.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
Continue to provide flexible, well procured, affordable services for residents.		
<b>*Overcrowding and Under occupation Statement 2013 – 2015 (2013)</b>		
<p>The three strategic aims for tackling and reducing overcrowding are;</p> <ul style="list-style-type: none"> <li>• Reduce overcrowding in existing housing stock, and put in place preventative measures to reduce future overcrowding</li> <li>• Continue to increase the overall supply of housing for local people including a range of affordable, family housing</li> <li>• Prevent overcrowding and homelessness by providing access to the right housing options at the right time including a set of measures designed to reduce under occupation.</li> </ul> <p>There are four sets of actions:</p> <ul style="list-style-type: none"> <li>• Property based actions</li> <li>• Lettings based actions</li> <li>• Advice and partnership based actions</li> <li>• Under occupation based actions.</li> </ul>	<p>Statement includes a number of targets, including:</p> <p>Increase supply of larger family sized social stock to help overcrowded households on the waiting list.</p> <p>Undertake knock-throughs</p> <p>Use empty properties to house overcrowded households and offer grants to overcrowded existing owner occupiers</p>	<p>The SA Framework should include objectives to reduce overcrowding and under occupancy.</p> <p>The Local Plan should recognise the need for suitable affordable housing of a range of sizes to meet the population's diverse needs</p>
<b>BIODIVERSITY</b>		
<b>Tower Hamlets Local Biodiversity Action Plan 2014-19 (2014)</b>		
<p>The plan identifies priority habitats and species in Tower Hamlets, and sets objectives and, where appropriate, targets for what needs to be done to ensure their conservation. This will inform the implementation of projects and actions by partner organisations. It also provides guidance to developers on the kinds of biodiversity enhancements expected in new developments.</p> <p>The LBAP contains four action plans based around the major land uses in the borough: the built environment;</p>	<p>The Local Biodiversity Action Plan (LBAP) contains a range of objectives and targets for the promotion and protection of species and habitats.</p> <p>It also includes actions different partners can take to promote</p>	<p>Include SA objectives which seek to protect and enhance biodiversity and address areas of deficiency.</p> <p>The Local Plan should take into account the objectives and actions set out within the LBAP.</p>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
gardens and grounds; rivers and standing water; and parks, squares and burial grounds.	biodiversity.	
<b>WATER AND FLOOD</b>		
<b>Tower Hamlets Surface Water Management Plan (2011)</b>		
<p>A SWMP outlines the preferred surface water management strategy in a given location. Surface water describes flooding from sewers, drains, groundwater, and runoff from land, small water courses and ditches that occurs as a result of heavy rainfall.</p> <p>The document also establishes a long-term action plan to manage surface water and will influence future capital investment, maintenance, public engagement and understanding, land use planning, emergency planning and future developments.</p> <p>The objectives of the SWMP are to:</p> <ul style="list-style-type: none"> <li>• Develop a robust understanding of surface water flood risk in and around the study area, taking into account the challenges of climate change, population and demographic change and increasing urbanisation in London.</li> <li>• Identify, define and prioritise Critical Drainage Areas, including further definition of existing local flood risk zones and mapping new areas of potential flood risk.</li> <li>• Make holistic and multifunctional recommendations for surface water management which improve emergency and land use planning, and enable better flood risk and drainage infrastructure investments</li> <li>• Establish and consolidate partnerships between key drainage stakeholders to facilitate a collaborative culture of data, skills, resource and learning sharing and exchange, and closer coordination to utilise cross boundary</li> </ul>	<p>The SWMP recommended the inclusion of the following policies to reduce flood risk:</p> <p><b>Policy 1:</b> All developments across the borough (excluding minor house extensions less than 250m<sup>2</sup>) which relate to a net increase in impermeable area are to include at least one 'at source' SuDS measure (e.g. waterbutt, rainwater harvesting tank, bioretention planter box etc). This is to assist in reducing the peak volume of runoff discharging from the site.</p> <p><b>Policy 2:</b> Proposed 'brownfield' redevelopments greater than 0.1 hectare are required to reduce post development runoff rates for events up to and including the 1 in 100 year return period event with an allowance for climate change (in line with PPS25 and UKCIP guidance)</p>	<p>The SA Framework should include objectives that promote surface water management,</p> <p>The Local Plan should seek to prevent development that may exacerbate surface water flooding.</p>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<p>working opportunities</p> <ul style="list-style-type: none"> <li>• Undertake engagement with stakeholders to raise awareness of surface water flooding, identify flood risks and assets, and agree mitigation measures and actions</li> <li>• Deliver outputs to enable a real change on the ground whereby partners and stakeholders take ownership of their flood risk and commit to delivery and maintenance of the recommended measures and actions</li> <li>• Meet borough specific objectives as recorded at the outset of the development of the SWMP.</li> <li>• Facilitate discussions and report implications relating to wider issues falling outside the remit of this Tier 2 work, but deemed important by partners and stakeholders for effectively fulfilling their responsibilities and delivering future aspects of flood risk management</li> </ul>	<p><i>to 50% of the existing site conditions. If this results in a discharge rate lower than the Greenfield conditions it is recommended that the Greenfield rate (calculated in accordance with IoH124) are used.</i></p> <p><b>Policy 3:</b> <i>Developments located in Critical Drainage Areas (CDAs) and greater than 0.5 hectare are required to reduce runoff to that of a predevelopment Greenfield runoff rate (calculated in accordance with IoH124). It is recommended that a SuDS treatment train is utilised to assist in this reduction.</i></p>	
<b>Tower Hamlets Local Flood Risk Management Strategy (2015 Consultation Draft)</b>		
<p>The Local Flood Risk Management Strategy (LFRMS) is designed to provide guidance and information for residents, businesses and developers regarding Tower Hamlets strategy for dealing with flooding within the borough. The document is structured to outline the responsibility of the Lead Local Flood Authority (LLFA), evaluate the risk of flooding and finally review and appraise methods for dealing with flooding in LBTH.</p>	<p>There are no specific targets or indicators within the plan.</p>	<p>The SA Framework should include objectives that promote the reduction and management of flood risk.</p> <p>The Local Plan should consider potential flood risk, and prevent development within the floodplain.</p> <p>The Local Plan should not exacerbate current flood risk issues on the site.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>AIR AND LAND QUALITY</b>		
<b>Tower Hamlets Clean Air Zone Plan 2010 – 2015 (2010)</b>		
<p>The Clear Zone covers an area of approximately 9km<sup>2</sup> in the west of the borough. It borders the City of London in the west and Cambridge Heath Road, Sidney Street, Watney Market, Watney Street, Dellow Street and Wapping Street in the east.</p> <p>Implement a phased package of sustainable transport interventions to improve the environment within the Clear Zone</p> <ol style="list-style-type: none"> <li>1) Reduce air pollution from transport sources to improve air quality in the Aldgate area and across the Clear Zone;</li> <li>2) Improve the urban realm and management of the road network to ensure better connections and increased accessibility within the Clear Zone;</li> <li>3) Reduce noise pollution from transport sources;</li> <li>4) Reduce greenhouse gas emissions from transport sources to help tackle climate change; and</li> <li>5) Ensure future development within the Clear Zone contributes to achieving the Council's Clear Zone objectives.</li> </ol>	<p>The following Clear Zones Measures are included</p> <p>CZ2a Walking Corridor 1  CZ2b Walking Corridor 2  CZ3 Cyclist Crossing Priorities  CZ4 Signage  CZ5 Urban Design Guide  CZ6 Emissions based P&amp;D parking  CZ7 Traffic Reduction Tools  CZ8 Road Hierarchy  CZ9 Awareness Campaigns  CZ10 Electric Vehicle Charging Infrastructure  CZ11 Electric Vehicle Car Clubs  CZ12 Local LEZ  CZ13 Low energy street lighting  CZ14 No Idling Zone  CZ15 d-NOx Paving  CZ16 Out of hours operation  CZ17 Freight Mapping  CZ18 Drop Box Scheme  CZ19 Consolidation Centre/s  CZ20 Supplementary Planning Guidance  CZ21 Construction Logistics Plans</p>	<p>Include SA objectives to maintain and enhance air quality.</p> <p>The Local Plan should take into account the objectives set out in the Clean Air Zone, for that area of the borough.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
	CZ22 Delivery and Servicing Plans CZ23 Travel Plan Toolkit CZ24 Travel Assessment Toolkit	
<b>Tower Hamlets Air Quality Action Plan (LBTH) (2003)</b>		
<p>The Air Quality Action Plan examines the various measures for improving air quality within the Borough.</p> <p>The Plan includes detailed modelling for two key pollutants within the Borough, nitrogen dioxide and particulate matter (PM10) which are mainly emitted from motorised vehicles.</p>	<p>The Plan sets out 10 key objectives which seek to improve air quality within the Borough:</p> <ul style="list-style-type: none"> <li>• Monitor air quality to measure the success of our actions over time.</li> <li>• Use GIS to map trends and target areas for improvement and fully integrate this into the decision making process for the Council's key development strategies.</li> <li>• Actively support and take part in the London wide Vehicle Emissions Testing Scheme.</li> <li>• Use controlled parking mini-zones to target congested parking around tube stations and bordering the Central London Charging Zone.</li> <li>• Implement a comprehensive streetscene programme to improve the street</li> </ul>	<p>Include SA objectives to maintain and enhance air quality.</p> <p>The Local Plan should take into account the objectives set out in the Air Quality Action Plan.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<p>environment in Tower Hamlets. This take a targeted approach to implementing Home Zones in residential areas, improving street signage and removing street clutter, improving safety for cyclists and improving the pedestrian environment.</p> <ul style="list-style-type: none"> <li>• Lead by example by using a fleet of elective vans for Pest Control within Environmental Health, Environmental Protection Division.</li> <li>• Develop Supplementary Planning Guidance for Planning Applications, requiring submission and approval of air quality assessments for major developments before development can commence.</li> <li>• Support and facilitate the development of major transport infrastructure improvements projects in the borough including Crossrail and the two to three car expansion of the Docklands Light Railway.</li> <li>• Support the development and implementation of a Low</li> </ul>	

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
	<ul style="list-style-type: none"> <li>• Emissions Zone for London.</li> <li>• Establish a Council Vehicle Register with a full emissions inventory for Council and Contractors' vehicles together with an emissions improvement programme.</li> </ul>	
<b>Tower Hamlets Contaminated Land Strategy (2013)</b>		
<p>The strategy aims to find and deal with the most seriously contaminated sites first. Contaminated land is where the land in its current condition is causing or is likely to cause significant harm to human health and/or the environment.</p> <p>Aims:</p> <ul style="list-style-type: none"> <li>• To comply with the requirements of Part 2a of the Environmental Protection Act (1990);</li> <li>• To ensure the effects of historic and present contamination are not causing significant risks to human health and/or the environment;</li> <li>• To encourage redevelopment of brownfield sites in accordance with government objectives and strategy;</li> <li>• To complement the planning control system that ensures that risks associated with contamination on a site are appropriately dealt with during redevelopment;</li> <li>• To provide information and respond to requests from the public, businesses and community organisations with increased efficiency and accuracy;</li> <li>• To provide accurate information to the Environment Agency for its National Report on contaminated land;</li> <li>• To compile accurate and up to date information on land contamination in a central location;</li> </ul>	<p>There are no specific targets or indicators within the plan.</p>	<p>Include SA objectives to enhance and maintain soil quality and to ensure contaminated land is identified and decontaminated.</p> <p>The Local Plan should take into account the need to decontaminate land for development.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>• To facilitate and encourage information exchange between council departments and regulatory authorities thereby minimising duplication of work; and</li> <li>• To protect historic sites and the historic environment, especially 'designated historic sites' and areas of local importance.</li> </ul>		
<b>WASTE</b>		
<b>Tower Hamlets Municipal Waste Management Strategy 2003-2018 (2003)</b>		
The Strategy outlines the waste handling arrangements in the Borough.	<p>The Strategy is underpinned by the principles of the waste hierarchy by proposing to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste generated;</li> <li>• Enhance the re-use of unwanted articles;</li> <li>• Provide recycling and composting services;</li> <li>• Recover energy from residual waste;</li> <li>• Minimise waste going to landfill; and</li> <li>• Transfer waste out of the Borough by river via the Northumberland Wharf Waste Transfer Station.</li> </ul>	<p>Include SA objectives which seek to manage municipal waste in a sustainable manner and in line with the waste hierarchy.</p> <p>The Local Plan should take into the account the targets which are set out within the Strategy.</p>
<b>CONSERVATION</b>		
<b>A Conservation Strategy For Tower Hamlets (2010)</b>		

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<p>This Conservation Strategy aims to guide decision-making for Tower Hamlets' heritage over the next 5-10 years. It sets out the long term vision for the heritage, and the Strategy Goals and Work Plan Objectives to help deliver that vision.</p> <p>It provides strategic guidance at the Borough level – it is not a detailed assessment of individual heritage resources.</p>	<p>The Strategy has six key priorities, which are reflected in the six Strategy Goals. These Goals address the key challenges facing Tower Hamlets' heritage. They also respond to government and statutory body guidance, and seek to actively support the Council's broader social and economic regeneration priorities.</p> <p>The Goals are:</p> <ul style="list-style-type: none"> <li>• Understanding the significance of the heritage;</li> <li>• Increasing community pride, ownership and involvement in heritage to promote community cohesion;</li> <li>• Ensuring effective governance and management of the heritage;</li> <li>• Increasing heritage's contribution to regeneration;</li> <li>• Improving the condition of the heritage; and</li> <li>• Ensuring effective protection of the heritage.</li> </ul>	<p>The SA Framework should include objectives that seek to protect heritage assets.</p> <p>The Plan should seek to protect heritage assets within the plan area.</p>
<b>OPEN SPACE</b>		

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<b>Tower Hamlets Open Space Strategy 2006-2016 (2011 mid-point review and update)</b>		
<p>The Open Space Strategy sets out the strategic vision and policy recommendations for the provision of open space arising from the needs assessment and open space audits.</p>	<p>The Strategy sets out a number of overarching outcomes, objectives and actions to address the findings of the assessment and open space audits, including:</p> <ul style="list-style-type: none"> <li>• To improve the overall quality of current provision of open space within the Borough by having no poor quality sites</li> <li>• To create wherever possible new publicly accessible open space by effective use of planning powers and obligations, especially in areas identified as deficient in open space</li> <li>• To improve accessibility to existing and new open spaces</li> <li>• To prioritise public safety in parks</li> <li>• To maximise funding opportunities in order to support the action plan</li> </ul>	<p>Include SA objectives which seeks to protect and increase the provision of open space.</p> <p>The Local Plan, where appropriate should take into account the outcomes, objectives and actions set out within the Open Space Strategy.</p>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<b>Tower Hamlets Green Grid Strategy (2010)</b>		
<p>The Green Grid Strategy seeks to “<i>to create an interlinked network of high quality, multi-functional accessible, ‘green’ open spaces and waterways in Tower Hamlets which will encourage active lifestyles and improve quality of life</i>”.</p> <ul style="list-style-type: none"> <li>• Retain all existing open spaces and walking routes;</li> <li>• Enhance the quality of existing open spaces;</li> <li>• Create new publicly accessible open spaces;</li> <li>• Connect open spaces to local communities with enhanced and new walking routes; and</li> <li>• Manage the Green Grid to a high standard.</li> </ul>	<p>The Strategy’s targets are:</p> <ul style="list-style-type: none"> <li>• No net loss of existing publicly accessible open space through development.</li> <li>• No net loss of walking routes through development.</li> <li>• 100% of Green Grid Open Spaces enhanced through measures to improve accessibility, safety, attractiveness, functionality as appropriate.</li> <li>• Significant increase in currently restricted or partially restricted existing open space made publicly accessible and managed.</li> <li>• Increase in new publicly accessible open space created, managed and protected.</li> <li>• Significant length of Green Grid network enhanced through measures to improve safety, accessibility and attractiveness as appropriate.</li> <li>• 100% of the Green Grid network and Green Grid Open Spaces with approved and</li> </ul>	<p>Include SA objectives which seek to protect and enhance the provision of publicly accessible open spaces and walking routes.</p> <p>The Local Plan should take into account the objectives and targets set out within the Green Grid Strategy.</p>

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
	resourced management plans.	
<b>POVERTY AND EXCLUSION</b>		
<b>Tower Hamlets Fuel Poverty Strategy and Action Plan: Providing Energy Efficiency and Affordability for All 2013-2016 (2013)</b>		
Aims: <ul style="list-style-type: none"> <li>To establish the Energy Co-operative to provide cheap energy to residents and to progress the Fuel Poverty Strategy as a Community Strategy, ensuring its development and implementation is a corporate priority.</li> <li>Provide access to cheap energy for council tenants and residents living in the borough and ensure that homes in the borough are affordable to heat for all including those reliant on state benefits.</li> <li>To Empower, Educate and Inform the resident about how to achieve Affordable Warmth</li> <li>Actively seek and access funding to deliver energy efficiency projects</li> <li>Promote Good practice demonstrations and deliver innovative pilot projects</li> </ul>	There are no specific targets or indicators within the plan.	<p>Include SA objective on reducing Fuel Poverty.</p> <p>The Local Plan should take into account the aims of the Fuel Poverty Strategy and the needs highlighted in its evidence base.</p>
<b>Child Poverty Approach 2013 – 2015 (2013)</b>		
The Approach's Vision is that Tower Hamlets will be a place where no child or family is held back by poverty – a place where everyone has access to opportunities and the chance to achieve their potential.  Four themes have been central to shaping our approach to child poverty locally: <ul style="list-style-type: none"> <li>Removing barriers to work</li> <li>Developing pathways to success</li> <li>Breaking the cycle of poverty</li> <li>Mitigating the effects of poverty</li> </ul>	There are no specific targets or indicators within the plan.	<p>Include SA objective to reduce poverty, especially child poverty.</p> <p>The Local Plan should take into account the key aims of the Child Poverty Approach and help tackle child poverty where possible.</p>

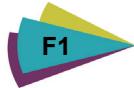
<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<b>ECONOMY AND EMPLOYMENT</b>		
<b>Employment Strategy (2011) To be replaced by the Economic Growth Strategy</b>		
The aim is to achieve convergence with the London employment rate over time through five strategic objectives: 1. Make the mainstream services work better for residents 2. Engage those workless residents detached from the labour market and complement the work of the mainstream 3. Encourage increased aspiration toward engaging with the labour market, particularly for inactive groups 4. Ensure economic investment is co-ordinated and focused 5. Capture employment opportunities for Tower Hamlets residents within the Borough and wider London labour market	The overarching aim of the strategy is to achieve convergence with the London employment rate over time	Include SA objective to increase employment, especially for groups who are disproportionately unemployed.  The Local Plan should take into account the need to increase employment rates in the borough.
<b>Enterprise Strategy (2011) To be replaced by the Economic Growth Strategy</b>		
The strategic aim is to encourage and support enterprise and entrepreneurial activity to increase opportunity, prosperity and mobility in Tower Hamlets.  The six strategic objectives are: SO1 – A part of the Central London Economy: positioning Tower Hamlets as the borough to do business SO2 – New business : supporting enterprise start-ups and growth SO3 – Spreading the benefits of growth: developing a partnership with and between big businesses SO4 – A changing economy: growing emerging sectors SO5 – A pioneering borough: fostering an entrepreneurial and innovation culture SO6 – A ‘place’ for business: ensuring Tower Hamlets has the right spaces and	The are no specific targets or indicators within the plan	Include SA objective to promote economic growth and enterprise in the borough.  The Local Plan should seek to encourage business growth and enterprise.

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
places to support a diverse, thriving economy		
<b>COMMUNITY FACILITIES</b>		
<b>Idea Store Strategy (2009)</b>		
<p>Strategic Objectives:</p> <ul style="list-style-type: none"> <li>• Improve the quality of core library and information services provided by Idea Stores and Libraries</li> <li>• Improve the quality and scope of core adult learning services</li> <li>• Expand the provision of high quality health information, advice and support in Idea Stores and Libraries</li> <li>• Expand the provision of high quality employment information, advice and support</li> <li>• Improve the provision of high quality, accessible ICT and ILT infrastructure, services, training and support in Idea Stores and Libraries</li> <li>• Strengthen inclusion and accessibility</li> <li>• Co-locate cultural, leisure and other council services where this will increase efficiency, effectiveness and value for money</li> </ul>	<p>To deliver 4 x Anchor Idea Stores plus 2/3 Idea Stores Local providing targeted learning, information, library and advice services in partnership with other LSP agencies.</p> <p>Potential areas for future Idea Stores include Bethnal Green, Bromley by Bow and Crossharbour.</p>	<p>Include SA objective to promote community facilities.</p> <p>The Local Plan should seek to meet the needs for Libraries and Idea Stores identified in the strategy, through policy and site allocations.</p>
<b>Leisure Facilities Strategy 2009 – 2019 (2009)</b>		
<p>Strategic Objectives:</p> <ul style="list-style-type: none"> <li>• Address gaps in provision and provide facilities in areas of low participation</li> <li>• Generate energy and economic efficiencies</li> <li>• Improve the quality and suitability of leisure facilities</li> </ul> <p>The strategy provides an evidence base of current and future need for leisure facilities in the borough.</p>	<p>There are no specific targets or indicators</p>	<p>Include SA objective to promote community facilities.</p> <p>The Local Plan should seek to meet the needs for leisure facilities identified in the strategy, through policy and site allocations.</p>
<b>CLIMATE CHANGE</b>		
<b>Carbon Management Plan 2009 - 2020 (Updated 2013)</b>		

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
This Carbon Management Plan sets out the ambition around becoming a low carbon Council and details its first steps, over an initial three year programme of investment. The council's carbon baseline in year ending April 2008 was 42,853 tCO2 (tonnes CO2) with associated energy costs of £3.4 million	The London Borough of Tower Hamlets will reduce CO2 emissions from Council Operations by 25% reduction by 2012, 40% reduction by 2016, 60% by 2020 (from 2007 levels)	Include SA objective to reduce local carbon use.  The Local Plan should seek to contribute towards the Council's ambition to be a low Carbon Council.
<b>PEOPLE</b>		
<b>Supporting People Strategy 2011 – 2016 (2011)</b>		
Sets out how the Council will support the needs of vulnerable people through housing support services.  Objectives: <ul style="list-style-type: none"><li>• Supporting individuals to live as independently as possible</li><li>• Rebalancing services towards prevention and early intervention away from high cost less empowering longer term services;</li><li>• Expanding our commitment to personalised services; and</li><li>• Driving up efficiency and effectiveness in the use of resources</li></ul>	There are no specific targets or indicators	Include SA Objective on meeting varied housing needs, including of vulnerable people.  The Local Plan should contribute towards meeting the needs of vulnerable people, as identified in this strategy.
<b>Children and Families Plan 2012 – 2015 (2012)</b>		
The Children and Families Plan sets a framework through which the council and key partners will work together to improve outcomes for children and families.  Key themes are: <ul style="list-style-type: none"><li>• Early help and responsive universal services: Working effectively together to identify needs early, at all ages, and put coordinated action plans in place to improve outcomes is an overarching principle of the new plan</li></ul>	There are no specific targets or indicators	Include SA Objectives about meeting the health, education, housing, community facilities, open space and other needs of children and families, as identified in this plan.  The Local Plan should take into account

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
<ul style="list-style-type: none"> <li>Prevention from harm: Safeguarding all children across all partner agencies remains a top priority</li> <li>Supporting positive family and wider social relationships: Improving pathways into parental engagement in order to support all parents/carers to achieve positive parenting becomes a key priority</li> <li>Promoting positive health and wellbeing: Keeping children healthy and responding effectively to health needs remains a priority, with a focus on emotional wellbeing and mental health</li> <li>Managing effective transition between services: We will focus on working in a coordinated way across services to support children and young people as they begin in a new school or enter further education or employment, and when they move from a specialist service into a targeted or universal service or from children's services into adult services.</li> </ul>		the needs of young people and families, as identified in this plan.
<b>Planning for School Places 2015 (Updated Annually)</b>		
Provides the annual review of school places.	<p><b>Primary Schools</b> It is projected that there will be 625 more Reception aged pupils in 2024/25 than in 2014/15. This means in addition to plans for extra capacity already agreed there will be a need for 7FE of more primary capacity in the period.</p> <p><b>Secondary Schools</b> It is projected that there will be 856 more 11 year olds in 2024/25 than in 2014/15. This means there will be a need for 20FE of more</p>	Include SA objective to meet the need for sufficient school places.  The Local plan should meet the needs identified in the strategy, through policy and site allocations.

<b>Summary and Objectives</b>	<b>Key Targets and Indicators</b>	<b>Implications for the Sustainability Appraisal (SA) and Local Plan (LP)</b>
	secondary capacity, with 7FE needed by 2021/22.	



## Appendix F SA Framework



## Appendix F: SA Framework

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	Will the Strategy / Policy.... <ul style="list-style-type: none"><li>• Reduce poverty and social exclusion?</li><li>• Promote social cohesion and integration?</li><li>• Promote equity between population groups?</li><li>• Reduce fuel poverty?</li></ul>	<ul style="list-style-type: none"><li>• Improve the borough's relative ranking for indices of multiple deprivations (IMD).</li><li>• Reduce the percentage of children living in income deprived households.</li><li>• Reduce the percentage of older persons (aged 65 and over) living in income deprived households.</li><li>• Reduce the number of households in fuel poverty.</li><li>• Increase the percentage of residents who feel that people from different backgrounds get along.</li></ul>	<p>++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.</p> <p>+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.</p> <p>0 Site is within 50% least deprived LSOAs in the Borough</p> <p>- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)</p> <p>-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)</p> <p>? Effects on deprived LSOAs uncertain.</p>		
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	Will the Strategy/Policy... <ul style="list-style-type: none"><li>• Improve access for all residents to services, facilities and amenities near their home? Such as schools, early years provision, council services, libraries and idea stores, community and faith facilities, leisure centres, open space and play areas and neighbourhood shops</li><li>• Ensure appropriate infrastructure is delivered alongside</li></ul>	<ul style="list-style-type: none"><li>• Increase the number of school places including places for child care and early education, in line with pupil place projections.</li><li>• Provide increases in infrastructure in line with the Leisure Strategy, Idea Store Strategy and Open Space Strategy.</li><li>• Increase the number and quality of play spaces</li><li>• Improve the number of residents who consider</li></ul>	<p>++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.</p> <p>+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be</p>		

<b>Site name:</b>					
<b>Site area:</b>					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	<p>development, including transport and utilities.</p> <ul style="list-style-type: none"> <li>• Promote high quality public realm?</li> <li>• Reduce the impacts of noise, vibration and pollution on public realm?</li> <li>• Reduce opportunities to commit crime and anti-social behaviour?</li> <li>• Improve perceptions of safety and reduce the fear of crime?</li> </ul>	<p>Tower Hamlets a good place to live.</p> <ul style="list-style-type: none"> <li>• Reduce rate of noise complaints</li> <li>• Reduce crowding on rail services</li> <li>• reduce 'excess wait time' on buses</li> <li>• reduce traffic delay</li> <li>• Reduce the crime rates per 1,000 people.</li> <li>• Reduce in the proportion of people who perceive crime as a top personal concern</li> </ul>	<p>accounted for under SA Objective 3 and schools under Objective 6.</p> <p>0 Housing or employment with no new facilities provided.</p> <p>- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)</p> <p>-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)</p> <p>? Uncertain if facilities will be provided.</p>		
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>• Protect and enhance access to an adequate level of provision of health / leisure / community/ open space facilities?</li> <li>• Improve mental and physical health and wellbeing?</li> </ul>	<ul style="list-style-type: none"> <li>• Increase healthy life expectancy.</li> <li>• Increase proportion of children who achieve a good standard of development</li> </ul>	<p>++ Site includes provision of a new health facility that will serve the wider community.</p> <p>+ Site safeguards an existing health facility.</p>		

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	<ul style="list-style-type: none"> <li>• Reduce proliferation of activities with negative health externalities?</li> <li>• Reduce health inequalities?</li> </ul>	<ul style="list-style-type: none"> <li>• Increase participation rates in sport and recreation.</li> <li>• Reduce levels of excess weight among children and adults.</li> <li>• Reduce the number of excess winter deaths</li> <li>• Increase levels of social inclusion (proxy measure: % of adult carers who have as much social contact as they would like).</li> <li>• Reduce the number of people who experience common mental health disorders</li> </ul>	0 No new health facilities proposed on site  - Not used (on basis that proposed development site would not lead to net loss of community facilities)  -- Not used (on basis that proposed development site would not lead to net loss of community facilities)  ? Effects on health facilities are uncertain.		
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	Will the Strategy /Policy... <ul style="list-style-type: none"> <li>• Increase access to good housing?</li> <li>• Meet good housing design standards, including for energy and heat efficiency?</li> <li>• Increase mix of housing types and sizes?</li> <li>• Create opportunities for providing specialist and supported housing</li> <li>• Protect or increase levels of affordable housing?</li> </ul>	<ul style="list-style-type: none"> <li>• Provide 39, 314 additional units in LBTH by 2035 (GLA SMHA, 2013)</li> <li>• Contribute to meeting the need for affordable and family housing, as identified in the latest Strategic Housing Assessment.</li> <li>• All new housing developments to meet EU target of near zero energy buildings by 2020</li> <li>• Reduce rate of statutory overcrowding</li> </ul>	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).  + Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).  0 No housing provided e.g. employment led scheme.  - Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).  - Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).  ? Impact on housing is uncertain.		

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	Will the Strategy/Policy... <ul style="list-style-type: none"><li>• Improve connectivity both within the borough and to neighbouring boroughs and wider London?</li><li>• Encourage a shift to more sustainable forms of travel and away from private vehicle use?</li><li>• Link new development with sustainable transport provision?</li><li>• Increase transport efficiency?</li><li>• Improve safety of the transport network?</li><li>• Improve accessibility of the transport network?</li><li>• Enhance capacity of the transport network?</li></ul>	<ul style="list-style-type: none"><li>• Increase cycling network and support to increase share of all trips made by bicycle.</li><li>• Enhance mode split in favour of active transport, and secondly public transport.</li><li>• Meet Mayor of London's Transport Plan targets for mode split.</li><li>• Reduction in the vehicle (miles / km) travelled per person per year?</li><li>• Mode Share Increase the percentage of journeys made by means other than the car.</li><li>• Reduce the percentage of Principal Road Network where maintenance should be considered.</li><li>• Reduce the number of persons killed and seriously injured on roads within the borough.</li><li>• Reduce the total number of casualties from road traffic accidents within the borough.</li><li>• Reduce CO2 emissions from ground based transport.</li><li>• Reduce crowding on rail services</li><li>• reduce 'excess wait time' on buses</li><li>• reduce traffic delay</li></ul>	<p>++ Site lies within PTAL 5 or 6a/b</p> <p>+ Site lies within PTAL 3 or 4</p> <p>0 – not used</p> <p>- Site lies within PTAL 2</p> <p>-- Site lies within PTAL 1a or b</p> <p>? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.</p>		

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>• Improve opportunities and facilities for formal, informal and vocational learning for all ages?</li> <li>• Support the Local Authority to fulfil its statutory duties for provision of school places and childcare places?</li> <li>• Contribute to upskilling and meeting the skills gap?</li> </ul>	<ul style="list-style-type: none"> <li>• Increase the number of school places, in line with pupil place projections.</li> <li>• Increase the number of early education and childcare places in line with population projections</li> <li>• Reduce the proportion of 16-18 years olds not in education, employment or training.</li> <li>• Increase the proportion of residents who attain an NVQ Level Four or higher.</li> <li>• Reduce current deprivation score for education and skills.</li> <li>• Reduce the proportion of residents with no qualifications.</li> </ul>	++ Site includes provision of a new school that will meet wider needs.  + Site safeguards/expands an existing school on site.  0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.  - Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away  - Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.  ? Impacts on education facilities are uncertain.		
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>• Improve access to employment, especially for local people?</li> <li>• Tackle barriers to employment, such as affordable childcare and skill levels?</li> </ul>	<ul style="list-style-type: none"> <li>• Increase proportion of residents who are employed.</li> <li>• Reduce worklessness amongst high priority groups</li> </ul>	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.  + Site includes provision for employment related development.  0 Housing led scheme on land not in existing employment use.		

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	<ul style="list-style-type: none"> <li>• Improve access to employment for those groups currently experiencing above average worklessness, including BME women.</li> </ul>	<ul style="list-style-type: none"> <li>• Increase number of jobs available to borough residents.</li> <li>• Reduce the employment rate gap between Tower Hamlets and London</li> <li>• Increase the median wage of residents</li> </ul>	<p>- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).</p> <p>-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).</p> <p>? Impact on existing employment is uncertain.</p>		
8. <b>Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>• Improve the resilience of local businesses and local economy?</li> <li>• Support a range of business types and sizes?</li> <li>• Stimulate regeneration and support employment opportunities for the borough's residents, particularly those in deprived areas?</li> <li>• Provide the infrastructure and workspace required for new and existing businesses?</li> </ul>	<ul style="list-style-type: none"> <li>• Retain office and employment space.</li> <li>• Measure business use conversion to other uses.</li> <li>• Increase number and range of businesses operating in the borough</li> </ul>	<p>++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).</p> <p>+ Site would provide employment in a Local Office Location (LOL).</p> <p>0 Site does not provide employment and does not impact on existing employment areas.</p> <p>- Development would result in the loss of employment in a LOL</p> <p>-- Development would result in the loss of employment in the City Fringe, a SIL or POL.</p> <p>? Impact on SIL, POL and LOL is uncertain.</p>		
9. <b>Town Centres:</b> Promote diverse and economically thriving town centres.	<ul style="list-style-type: none"> <li>• Support the vitality of diverse town centres that serves the needs and wellbeing of residents?</li> <li>• Promote the correct locations for different town centre designations, which take into account future growth scenarios?</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce the town centre retail unit vacancy rates.</li> </ul>	<p>++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).</p> <p>+ Site of less than 5ha within a town centre that includes main town centre uses.</p> <p>0 Site outside of a town centre and other criteria do not apply.</p>		

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
			<p>- Site of less than 5ha outside of either a town centre or edge of centre<sup>1</sup> that includes main town centre uses.<sup>2</sup></p> <p>-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses</p> <p>? Uncertain if site will include town centre uses.</p>		
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>• Protect sites, features and areas of historical, archaeological and cultural value and their setting?</li> <li>• Conserve townscape and neighbourhood character?</li> <li>• Promote high quality architecture and design?</li> <li>• Promote location sensitive density and design?</li> <li>• Protect valued local views?</li> <li>• Protect and enhance cultural assets and spaces for cultural activities?</li> </ul>	<ul style="list-style-type: none"> <li>• Achieve a reduction in the number of entries on the Heritage at Risk register.</li> <li>• Protect historic buildings, including listed buildings, buildings on the local list and areas and buildings in the conservation strategy.</li> </ul>	<p>++ Potential for a Listed Building to be brought back into beneficial use.</p> <p>+ Potential for a locally listed building to be brought back into use.</p> <p>0 Used if none of the other criteria apply.</p> <p>- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view</p>		

<sup>1</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>2</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<b>Site name:</b> <b>Site area:</b>					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	<ul style="list-style-type: none"> <li>Help achieve a planned and aesthetically balanced skyline as seen in protected views</li> </ul>		-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone. ? Score uncertain if site is within 400m of a Conservation area or designated site.		
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>Contributes to meeting the increasing need for open space?</li> <li>Link existing open spaces?</li> <li>Provide open space in areas of scarcity?</li> <li>Improve the quality of open space?</li> <li>Protect or improve public accessibility of open space now and in the future?</li> </ul>	<ul style="list-style-type: none"> <li>Increase the number of eligible open spaces managed to Green Flag standards.</li> <li>Increase the amount of all types of public open space (green, hard, play, sports etc)</li> </ul>	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space. + Site includes open space provision but only sufficient to meet the needs of the development. 0 Site or associated use does not generate a need for open space. - Development would result in the loss of open space but partial compensatory land is provided elsewhere. -- Development would result in the loss of open space and compensatory land is not provided elsewhere. ? Impact on open space provision is uncertain.		
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>Support the delivery of developments with a reduced need for energy?</li> <li>Reduce emission of greenhouse gases?</li> </ul>	<ul style="list-style-type: none"> <li>Reduce energy consumption across all sectors, including consumption of domestic electricity.</li> </ul>	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.		

<b>Site name:</b>					
<b>Site area:</b>					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	<ul style="list-style-type: none"> <li>• Increase the proportion of energy generated from renewable sources?</li> <li>• Increase the number of district energy systems (combined heat and power)?</li> <li>• Reduce fuel poverty?</li> <li>• Reduce impact of climate change, including flooding and urban heat island effect?</li> <li>• Ensure new and retrofitted development and infrastructure location and design is future proofed against the future impact of climate change?</li> <li>• Promote construction?</li> <li>• Deliver development in accessible locations and robust transport infrastructure?</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce carbon emissions.</li> <li>• Reduce energy consumption across all sectors, including consumption of domestic electricity.</li> <li>• Reduce carbon emissions.</li> <li>• Support EU target for near zero energy buildings for 2020</li> <li>• Support GLA target for delivery of district energy systems.</li> <li>• Support national target of reducing carbon emissions by at least 80% by 2050.</li> <li>• Support London's CO2 emissions reduction target of 60% of 1990 levels by 2025</li> <li>• Improvements in the energy efficiency ratings for buildings (residential and non-residential)</li> <li>• Ensure that a significant proportion of the energy supply of new development is gained on-site and from a renewable source and/or from a decentralised, renewable or low-carbon, source</li> </ul>	<p>+ Not used – see above.</p> <p>0 Score all sites as neutral.</p> <p>- Not used – see above.</p> <p>-- Not used – see above.</p> <p>? Not used – see above.</p>		

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>• Conserve and enhance diverse and varied habitats?</li> <li>• Improve connectivity between wildlife sites?</li> <li>• Integrate further biodiversity provision within new developments?</li> <li>• Protect and enhance local nature conservation designations and/or protected species?</li> <li>• Improve people's access to nature?</li> </ul>	<ul style="list-style-type: none"> <li>• Increase wildlife habitats</li> <li>• Protect European, national and locally designated sites</li> </ul>	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		
			+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		
			0 if criteria identified for other scores do not apply.		
			- Site is within 100m of a locally designated site Or Protected species likely to be on site.		
			-- Site is within 500m of a nationally/internationally designated site.		
			? Impact on biodiversity is uncertain		
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>• Improve water quality, reduce piped water use and reduce waste water?</li> <li>• Minimise the production of waste across all sectors and increase reuse, recycling, remanufacturing and recovery rates?</li> <li>• Make appropriate provision for waste management facilities to meet the London Plan apportionment target?</li> <li>• Maintain or improve soil quality?</li> <li>• Promote development on brownfield sites?</li> <li>• Help protect residents from existing poor air quality?</li> </ul>	<ul style="list-style-type: none"> <li>• Improve the biological river quality</li> <li>• Minimise waste and increase rates of reuse and recycling in line with DEFRA and EU standards</li> <li>• Reduce residual household waste per a household</li> <li>• Increase waste sent for refuse, recycling or composting</li> <li>• Make improvements to air quality in line with UK Air Quality Strategy requirements.</li> <li>• Reduce the number of air quality hotspots.</li> </ul>	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		
			+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		
			0 No effect.		
			- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).		

<b>Site name:</b>					
<b>Site area:</b>					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	<ul style="list-style-type: none"> <li>• Reduce emissions of Nitrogen Dioxide/Particulate matter PM10?</li> <li>• Contribute towards achieving national and international standards for air quality?</li> </ul>		<p>-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).</p> <p>? Impact is uncertain.</p>		
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>• Minimise the risk of all types of flooding to people and property?</li> <li>• Promote the use of sustainable urban drainage systems.</li> <li>• Ensure developers reduce Surface Water Runoff Rates (with stricter requirements in Critical Drainage Areas?)</li> <li>• Incorporate the EA TE2100 PLAN?</li> </ul>	<ul style="list-style-type: none"> <li>• Not grant planning permission when contrary to Environment Agency advice on flooding and water quality grounds</li> <li>• Increase the number of sustainable urban drainage systems in the borough</li> <li>• All Developments Reduce surface water runoff in line with London Plan</li> <li>• Safe guard corridors of land along existing defence walls.</li> <li>• Improve the Riverside and flood defences.</li> </ul>	<p>++ Site is wholly within flood zone 1</p> <p>+ Majority of site is within flood zone 1, with remainder in flood zone 2</p> <p>0 not used</p> <p>- Majority of site is within flood zone 2, with remainder in flood zone 1</p> <p>--Site is partially or wholly within flood zone 3 a or 3b</p> <p>? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.</p>		
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<ul style="list-style-type: none"> <li>• Maintain or improve soil quality?</li> <li>• Ensure mitigation of adverse effects of contaminated land on human health?</li> <li>• Promote development on brownfield sites?</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce the amount of contaminated soil</li> </ul>	<p>++ Site involves the re-use of previously developed land and buildings (5ha or more).</p> <p>+ Site involves the re-use of previously developed land and buildings (less than 5ha).</p> <p>0 – Site safeguarded for existing use.</p>		

<b>Site name:</b>					
<b>Site area:</b>					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
			- Site involves the loss of previously undeveloped land (less than 5ha).		
			-- Site involves the loss of previously undeveloped land (5ha or more).		
			? status of land is uncertain.		



## Appendix G

### HIA (HUDU Checklist)



## **Appendix G: HIA (HUDU Checklist)**

### **HUDU Rapid Health Impact Assessment Matrix – 3rd Edition 2017**

The assessment matrix is designed to rapidly assess the likely health impacts of development plans and proposals, including planning frameworks and masterplans for large areas, regeneration and estate renewal programmes and outline and detailed planning applications. It should be used prospectively at the earliest possible stage during plan preparation, or prior to the submission of a planning application to inform the design, layout and composition of a development proposal.

The matrix does not identify all issues related to health and wellbeing, but focuses on the built environment and issues directly or indirectly influenced by planning decisions. It is generic and should be localised for specific use. Not all the issues or assessment criteria may be relevant and the user is encouraged to prioritise specific actions which focus on key impacts.

The assessment matrix identifies eleven topics or broad determinants. Under each topic, Section 2 of the tool identifies examples of planning issues which are likely to influence health and wellbeing and the section also provides supporting information and references.

Health impacts may be short-term or temporary, related to construction or longer-term, related to the operation and maintenance of a development and may particularly affect vulnerable or priority groups of the population. Where an impact is identified, actions should be recommended to mitigate a negative impact or enhance or secure a positive impact.

Name of assessor / organisation: **Sean Nicholson / Amec Foster Wheeler**

Name of project (plan or proposal): **Integrated Impact Assessment for London Borough of Tower Hamlets ‘Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Consultation Draft Local Plan (Regulation 19)**

Planning reference (if applicable):

Location of project: **Borough wide**

Date of assessment: **August 2017**

## 1 Housing quality and design

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The Government introduced a new approach for the setting of technical standards for new housing (Ministerial Statement, 25th March 2015). This means that local authorities only have the option of to set additional technical standards for housing in relation to access and water.</p> <p>The Lifetime Homes standard is a voluntary set of 16 design criteria that provide a model for building accessible and adaptable homes.</p> <p>Building Regulation Requirement M4 (2) relates to accessible and adaptable dwellings, M4 (3) relates to wheelchair user dwellings. National Planning Practice Guidance (Reference ID 560007-20150327) states that it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4 (2) and / or M4 (3) based on their housing needs assessment and other available datasets.</p> <p>The Mayor of London has also produced a set of housing standards, including minimum dimensions for rooms, which also encourage building accessible and adaptable homes. The standards also reference the Mayor's Housing Design Guide and Housing Supplementary</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	None identified.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
		<p>Planning Guidance.</p> <p>The following policies in the Draft Local Plan are relevant:</p> <ul style="list-style-type: none"> <li>• Policy D.H3 'Housing standards and quality' – which includes a requirement for 10% wheelchair accessible units across all tenures, consistent with London Plan Policy 3.8 B d).</li> <li>• Policy D.H4 relates to the protection and provision of specialist housing</li> <li>• Policy S.H1 'Meeting housing needs' encourages the use of The Home Quality Mark, which is more comprehensive in scope than the Lifetime Home Standards.</li> </ul>		
Does the proposal address the housing needs of older people, ie extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>See comments above in relation to the Lifetime Homes standard.</p> <ul style="list-style-type: none"> <li>• Policy D.H3 'Housing standards and quality' – which includes a requirement for 10% wheelchair accessible units across all tenures, consistent with London Plan Policy 3.8 B d).</li> <li>• Policy D.H4 relates to the protection and provision of specialist housing.</li> </ul>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>
Does the proposal include homes that can be adapted to support independent living for older and disabled people?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>See comments above in relation to the Home Quality Mark.</p> <p>Policy D.H3 'Housing standards and quality' – which includes a requirement for 10% wheelchair accessible units across all tenures, consistent with London Plan Policy 3.8 B d).</p> <p>The Borough Council is preparing an Older People's Strategy that may provide additional evidence.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal promote good design through layout and orientation, meeting internal space standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy D.H3 'Housing standards and quality' has a provision relating to space standards and cross references the London Plan, which includes space standards at Table 3.3. This approach accords with Policy 3.5 of the London Plan 'Quality and Design of Housing Developments' and the Mayor's Housing Supplementary Planning Guidance.</p> <p>Policy D.DH8 'Amenity' includes criteria relating to daylight and sunlight.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Spatial Policy S.H1 'Meeting housing needs' sets out requirements in relation to the provision of affordable housing.</p> <p>Policy D.H2 'Affordable housing' seeks to secure a range of housing, including affordable housing.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal contain homes that are highly energy efficient (eg a high SAP rating)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The Ministerial Statement discussed above (25th March 2015) restricts the ability of the Council to require energy efficient homes, however London Plan Policy 5.2B sets a 'zero carbon' target for residential development. The target stays in place despite the Government's Written Ministerial Statement. Policy D.ES7 'A zero carbon borough' sets out requirements in relation to the achievement of homes with a high SAP rating in accordance with London Plan Policy 2.5B and the Mayor's Housing Supplementary Planning Guidance.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

## 2 Access to healthcare services and other social infrastructure

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal retain or re-provide existing social infrastructure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy S.CF1 'Supporting community facilities' and Policy D.CF2 ' Existing community facilities' seek to retain facilities, re-provide them and also secure new facilities. Section 5 of the Draft Local Plan relates to place-making and allocates strategic sites that include specific proposals for social infrastructure.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	<p>No mitigation or enhancement identified.</p>
Does the proposal assess the impact on healthcare services?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The London Borough of Tower Hamlets has developed a growth model for understanding and monitoring population change and growth to plan for the timely and adequate provision of infrastructure and services for local people. London Borough of Tower Hamlets works closely with the local NHS to ensure future planning is based on both population projections and predicted changes to service delivery models. This is then reflected in the Infrastructure Delivery Plan. Policies S.CF1 and D.CF3 set out the preferred approach to the provision of future health facilities. Strategic sites include requirements for specific health facilities and the Infrastructure Delivery Plan will set out overall requirements.</p> <p>The Local Plan identifies the proposed growth in housing to 2031 and its broad distribution within the Borough, providing a basis for the planning of future health facilities in the area.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	<p>Updated assessment of impact on health care services in line with growth model and updated population and anticipated distribution of development as the dwelling requirement to 2031 has now been established.</p>

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policies S.CF1 and D.CF3 set out the preferred approach to the provision of future health facilities.</p> <p>Strategic sites include the provision / re-provision/enhancement of healthcare facilities. The relevant NHS Trusts and healthcare providers will be further consulted as these proposals progress to ensure that their requirements are met.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal assess the capacity, location and accessibility of other social infrastructure, eg schools, social care and community facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The London Borough of Tower Hamlets has developed a growth model for understanding and monitoring population change and growth to plan for the timely and adequate provision of infrastructure and services for local people.</p> <p>Policy S.CF1 'Supporting community facilities' and Policy D.CF2 'Existing community facilities' seek to ensure that new development retains facilities, re-provide them and also secures new facilities where existing capacity will be insufficient to accommodate growth. Section 4 of the Draft Local Plan relating to place-making also allocates strategic sites that include specific proposals for social infrastructure.</p> <p>Policy D.CF3 sets out detailed criteria for the future provision of schools.</p> <p>The scale and location of housing growth up to 2031 has been broadly established, providing the basis for planning health infrastructure in the Borough.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	Updated assessment of impact on community facilities in line with growth model and updated population and anticipated distribution of development as the dwelling requirement to 2031 has now been established.

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>
Does the proposal explore opportunities for shared community use and co-location of services?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Encouraging shared facilities is referenced in Key Objective 1. Policy S.CF1 'Supporting community facilities' also identifies the opportunity to provide multi-use facilities.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	A previous recommendation was that the Local Plan should consider including reference to shared community use/co-location in what is now Policy S.CF1 and the Regulation 19 Draft Local Plan incorporates this recommendation.
Does the proposal contribute to meeting primary, secondary and post 19 education needs?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The London Borough of Tower Hamlets has developed a growth model for understanding and monitoring population change and growth to plan for the timely and adequate provision of infrastructure and services for local people. Policies S.CF1, D.CF2 and D.CF3 set out the context for the future provision of new and expanded schools.</p> <p>Section 4 of the Draft Local Plan relating to place-making also allocates strategic sites that include specific proposals for social infrastructure, including primary and secondary schools.</p> <p>The scale and location of housing growth up to 2031 has been broadly established over the plan period, providing the basis for planning health infrastructure in the borough.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	Updated assessment of impact on community facilities in line with growth model and updated population and anticipated distribution of development as the dwelling requirement to 2031 has now been established.

### 3 Access to open space and nature

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal retain and enhance existing open and natural spaces?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy S.OWS1 'Creating a network of open spaces' and D.OWS3 'Open space and green grid network' accord with this criteria. Section 4 of the Draft Local Plan relates to place-making and includes specific proposals for open space provision associated with strategic sites.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	Updated assessment of impact on open space in line with growth model and updated population and anticipated distribution of development as the dwelling requirement to 2031 has now been established.
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The London Borough of Tower Hamlets has developed a growth model for understanding and monitoring population change and growth to plan for the timely and adequate provision of infrastructure and services for local people.  Policy S.OWS1 'Creating a network of open spaces' and D.OWS3 'Open space and green grid network' accord with this criteria. Section 4 of the Draft Local Plan relates to place-making includes specific proposals for open space provision associated with strategic sites.  The scale and location of housing growth up to 2031 has been established, providing the basis for open space requirements to be addressed.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	Updated assessment of impact on open space in line with growth model and updated population and anticipated distribution of development as the dwelling requirement to 2031 has now been established.  The Green Grid is itself a mitigation for the difficulty in providing new open space in a densely populated area such as Tower Hamlets.
Does the proposal provide a range of play spaces for children and young people?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy S.OWS1 seeks to create multi-functional spaces that could potentially contribute to this criterion.  Policy D.H3 'Housing standards and quality'	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>
		includes a criteria on the provision of play space for children. Policy D.OWS3 'Open space and green grid network' also identifies the need for development to provide on-site communal amenity space and child play space.		
Does the proposal provide links between open and natural spaces and the public realm?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy S.OWS1 'Creating a network of open spaces' seeks to improve the quality, value and accessibility of open spaces in line with the Council's Green Grid Strategy  Policy D.DH2 'Attractive streets, spaces and public realm' seeks to ensure that links are provided between open spaces and the public realm.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Are the open and natural spaces welcoming and safe and accessible for all?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy S.OWS1 highlights the need to provide spaces that are suitable for a range of users, are of a high quality and are well connected and are therefore safe and welcoming.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal set out how new open space will be managed and maintained?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The Council's Community Infrastructure Levy (CIL) Regulation 123 List (April 2015) includes public open space as a type of infrastructure that will be, or may be, funded wholly or in part through CIL, this includes management and maintenance.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

## 4 Air quality, noise and neighbourhood amenity

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy D.SG4 'Construction of new development' sets out a range of measures to mitigate impacts associated with construction.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified in terms of policy. It will be important for project level environmental assessments to consider the potential for cumulative effects associated with the construction phase.
Does the proposal minimise air pollution caused by traffic and energy facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy D.ES2 'Air quality' sets out the requirement for development to be air quality neutral, in accordance with the London Plan. Projects where an Air Quality Impact Assessment will be required are also identified.</p> <p>Policy D.TR3 'Parking and permit-free' requires permit free parking in areas with good public transport accessibility and / or areas of existing on-street parking stress.</p> <p>The Council's car parking standards include provision for parking free development.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal minimise noise pollution caused by traffic and commercial uses?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy D.ES9 'Noise and vibration' identifies the need for noise sensitive developments to consider this matter through a noise assessment where appropriate.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

## 5 Accessibility and active travel

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal prioritise and encourage walking (such as through shared spaces?)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy S.TR1 'Sustainable travel' seeks to priorities the needs of pedestrians, cyclists and access to public transport.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	A previous iteration of the HIA suggested that the justification for Policy S.TR1 could reference the Walking Plan for Tower Hamlets (2011-2021). The Council has advised that the Walking Plan is out of date.
Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Spatial Policy S.TR1 'Sustainable travel' seeks to priorities the needs of pedestrians, cyclists and access to public transport.</p> <p>D.TR3 'Parking and permit Free' includes a requirement for cycle parking and cycle hire scheme docking stations.</p> <p>Policy 6.9 of the London Plan requires the provision of shower facilities and on-site changing so it would not be appropriate for the Local Plan to duplicate this.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	A previous iteration of the HIA suggested that the justification for Policy S.TR1 could reference the Cycling Plan for Tower Hamlets (2009). The Plan now references a more up to date version of that Plan published in January 2016.
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy S.TR1 'Sustainable travel' seeks to priorities the needs of pedestrians, cyclists and access to public transport.</p> <p>Policy D.DH2 'Attractive streets, spaces and public realm' also seeks to improve permeability and legibility of streets.</p> <p>Section 4 of the Draft Local Plan on place-making</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>
		includes proposals for strategic sites and the need to improve connectivity to existing local and strategic pedestrian and cycling routes is highlighted for relevant sites.		
Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy D.DH2 'Attractive streets, spaces and public realm' identifies the need to create a street hierarchy that puts pedestrians and cyclists first. The policy also includes specific criteria relating to the safety of pedestrians and other users of roads and streets.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Is the proposal well connected to public transport, local services and facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Key Objective 1 of the Plan 'Managing the growth and shaping change' is that growth must be supported by social and transport infrastructure. Key Objective 2 'Sharing the benefits of growth' seeks to ensure that growth must help reduce existing inequalities. These objectives are reflected in more detailed policies that are relevant this criteria including:</p> <ul style="list-style-type: none"> <li>• Policy D.DH2 Attractive streets, spaces and public realm' identifies the need to improve permeability and legibility to public transport, town centres and facilities.</li> <li>• Policy S.TR1 'Sustainable travel' seeks to priorities the needs of pedestrians, cyclists and access to public transport.</li> </ul> <p>Chapter 5 on place-making identifies specific requirements for facilities at strategic sites.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy D.TR3 'Parking and permit-free' seeks to reduce car parking provision in areas that are well served by public transport and provision for car clubs and pool car schemes.</p> <p>The Council's car parking standards include provision for parking free development.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal allow people with mobility problems or a disability to access buildings and places?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>This criterion is reflected in a number of policies:</p> <ul style="list-style-type: none"> <li>• Policy S.DH1 'Delivering high quality design' seeks to ensure that developments are designed to be adaptable to different uses and the changing needs of users.</li> <li>• Policy D.DH2 'Attractive streets, spaces and public realm' identifies the need to improve permeability and legibility to public transport, town centres and facilities.</li> <li>• Policy D.H3 'Housing standards and quality' requires that 10% of new homes are designed to be suitable for occupation by a wheelchair user.</li> </ul>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

## 6 Crime reduction and community safety

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal incorporate elements to help design out crime?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy D.DH2 'Attractive streets, spaces and public realm' requires development to improve safety and perception of safety to pedestrians including elements to design out crime and fear of crime and improving the public realm to enable interchange between different transport modes.</p> <p>London Plan Policy 7.3 Designing out Crime requires development proposals to take account of the principles set out in national guidance and Secured by Design (Association of Chief Police officers. Secured by Design, New Homes 2010).</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Gated communities would be contrary to Local Plan Policy D.DH2 'Attractive streets, spaces and public realm' which seeks to resist gated communities.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal include attractive, multi-use public spaces and buildings?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy S.DH1 'Delivering high quality design' requires proposals to be adaptable to different uses and the changing needs of users.</p> <p>Policy S.CF1 'Supporting community facilities' supports multi- use community facilities.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Has engagement and consultation been carried out with the local community?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The Council has already consulted on an Issues and Options style paper in December 2015-early 2016. The Regulation 18 Draft Local Plan (including an earlier iteration of this document) have also been consulted on. The Regulation 19 Draft Local Plan and future versions will be the subject of	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>
		formal consultation and an Examination by an independent Inspector.		

## 7 Access to healthy food

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal facilitate the supply of local food, ie allotments, community farms and farmers' markets?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy D.OWS.3 encourages the use of land for community allotments, particularly where they bring vacant developable land into use on a temporary basis.</p> <p>Policy D.TC7 'Markets' encourages new markets, including farmers markets.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy S.TC1 'Supporting the network and hierarchy of Town Centres' establishes a hierarchy of centres.</p> <p>Policy D.TC2 'Retail in our town centres' sets out appropriate uses within town centres and sets out criteria against which any loss of A1 units are proposed.</p> <p>Policy D.TC3 'Retail outside our town centres' sets out criteria for the provision of retail units outside of town centres.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy D.TC5 'Food, drink, entertainment and the night-time economy' includes criteria on the location of hot food takeaways and over concentration.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

## 8 Access to work and training

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy S.SG2 'Delivering sustainable growth in Tower Hamlets' identifies the need for proposals to provide local training and employment opportunities during construction and operational phases.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal provide childcare facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy S.CF1 'Supporting community facilities' supports such facilities in suitable locations, including early years facilities.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal include managed and affordable workspace for local businesses?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy S.EMP1 'Creating investment and jobs' identifies the need for affordable workspace, including shared workspace.  Policy D.EMP3 'Loss of employment space' seeks to secure replacement space in the event that employment within a Local Employment Location is lost.  Policy D.EMP4 'Redevelopment within the borough's employment areas' requires any industrial floorspace in Local Industrial Locations to be re-provided on site. The need to provide a range of premises to meet the needs of Small and Medium Enterprise is highlighted.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal include opportunities for work for local	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Policy S.SG2 'Delivering sustainable growth in Tower Hamlets' identifies the need for proposals to	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative	No mitigation or enhancement identified.

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact?</b>	<b>Recommended mitigation or enhancement actions</b>
people via local procurement arrangements?	<input type="checkbox"/> N/A	<p>provide local training and employment opportunities during construction and operational phases.</p> <p>The Borough Council has an initiative called 'Workpath'<sup>1</sup> that provides support to local residents looking to enter or re-enter employment.</p>	<input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	

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<sup>1</sup> [http://www.towerhamlets.gov.uk/lgnl/jobs\\_and\\_careers/employment\\_and\\_training\\_initia/Workpath/WorkPath.aspx](http://www.towerhamlets.gov.uk/lgnl/jobs_and_careers/employment_and_training_initia/Workpath/WorkPath.aspx)

## 9 Social cohesion and lifetime neighbourhoods

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal connect with existing communities, ie layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy D.DH2 'Attractive streets, spaces and public realm' meets this criteria. The policy requires developments to create well connected and integrated places and to increase opportunities for social interaction.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal include a mix of uses and a range of community facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policies S.CF1 'Supporting community facilities' supports multi- use community facilities and the protection of existing facilities. Policy D.CF3 'New and enhanced community facilities' will also contribute.</p> <p>Chapter 4 on place-making identifies specific requirements for community facilities at strategic sites.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal provide opportunities for the voluntary and community sectors?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy S.CF1 'Supporting community facilities' will help protect existing facilities and deliver new facilities for these sectors. Policy D.CF3 'New and enhanced community facilities' will also contribute.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal address the six key components of Lifetime Neighbourhoods?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>In response to an ageing society - the Government published research on Lifetime Neighbourhoods in 2011 (Lifetime Neighbourhoods, Department for Communities and Local Government, December 2011). The Guidance appears to be extant. Policy 7.1 of the London Plan and Section 7.5 of the Mayor's Housing Standard also relates to the concept of Lifetime Neighbourhoods. The six key</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
		<p>components referred to in the criterion are identified in the Government guidance as:</p> <ul style="list-style-type: none"> <li>• Empowering residents to develop lifetime neighbourhoods – especially resident empowerment</li> <li>• Access – enabling residents to connect with services and facilities, both physically and virtually;</li> <li>• Services and amenities – a mix of residential, employment and retail uses;</li> <li>• Built and natural environments – environments that promote safe, inclusive access to key services and facilities. Outdoor spaces and buildings that promote social contact. Locally accessible greenspace;</li> <li>• Social networks/well-being – informal/formal opportunities and activities, where people feel safe and confident and which respect the needs of different ages, cultures and ethnicities;</li> <li>• Housing – a range of choices, inclusive design principles and homes designed to meet changing needs.</li> </ul> <p>Although the Draft Local Plan does not use the term 'Lifetime Neighbourhoods' extensively (there are two references in the development principles for the Lower Lea Valley), it is clear from a review of the</p>		

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
		<p>principles that policies in the Draft Local Plan are consistent with the principles. Relevant policies include:</p> <ul style="list-style-type: none"> <li>• Policy S.SG2 'Delivering sustainable growth in Tower Hamlets' is consistent with the principles relating to access, service and amenities, built and natural environments and social networks and housing;</li> <li>• Policy S.TR1 'Sustainable travel' is consistent with the principle relating to access;</li> <li>• Policy S.CF1 'Supporting community facilities' seeks to protect existing community facilities and provide new ones – providing opportunity for social networking and access to services and amenities;</li> <li>• Policy S.H1 'Meeting housing needs' is consistent with the principle relating to housing.</li> </ul>		

## 10 Minimising the use of resources

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal make best use of existing land?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy D.DH7 'Density' seeks to ensure that development makes full use of land but does not give rise to over development. Policy S.DH1 'Delivering high quality design' sets out more detailed criteria on this, e.g. identifying factors to be considered, like scale, height and massing.</p> <p>The Strategic Sites identified by the Council involve the use of previously developed land and buildings.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal encourage recycling (including building materials)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy D.SG4 'Construction of new Development' seeks to ensure that development uses recycled materials, including materials from the development site.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal incorporate sustainable design and construction techniques?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Given the Ministerial Statement of 25<sup>th</sup> March 2015, the Council is limited to what it can require in relation to the use of sustainable design and construction techniques for housing. The Draft Local Plan encourages the use of the Housing Quality Mark but can only do so on a voluntary basis.</p> <p>London Plan Policy 5.3 'Sustainable Design and Construction' requires major development proposals to meet the minimum standards outlined in the Mayor's SPG on Sustainable Design and Construction.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
		<p>Policy D.ES6 'Sustainable water management' requires the use of measures to minimise water consumption. This is consistent with London Plan Policy 5.14. The Mayor's Sustainable Design and Construction SPG provides more information.</p> <p>Policy D.ES7 'A zero carbon borough' requires the use of BREEAM for non-residential development.</p>		

## 11 Climate change

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
Does the proposal incorporate renewable energy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>In accordance with the London Plan, the Draft Local Plan includes policies in relation to a reduction in carbon emissions. This includes on site provision of renewable energy, where feasible.</p> <p>In particular, Policy D.ES7 will help reduce use of non-renewable resources associated with energy generation.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, ie ventilation, shading and landscaping.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy D.ES10 'Overheating' requires that buildings and spaces are designed to avoid over-heating.</p> <p>More detailed guidance on the range of 'passive' and 'active' measures which development can incorporate to avoid homes overheating is set out in the Mayor's Sustainable Design and Construction SPG.</p> <p>Policy D.ES3 'Urban greening and biodiversity' requires the protection of trees and incorporation of trees wherever possible.</p> <p>The Home Quality Mark is referenced in Policy S.H1 'Meeting Housing Need'.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.
Does the proposal maintain or enhance biodiversity?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy S.ES1 'Protecting and enhancing our environment' requires development to contribute to biodiversity enhancement.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
		<p>Policy D.ES3 'Urban greening and biodiversity' requires the provision of living building elements. Major development will be required to submit an Ecology Assessment demonstrating biodiversity enhancement.</p> <p>Policy S.OWS2 'Enhancing the network of water spaces' seeks to enhance the ecological and biodiversity quality of the water network.</p>		
Does the proposal incorporate sustainable urban drainage techniques?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Policy D.ES4 'Flood risk' requires development to incorporate flood resilience and/or resistance measures.</p> <p>Policy D.ES5 'Sustainable drainage' of the Draft Local Plan requires proposals to demonstrate how they will incorporate sustainable drainage techniques and how major developments will manage surface water.</p> <p>Strategic sites will need to reflect the findings of the Level 2 Strategic Flood Risk Assessment (2017) and the sequential test.</p> <p>Policy 5.12 of the London Plan 'Flood Risk Management' and the Mayor's housing supplementary planning guidance also require all development proposals within identified flood risk zones to incorporate flood resilient design.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.



# Appendix H

## EqIA Checklist



## Appendix H: EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<b>Name of 'proposal' and how has it been implemented</b> (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)	Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Consultation Draft Local Plan (Regulation 19)
<b>Directorate / Service</b>	Strategic Planning - Plan Making Team Directorate of Development & Renewal
<b>Lead Officer</b>	Philip Wadsworth
<b>Signed Off By (inc date)</b>	Marissa Ryan-Hernandez (25/08/17)
<b>Summary – to be completed at the end of completing the QA (using Appendix A)</b>	<p> Proceed with implementation</p> <p>This QA updates work undertaken in October 2016 associated with the Regulation 18 Draft Local Plan.</p> <p>Based on the QA, a Full EA is not considered to be necessary at this stage in the process as the Draft Local Plan exhibits due regard to the Council's Public Sector Equality Duty. Rather, steps will be taken to ensure that due regard is embedded in the process to produce and the policies of the Local Plan as it continues to develop.</p> <p>As a result of performing the QA checklist, the content of the Regulation 19 Draft Local Plan does not appear to have any adverse effects on people who share Protected Characteristic and those who do not; aims to foster good relations and establish communities that are free from discrimination. No</p>

	further actions are recommended at this stage. This needs to be kept under review as the Local Plan develops.
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Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
<b>1</b>	<b>Overview of Proposal</b>		
a	Are the outcomes of the proposals clear?	Unsure at this stage in the plan preparation process – the full extent and location of development to 2031 is uncertain as the Local Plan is still in development	<p>The Draft Local Plan sets out the Council's intention to roll forward planning policy to 2031. The Draft Local Plan sets out a suite of policies that are intended to provide the policy context for new development up to 2031 and are centred on a vision for the Borough and two key objectives. The vision acknowledges the Borough's role as the focus for London's growth. The vision states that the Borough will be home to a diverse range of communities, existing communities will be supported and new residents welcomed. The Local Plan references the One Tower Hamlets principles in the supporting text to Spatial Policy S.SG2 'Delivering sustainable growth in Tower Hamlets.'</p> <p>The two key objectives are 1) managing the growth and shaping change and 2) sharing the benefits of growth. Each objective is underpinned by a set of principles. The first objective seeks to ensure that growth contributes to identified social and economic needs, which will include the needs of those who share Protected Characteristics and those who do not. The second objective is supported by the principle that growth must help reduce social, economic and environmental inequalities and promote community cohesion, existing health inequalities must also be reduced.</p> <p>The vision and key objectives are supported by a suite of policies, which include:</p>

<b>Stage</b>	<b>Checklist Area / Question</b>	<b>Yes / No / Unsure</b>	<b>Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)</b>
			<ul style="list-style-type: none"> <li>• Policy S.SG2 'Delivering sustainable growth in Tower Hamlets' which includes the need for the creation of mixed and balanced communities, incorporating inclusive design principles, local training and employment opportunities and infrastructure and public realm improvements that are accessible to all;</li> <li>• Policy S.H1 'Meeting housing needs' sets out requirements in relation to the provision of affordable housing and the regeneration of housing estates. It also safeguards an existing Gypsy and Traveller site;</li> <li>• Policy D.H2 'Affordable housing' which seeks to secure a range of housing;</li> <li>• Policy D.H4 relates to the protection and provision of specialist housing;</li> <li>• Policy D.H5 'Gypsies and travellers accommodation,' is a policy on the future provision of accommodation for the Gypsy and Traveller community;</li> <li>• A range of policies also seek to ensure access to facilities and services, including public transport, health facilities, education and community facilities, e.g. <ul style="list-style-type: none"> <li>○ Policy S.CF1 'Supporting community facilities';</li> <li>○ Policy D.CF2 ' Existing community facilities';</li> <li>○ D.CF3 'New and enhanced community facilities' and</li> <li>○ Policy S.TR1 'Sustainable travel'.</li> </ul> </li> </ul> <p>The Draft Local Plan identifies the quantum of housing required to meet local needs and the strategic sites that can help meet this requirement. A detailed review of Local Plan policies has been undertaken and has not identified</p>

<b>Stage</b>	<b>Checklist Area / Question</b>	<b>Yes / No / Unsure</b>	<b>Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)</b>
			any instances where the content of policies would give rise to adverse effects on people who share Protected Characteristics.
b	Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?	Yes	The Local Plan is a Borough wide document that will potentially impact on all of those who live, work and visit the Borough. Based on a desk top review of the content of the Draft Local Plan and discussion with the Council's Equalities team, no instances have been identified where the content of policies would give rise to a situation where the council was not fulfilling its public sector equality duty.
<b>2</b>	<b>Monitoring / Collecting Evidence / Data and Consultation</b>		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	<p>At this stage only a qualitative assessment of the Draft Local Plan can be undertaken and this has not highlighted any need for further assessment. Judgement has been informed through reference to a contextual baseline, which includes demographic information from the Office for National Statistics (ONS) and reference to the Index of Multiple Deprivation (IMD) produced by DCLG. No adverse effects have been identified based on a detailed review of draft policies but consultation on the document may highlight issues that need to be investigated further through future iterations of this analysis.</p> <p>Consultation responses will be analysed by the Council and any relevant issues highlighted.</p>
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	A range of local, regional and national sources of data have been used to provide a baseline which has been used in the assessment of the Draft Local Plan policies. Subject to the nature of consultation responses received, it is considered that there is sufficient information to inform the

<b>Stage</b>	<b>Checklist Area / Question</b>	<b>Yes / No / Unsure</b>	<b>Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)</b>
			analysis.
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	<p>The Council, working in conjunction with appointed consultants Amec Foster Wheeler, have completed the assessment of the Draft Local Plan. Amec Foster Wheeler were selected following a competitive tendering process and needed to demonstrate relevant skills and experience. Public engagement activities were undertaken at the Regulation 18 stage and the results from this have informed the Regulation 19 version of the Local Plan. The approach to this assessment has been discussed with the Council's Senior Strategy, Policy &amp; Performance Officer (Equality) officer who confirmed that completion of the QA form was sufficient.</p> <p>Public engagement is a mechanism for incorporating public and minority points of view into local policy and plan making. Design of engagement will continue to seek to be as accessible to different groups of people as possible. This includes a range of media types (i.e. print, online, social media), accessible venues, holding events across a range of days and times, and making sure there are no clashes with religious days/periods of significance.</p> <p>There is an internal stakeholder group which serves to coordinate efforts and inputs across council, as part of the Local Plan project.</p> <p>There is an external stakeholder group which engages the Borough's statutory consultees.</p>
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	Consultation has already taken place through an Issues and Options style paper in late 2015/early 2016. There was a further programme of engagement in November –

<b>Stage</b>	<b>Checklist Area / Question</b>	<b>Yes / No / Unsure</b>	<b>Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)</b>
			<p>December 2016 on the Regulation 18 consultation document. There will be further rounds of formal consultation as the Local Plan develops, the next is anticipated to be undertaken in Summer 2017 (Regulation 19 Draft Local Plan). Inclusive design of consultation in accordance with the Statement of Community Involvement has been incorporated into a consultation and engagement strategy and detailed consultation programme.</p> <p>Consultations will be documented as best as possible. Collecting information on stakeholders is undertaken in line with Council policy, e.g. equalities monitoring forms are separate from feedback and are completed on a voluntary basis.</p> <p>A suggestion arising from completion of this questionnaire at the Regulation 18 stage was that the policy team considered consulting with or briefing other groups meeting during the consultation period, e.g. groups identified in the Council's Single Equality Framework, e.g. Community Forums, Local Voices and other relevant local groups if they are meeting during the period over which the document is being consulted on and the Council responded positively to this recommendation and it is understood that additional consultation was undertaken at Regulation 18 Stage. At the Regulation 19 stage, contact will be made with all groups contacted at the Regulation 18 stage.</p>
<b>3</b>	<b>Assessing Impact and Analysis</b>		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	Yes	<p>A review of policies has been undertaken and this has not identified the potential for any adverse effects on local people</p> <p>Officers have discussed the policies with the Council's</p>

<b>Stage</b>	<b>Checklist Area / Question</b>	<b>Yes / No / Unsure</b>	<b>Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)</b>
			Equalities team to make sure that they are appropriately worded.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	Yes	The Draft Local Plan contains two key objectives: 1) managing the growth and shaping change and 2) sharing the benefits of growth. The second objective is supported by the principle that growth must help reduce social, economic and environmental inequalities, and promote community cohesion, demonstrating a clear understanding of the importance of addressing inequalities. The Local Plan is a high level document that sets the framework for future decisions about development. As the Plan progresses, greater weight can be given to its policies. The Council, as the Local Planning Authority, will need to consider potential effects on people who share Protected Characteristics when it approves later versions of the Local Plan and determines future planning applications and makes other decisions relating to future development in the Borough.
<b>4</b>	<b>Mitigation and Improvement Action Plan</b>		
a	Is there an agreed action plan?	Yes	The next stage will involve consultation on the Draft Regulation 19 Local Plan and a review of consultation responses. Officers will work with the Equalities team to review relevant representations and an appropriate response if necessary.
b	Have alternative options been explored	Yes	In developing policies at the Regulation 18 stage, consideration was given to the merits of retaining existing policies from the existing development plan and a number of alternatives in relation to specific policy sections, these are set out in Appendix J of the IIA Report. The options considered are not anticipated to have any implications for people who share Protected Characteristics.

<b>Stage</b>	<b>Checklist Area / Question</b>	<b>Yes / No / Unsure</b>	<b>Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)</b>
<b>5</b>	<b>Quality Assurance and Monitoring</b>		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	The Local Plan will progress through a series of formal stages, including an independent examination and consideration will continue to be given to the potential for adverse effects on the council's equality duty. Following consultation on the Draft Local Plan a regulation 19 Local Plan has been produced and will be consulted on in summer/autumn 2017. Following consultation and consideration of responses, a 'Submission Local Plan' will be produced. This will be submitted to the Government's Planning Inspectorate who will appoint an independent examiner. Following a public examination, the Inspector will issue a report making any recommendations considered necessary to make the plan sound, which the Council must publish. Following consultation on the modified plan, the Council will look to adopt the Local Plan.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics?	Yes	The Local Plan will need to set out proposals for monitoring. There will also be a need to undertake monitoring of the environmental effects of the plan.
<b>6</b>	<b>Reporting Outcomes and Action Plan</b>		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	The Executive Summary is considered to contain sufficient information.

### **(Sample) Equality Assessment Criteria**

<b>Decision</b>	<b>Action</b>	<b>Risk</b>
<p>As a result of performing the QA checklist, it is evident that due regard is not evidenced in the proposal and / or a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. It is recommended that the proposal be suspended until further work or analysis is performed – via a the Full Equality Analysis template</p>	<b>Suspend – Further Work Required</b>	Red 
<p>As a result of performing the QA checklist, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<b>Proceed with implementation</b>	Green: 

## **BASELINE INFORMATION**

### **Introduction**

The resident population of London Borough of Tower Hamlets is estimated to be approximately 254,100 in 2011 according to the census. In respect of the protected characteristics detailed in the Equalities Act 2012, the information below, sourced from 2011 census and GLA's population projections data, provide general information of equality profiles for various groups in the Borough.

### **Population**

The 2011 census showed that Tower Hamlets has had the fastest growing population of any Local Authority in the country over the last 10 years. At 254,100 usual residents, the population has increased by 29% since 2001 (57,990 additional residents).

### **Age**

The main driver of the growth since the 2001 Census has been in the working age population (aged 20 to 64). Residents in the 20 to 64 age group have increased from 122,070 in 2001 to 176,400 in 2011, an increase of over 44.5% (54,330 residents).

### **Race**

More than two thirds (69 per cent) of the borough's population belong to minority ethnic groups (i.e. not White British): 55 per cent belong to BME (Black and Minority Ethnic) groups and a further 14 per cent are from White minority groups. The borough's three largest groups are the Bangladeshi (32 per cent), White British (31 per Cent) and 'Other White' populations. Considered together, people from these three ethnic groups make up around three-quarters of the Tower Hamlets population.

A number of other ethnic groups in the borough, though smaller in population size, have also seen quite fast growth (relative to the overall growth rate for the borough of 30 per cent). The following groups have more than doubled in size: Mixed ethnic groups (+113 per cent); Indian (+126 per cent); Chinese (+127 per cent); Other Asian (+227 per cent) and Black Other (+312 per cent).

## **Religion or Belief**

The Borough's largest faith groups are Muslim and Christian. The 2011 census shows that 34.5 per cent of residents identified themselves as Muslims and 27.1 per cent residents identified themselves as Christian.

There have been significant changes in the faith composition of the population over the last ten years. Most notably, there has been a decline in the number of Christians and an increase in the number of people reporting no religion at all. These trends have been evident both locally and nationally.

## **Disability**

By August 2010, there were more than 10,000 claimants of disability living allowance in Tower Hamlets. 52 per cent were male and 48 per cent were female. Among them, over 7,000 people had claimed disability living allowance for 5 years and over. People between the ages of 25-49 accounted for the highest number of claimants of disability living allowance. Disabled people often face significant employment barriers; only one third population of this group are in employment, this compares against almost two thirds of non-disabled people of the same age profile.

## **Gender Reassignment**

The Council does not have demographic information on gender reassignment. However, this group is taken to be represented in Tower Hamlets population.

## **Gender**

The 2011 Census shows that the population of Tower Hamlets is 51.5 % men and 48.5 % women - a gender ratio of 106 male residents per 100 female residents. There are some significant imbalances in specific age bands – with the greatest imbalance in the 40-44 age range, where it reaches 132 males for every 100 females and is significantly different from London and National averages.

## **Sexual Orientation**

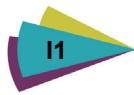
The Council does not have demographic information on sexual orientation. However, this group of people are taken to be represented in Tower Hamlets population.

## **Marriage and Civil Partnerships**

At the time of the 2011 Census, there were more single persons (aged 16 and over) than married/re-married persons living in the Tower Hamlets, which was about 34.6% against 23.7%.

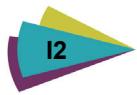
### **Pregnancy and Maternity**

From January to December 2010, the total birth in Tower Hamlets was about 4,600. Over 50 per cent were males and about 48 per cent were females.



## Appendix I

### HRA Screening





London Borough of Tower Hamlets

## Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Regulation 19 Draft Local Plan

Information to support an assessment under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended)

Final Report



September 2017

Amec Foster Wheeler Environment  
& Infrastructure UK Limited



## Report for

Philip Wadsworth  
Strategic Planning – Plan Making Team Leader (Interim)  
Corporate Director of Development & Renewal  
London Borough of Tower Hamlets  
PO Box 55379  
Mulberry Place  
London E14 2BG

## Main contributors

Mike Frost  
Sean Nicholson

## Issued by

*S. Nic*  
QP Mike Frost

## Approved by

*P. D. Davis*  
Peter Davis

## Amec Foster Wheeler

Canon Court  
Abbey Lawn  
Abbey Foregate  
Shrewsbury SY2 5DE  
United Kingdom  
Tel +44 (0) 1743 342 000

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client\reports\draft sa reg 19\june 17 revised following client  
comments\june 17 for issue with track changes  
accepted\appendix i hra draft june 2017 for issue.docx

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## Document revisions

No.	Details	Date
1	Draft for client comment	23/06/17
2	Draft for client v2	30/06/17
3	Draft for Client - CAB	21/08/17
4	Final	01/09/17
5	Final (post CAB)	20/09/17

## Executive summary

The London Borough of Tower Hamlets (LBTH) is currently consulting on a Draft of its new Local Plan. Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the 'Habitats Regulations') states that if a land-use plan "*(a) is likely to have a significant effect on a European site<sup>1</sup> or a European offshore marine site<sup>2</sup> (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site*" then the plan-making authority must "*...make an appropriate assessment of the implications for the site in view of that site's conservation objectives*" before the plan is given effect. The process by which Regulation 102 is met is known as Habitats Regulations Assessment (HRA).

Amec Foster Wheeler has been commissioned by LBTH to assist with the HRA of its Local Plan. This report summarises our assessment of the Regulation 19 Draft Local Plan against the conservation objectives of any European sites that may be affected, and summarises the iterative HRA process that is being undertaken to support the plan development and ensure that it meets the requirements of Regulation 102. The report builds on earlier work undertaken on the Regulation 18 Draft Local Plan and takes account of changes to the Local Plan between these versions.

Regulation 102 essentially provides a test that the final plan must pass; there is no statutory requirement for HRA to be undertaken on draft plans or similar developmental stages (e.g. issues and options; preferred options) and so this report does not provide a formal conclusion to the HRA process. However, it is accepted best-practice for the HRA of strategic planning documents to be run as an iterative process alongside the plan development, and so at the relevant Draft Local Plan stage potential mechanisms by which the Local Plan could affect European sites are identified and (if necessary) measures suggested to ensure significant effects do not occur.

The HRA of the Draft Local Plan uses the principles of 'screening' to allow the assessment stage to focus on those aspects that are most likely to have potentially significant or adverse effects on European sites, as well as shape the emerging plan. Screening is therefore used to 'screen-out' European sites and plan components from further assessment, if it is possible to determine that significant effects are unlikely (e.g. if sites or interest features are clearly not vulnerable (both exposed and sensitive) to the outcomes of a plan due to the absence of any reasonable impact pathways). For the Draft Local Plan, the screening process has been used on the plan 'as a whole'; on the European sites themselves; and on the key components of the plan (the policies and allocations). The screening takes account of measures that are intended for inclusion in the plan to avoid significant effects.

The assessment assessed the potential for the plan to affect five European sites within 15km of the LBTH area: Epping Forest SAC, Richmond Park SAC, Wimbledon Common SAC, Lee Valley SPA and Lee Valley Ramsar. It is considered that the plan is unlikely to have any measurable effects on sites beyond this due to the absence of reasonable impact pathways; with regard to the sites considered, Richmond Park SAC and Wimbledon Common SAC will also be unaffected due to the distances and absence of impact pathways. Natural England confirmed by email on 5<sup>th</sup> of May 2017 that the approach and scope of the HRA as set out in the report that accompanied the Regulation 18 consultation document were acceptable.

Epping Forest SAC, Lee Valley SPA and Lee Valley Ramsar have features that are potentially sensitive to the outcomes of the Local Plan, particularly via visitor pressure or reduced air quality which are aspects that are known to be currently affecting Epping Forest SAC in particular. It is considered that these sites will have only limited exposure to these effects as a result of the plan, although it is appropriate for the plan to

<sup>1</sup> Strictly, 'European sites' are: any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') apply; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Habitats Regulations are applied a matter of UK Government policy when considering development proposals that may affect them. "European site" is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

<sup>2</sup> 'European offshore marine sites' are defined by Regulation 15 of *The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007* (as amended); these regulations cover waters over 12 nautical miles from the coast.

minimise the residual risk through appropriate policy measures designed to minimise the risk of exposure occurring (e.g. air quality assessment requirements or policy controls on locally accessible public space). Therefore, the policy review summarised in Table 4.8 in the main report identifies policies that would benefit from amendments to maximise their effectiveness in reducing residual risk. In particular:

- ▶ Air Quality: Policy 7.14 of the London Plan requires development to be air quality neutral and Policy D.ES2 of the Draft Local Plan also requires this. It was previously recommended that Policy D.ES2 'Air Quality' be used to help ensure that development arising from the LBTH Local Plan plays a full part (with other plans) in reducing diffuse air pollution that may affect Epping Forest SAC. It was suggested that the text of the policy (or supporting text) require that air quality impact assessments consider potential impacts on European sites, particularly Epping Forest SAC and the potential effects through consequent increases in traffic volumes outside the LPA area. The explanatory text to D.ES2 has been amended as suggested; other policy controls and options may be available (NE and the EA will be able to provide further guidance in this regard, particularly as the Epping Forest Council Local Plan is being prepared on a similar timescale to LBTH's Local Plan); and
- ▶ Public Access: It is unlikely that visitor pressure on Epping Forest SAC will increase significantly as a result of the LBTH Local Plan, such that the LBTH Local Plan that need include specific mitigating measures (e.g. SANGS etc.), and existing and planned public space in and near the LBTH area (e.g. The Olympic Park and the Lea River Park) are likely to provide some moderating effects in any case. The policy requirements for LBTH can therefore be more holistic, by ensuring that policies and development controls collectively provide the local recreational amenities (e.g. traffic-free walks / paths; green networks; etc.) that are likely to reduce the incentive to regularly travel to Epping Forest SAC. This is largely achieved, although more emphasis or obligation should be placed on developers to clearly demonstrate how policies S.OWS1, S.OWS2 and D.OWS3 are met as part of their developments in order to demonstrate the avoidance of potentially significant or adverse effects on European sites. Given the distance from the Borough to the Epping Forest SAC, the fact that most visitors are more local to the SAC and the potential for access to be managed, e.g. through the provision of designated parking and localised recreational and visitor facilities, the potential for significant in-combination effects on European sites to arise from increased visitor pressure is considered unlikely. The delivery of new strategic spaces in the Borough will also provide further mitigation, including the Lea River Park, the Leaway and the Olympic Park. An amendment to the supporting text to Policy D.ES3 on urban greening and biodiversity has however been made to recognise the potential need for HRA at the project level to consider the issue of recreational pressure; and
- ▶ Water supply: Although the risk to European sites is low due to existing controls and distances from receptors, it is suggested that the following clause in D.SG4 "*Consider the impact of construction on the water supply, flood risk and drainage and implement suitable mitigation measures where required*" be modified to reflect the need for public utility capacity to be confirmed available before development proceeds. The Borough Council has indicated that it considers this to be an overly burdensome demand – given responsibility rests both with the utility provider and developer.

These suggestions/amendments will be explored with Natural England through consultation on the Draft Local Plan and this report.

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Annex A Review of plans for 'in combination' effects

# 1. Introduction

## 1.1 The Tower Hamlets Local Plan

The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the regulatory requirements for developing and adopting a Local Plan. Before adoption, this involves preparing and consulting on a Draft Local Plan (Regulation 18), producing a Publication Draft Local Plan (Regulation 19), submitting the Local Plan to the Secretary of State for Communities and Local Government (Regulation 22) and subjecting the Local Plan to public examination (Regulation 24). The London Borough of Tower Hamlets (LBTH) is currently developing its new Local Plan for the period 2015 – 2031. Once adopted the Draft Local Plan will replace the borough's current Local Plan (comprising the Core Strategy and Managing Development Document).

The new Local Plan will set out a vision, strategic priorities and a planning policy framework to guide and manage development in the borough to 2031, in line with the planning policy requirements set out by national and the Mayor of London in the London Plan. The Local Plan is a critical tool for a planning authority to plan proactively and positively for development by focusing on the community needs and opportunities in relation to places, housing, economy, infrastructure, local services and other areas across the Borough. It also seeks to safeguard the environment, adapt to climate change and enhance the natural and historic environment.

## 1.2 Habitats Regulations Assessment

Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the 'Habitats Regulations') states that if a land-use plan "*(a) is likely to have a significant effect on a European site<sup>3</sup> or a European offshore marine site<sup>4</sup> (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site*" then the plan-making authority must "...make an appropriate assessment of the implications for the site in view of that site's conservation objectives" before the plan is given effect. The process by which Regulation 102 is met is known as Habitats Regulations Assessment (HRA)<sup>5</sup>. An HRA determines whether there will be any 'likely significant effects' (LSE) on any European site as a result of a plan's implementation (either on its own or 'in combination' with other plans or projects) and, if so, whether these effects will result in any adverse effects on the site's integrity. LBTH has a statutory duty to prepare the Local Plan and is therefore the competent authority for the HRA.

## 1.3 Purpose of this report

LBTH is currently consulting on the Regulation 19 Draft Local Plan. Regulation 102 essentially provides a test that the final plan must pass; there is no statutory requirement for HRA to be undertaken on draft plans or similar developmental stages (e.g. issues and options; preferred options). However, as with Strategic Environmental Assessment (SEA) it is accepted best-practice for the HRA of strategic planning documents to

<sup>3</sup> Strictly, 'European sites' are: any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') apply; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Habitats Regulations are applied a matter of UK Government policy when considering development proposals that may affect them. "European site" is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

<sup>4</sup> 'European offshore marine sites' are defined by Regulation 15 of *The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007* (as amended); these regulations cover waters over 12 nautical miles from the coast.

<sup>5</sup> The term 'Appropriate Assessment' has been historically used to describe the process of assessment; however, the process is now more usually termed 'Habitats Regulations Assessment' (HRA), with the term 'Appropriate Assessment' limited to the specific stage within the process; see also Box 1.

be run as an iterative process alongside the plan development, with the emerging policies or options continually assessed for their possible effects on European sites and modified or abandoned (as necessary) to ensure that the subsequently adopted plan is not likely to result in significant effects on any European sites, either alone or ‘in combination’ with other plans. This is undertaken in consultation with Natural England (NE) and other appropriate consultees.

Amec Foster Wheeler has been commissioned by LBTH to assist with the HRA of its Local Plan as part of an Integrated Impact Assessment that includes Sustainability Appraisal/Strategic Environmental Assessment, Equalities Impact Assessment and Health Impact Assessment. This report summarises our assessment of the Regulation 19 Draft Local Plan against the conservation objectives of any European sites that may be affected, and summarises the iterative HRA process that is being undertaken to support the plan development and ensure that it meets the requirements of Regulation 102. This report builds on earlier work undertaken at the Regulation 18 stage and has been updated to reflect changes between the two versions of the Local Plan. Natural England confirmed by email on 5<sup>th</sup> of May 2017 that the approach and scope of the HRA as set out in the report that accompanied the Regulation 18 consultation document were acceptable.

The report does not provide a formal conclusion to the HRA process; rather, it identifies potential mechanisms by which the Draft Local Plan could affect European sites and (if necessary) suggests measures that could be employed to avoid significant effects occurring. The report then provides a preliminary conclusion on the likely effects of the Draft Local Plan, which will inform future stages of the plan development and assessment process.

## 2. Approach

### 2.1 HRA of Strategic Plans

#### Overview

The current European Commission (EC) guidance<sup>6</sup> suggests a four-stage process for HRA as shown in **Box 1**, although not all stages may be necessary.

Box 1 – Stages of Habitats Regulations Assessment	
<b>Stage 1 – Screening</b>	This stage identifies the likely impacts upon a European site of a project or plan, either alone or 'in combination' with other projects or plans, and considers whether these impacts are likely to be significant.
<b>Stage 2 – Appropriate Assessment</b>	Where there are likely significant effects, or effects are uncertain, then 'appropriate assessment' is required. This stage considers the impacts of the plan or project on the integrity of the relevant European sites, either alone or 'in combination' with other projects or plans, and with respect to the sites' structure and function and their conservation objectives. Where there are adverse impacts, it also includes an assessment of the potential mitigation for those impacts.
<b>Stage 3 – Assessment of Alternative Solutions</b>	Where adverse impacts are predicted, this stage examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of European sites.
<b>Stage 4 – Assessment Where No Alternative Solutions Exist and Where Adverse Impacts Remain</b>	This stage assesses compensatory measures where it is deemed that the project or plan should proceed for imperative reasons of overriding public interest (IROPI). The EC guidance does not deal with the assessment of IROPI.

At the screening stage, a plan should be considered 'likely' to have an effect if the competent authority (in this case, LBTH) is unable on the basis of objective information to exclude the possibility that it could have significant effects on any European site, either alone or in combination with other plans or projects; an effect will be 'significant' if it could undermine the site's conservation objectives. The 'test of significance' is therefore a relatively low bar: 'significant effects' can generally be interpreted as any negative effects that are not negligible or inconsequential; 'likely' is interpreted as a simple question of whether the plan or project concerned is capable of having an effect<sup>7</sup>.

If 'no significant effect' cannot be established then 'appropriate assessment' is required. What constitutes an 'appropriate' assessment is not defined by the Regulations or the Habitats Directive; however, the assessment must provide a robust, objective, scientific basis for determining whether the integrity of a site is likely to be affected that is proportional to the plan being assessed and the complexity, scale and risk of effects. If the competent authority cannot determine that there will be no adverse effects on the integrity of a site then it must consider alternative solutions for delivering the objectives of the plan or project (Regulation 103); if no alternatives are available, then a case for authorising the plan or project may be made for IROPI.

As noted, Regulation 102 essentially provides a test that the final plan must pass; however, it is preferable for sustainable policies to be developed from the beginning of the plan-making process rather than HRA being a purely retrospective assessment exercise towards the end, and so it is accepted best-practice for the HRAs of strategic plans or policy documents to be run as an iterative process alongside their development. The process of strategic HRA is arguably therefore as much about guiding the development of the plan (and demonstrating that effects on European sites have been considered appropriately) as it is about (ultimately)

<sup>6</sup> Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EC 2002).

<sup>7</sup> Case C-258/11: Judgment of the Court (Third Chamber) of 11 April 2013 and Opinion of the Advocate General dated 22nd November 2012. Peter Sweetman and Others v An Bord Pleanála. Reference for a preliminary ruling: Supreme Court - Ireland.

assessing its effects. The broad aim of this process is to avoid as many potential significant effects as possible through the plan development process, with additional assessment employed as necessary to either determine that adverse effects will not occur; and / or identify appropriate measures that will mitigate or avoid these effects (which can then be incorporated into the plan).

## Guidance

The HRA of the Local Plan is based on case-practice established through the HRAs of similar local tier planning policy documents, and the following general guidance:

- ▶ Defra (2012) *The Habitats and Wild Birds Directives in England and its seas: Core guidance for developers, regulators & land/marine managers*. Defra, London;
- ▶ SNH (2012) *Habitats Regulations Appraisal of Plans: Guidance for plan-making bodies in Scotland*. Scottish Natural Heritage / David Tyldesley Associates;
- ▶ DTA Publications (2016) *The Habitats Regulation Handbook* [online]. Available at: <http://www.dtapublications.co.uk/handbook/>. Accessed 11.06.17;
- ▶ European Commission (2001). *Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*;
- ▶ European Commission (2000). *Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC*. European Commission, Brussels; and
- ▶ European Commission (2007/2012) *Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC: Clarification of the Concepts of: Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion Of The Commission*. European Commission, Brussels.

## 2.2 Summary of Approach

### Screening and appropriate assessment

The principles of 'screening' are applied to the emerging plan or its components (i.e. policies and allocations) to allow the assessment stage to focus on those aspects that are most likely to have potentially significant or adverse effects on European sites, as well as shape the emerging strategy. Screening can be used to 'screen-out' European sites and plan components from further assessment, if it is possible to determine that significant effects are unlikely (e.g. if sites or interest features are clearly not vulnerable (both exposed and sensitive) to the outcomes of a plan due to the absence of any reasonable impact pathways). For the Draft Local Plan. The screening process has been used on the plan 'as a whole'; on the European sites themselves; and on the key components of the plan (the policies and allocations). The screening takes account of measures included in the plan to avoid significant effects. The 'appropriate assessment' stage (if required) provides a more detailed examination of policies or allocations where the effects are likely to be significant, or they are uncertain. Note that undertaking a more detailed assessment of policies or sites does not necessarily imply a conclusion of 'significant effects' for those sites / aspects that are 'screened in' since controls within the plan (i.e. policy measures) will also operate to minimise these effects and in many cases the assessment is completed due to a residual uncertainty; rather, it allows for the assessment of effects to focus on those issues that are potentially important.

### 'In combination' assessment

Article 6(3) of the Habitats Directive requires that the potential effects of the plan on European sites must also be considered 'in combination with other plans or projects'. The 'in combination' assessment must also consider within-plan effects (i.e. between policies or allocations). Consideration of 'in combination' effects is not a separate assessment, but is integral to the screening and appropriate assessment stages and the development of avoidance/ mitigation measures. There is limited guidance available on the scope of the 'in combination' element, particularly which plans should be considered. However, the assessment should not

necessarily be limited to plans at the same level in the planning hierarchy and there is consequently a wide range of plans that could have potential ‘in combination’ effects with the Draft Local Plan. There is also limited guidance on the mitigation that may be appropriate if a European site is already being significantly affected by other plans; this is possible, since some plans will pre-date the requirement for HRA of plans, and therefore cannot be relied on to have no significant effect in their own right.

The plans identified by the SA will provide the basis for the assessment of ‘in combination’ effects; these plans will be reviewed to identify any potential effects and these will be considered (as necessary) within the screening or appropriate assessment. The assessment does not generally include national strategies, national policy or legislation since the Local Plan must be compliant with these. It is considered that in combination effects are most likely in respect of other regional and sub-regional development plans and strategies. Completion of the ‘in combination’ assessment is directly related to the policy wording, and it will often be possible to remove any risk of ‘in combination’ effects through careful construction of the policy (inclusion of ‘avoidance measures’ during policy development); in particular, if there are ‘no effects’ there can be no ‘in combination’ effects.

The assessment of the potential for in-combination effects has been undertaken to inform the assessment of the Regulation 19 Draft Local Plan.

### **Mitigation and avoidance**

The development of avoidance or mitigation measures is key to the HRA and plan development process. Avoidance measures are those that are incorporated into the plan during its development to prevent significant effects on European sites occurring; mitigation measures are used where significant effects are identified in order to prevent adverse effects on a site’s integrity.

Avoidance or mitigation measures should aim to reduce the probability or magnitude of impacts on a European site until ‘no likely significant effects’ are anticipated, and will generally involve the development and adoption of (for example) wording changes or additional policies. Measures must be specific and targeted, and likely to work: it is not appropriate to re-state existing legislation or policy, such as by adding “*and must have no significant effect on any European site*” (or similar) to every policy. The avoidance or mitigation should also account for the limited influence that LBTH can exert on non-planning issues, and should not generally exceed requirements set by national planning policy or guidance.

### **Uncertainty and ‘down the line’ assessment**

For most policies, even at the strategic level, it will be clear if adverse effects are likely, and in these instances the policy should not be included since plans should not include proposals which would be likely to fail the Habitats Regulations tests at the project application stage. It is usually possible to incorporate measures within the plan that are sufficient to ensure that significant adverse effects will not occur and resolve any residual uncertainties. However, for other policies this may not be possible because there is insufficient available information about the nature of the development that is being proposed through the policy to enable a robust conclusion to be reached. In these instances, current guidance indicates that it may be appropriate and acceptable for assessment to be undertaken ‘down-the-line’ at a lower tier in the planning hierarchy. For this to be acceptable, current guidance<sup>8</sup> suggests that the following conditions must be met:

- i. the higher tier plan appraisal cannot reasonably predict the effects on a European site in a meaningful way; whereas;
- ii. the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, retains enough flexibility within the terms of the higher tier plan over the exact location, scale or nature of the proposal to enable an adverse effect on site integrity to be avoided; and
- iii. Habitats Regulations Appraisal of the Plan at the lower tier is required as a matter of law or Government policy

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<sup>8</sup> SNH (2012) Habitats Regulations Appraisal of Plans: Guidance for plan-making bodies in Scotland. Scottish Natural Heritage / David Tyldesley Associates

### 3. Scope of Assessment and Baseline Summary

#### 3.1 Study Area

The spatial scope of any HRA should be based on the likely environmental outcomes of the plan and its 'zone of influence'; and the interest features of the European sites that may be affected and their potential vulnerabilities.<sup>9</sup> It is therefore not usually appropriate to employ 'arbitrary' spatial buffers to determine those European sites that should be considered within an HRA. However, as distance is a strong determinant of the scale and likelihood of most effects the considered use of a suitably precautionary search area as a starting point for the screening (based on a thorough understanding of both the plan outcomes and European site interest features) has some important advantages. Using buffers allows the systematic identification of European sites using GIS, so minimising the risk of sites or features being overlooked, and also ensures that sites where there are no reasonable impact pathways can be quickly and transparently excluded from any further screening or assessment. It also has the significant advantage of providing a consistent point of reference for consultees following the assessment process, allowing the 'screening' to focus on the potential effects, rather than on explaining why certain sites may or may not have been considered in relation to a particular aspect of the plan.

**This study considers potential effects on all European sites within 15km of the LBTH boundary, together with any additional sites that may be hydrologically linked to the plan's zone of influence.** This is considered to be a suitably precautionary starting point for the assessment of the plan. The sites listed in **Table 3.1** are therefore included in the assessment.

Table 3.1 European sites within the study area

Site	Location <sup>†</sup>	Interest Features
<b>Epping Forest SAC</b>	4.2km to NE	<u>Annex I Features:</u> Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer ( <i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i> ); European dry heaths (Q); Northern Atlantic wet heaths with <i>Erica tetralix</i> (Q).  <u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i> .
<b>Richmond Park SAC</b>	13.6 to SW	<u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i> .
<b>Wimbledon Common SAC</b>	11.9km to SW	<u>Annex I Features:</u> European dry heaths (Q); Northern Atlantic wet heaths with <i>Erica tetralix</i> (Q).  <u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i> .
<b>Lee Valley SPA</b>	3.5km to N	<u>Article 4.1 qualification:</u> Bittern <i>Botaurus stellaris</i> (W)  <u>Article 4.2 qualification:</u> Gadwall <i>Anas strepera</i> (W); Shoveler <i>Anas clypeata</i> (W)
<b>Lee Valley Ramsar</b>	3.5km to N	<u>Criterion 2:</u> Supports vulnerable, endangered, or critically endangered species or threatened ecological communities (nationally scarce plant species; rare or vulnerable invertebrates)  <u>Criterion 6:</u> Regularly supports 1% of the individuals in a population of one species/subspecies of waterbirds (gadwall and shoveler in winter)

<sup>9</sup> The vulnerability of an interest feature will depend on its 'sensitivity' and 'exposure' to a potential effect.

### Table Notes

†	Location relative to LNTA administrative area.
Q	Species / habitats present as a qualifying feature; all other features are primary reasons for selection of the site.
W	During winter
Annex I / II	Habitats or species listed on Annex I or II (respectively) of <i>Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora</i> (the 'Habitats Directive')
Article 4.1 / 4.2	Bird species qualifying under Article 4.1 or 4.2 of <i>Directive 2009/147/EC on the Conservation of Wild Birds</i> (the 'new Wild Birds Directive')
Criteria 2, 6	Ramsar criteria; there are nine criteria used as a basis for selecting Ramsar sites.

Data on the European site interest features, their distribution, and their sensitivity to potential effects associated with the plan were obtained from various sources and reports, including the Joint Nature Conservation Committee (JNCC) and Natural England (NE) websites; these included:

- ▶ the site citations;
- ▶ the site boundary and unit GIS data;
- ▶ the Site Improvement Plans (SIPs) and conservation objectives; and
- ▶ information on the site condition, based on the NE condition assessments for corresponding SSSI units.

Thames Estuary and Marshes SPA/Ramsar has not been included in the sites considered in detail as it is considered to be too remote, i.e. approximately 44km from the Borough. The rational for this is expanded on in Section 4 of this document in relation to water quality.

## 3.2 European Site Features and Condition

The interest features of the European sites within the study area, and the current factors affecting them, are summarised in **Table 3.2** and shown on **Figure 3.1**. The percentage of the site in favourable or unfavourable condition was estimated using the NE condition assessments for the corresponding SSSI units, although it must be noted that the boundaries of the component SSSI units (to which the condition assessments relate) do not always match the European site boundaries exactly (i.e. the SSISIs are usually larger) and it is not always possible to split SSSI units to determine the precise area of the European site (or interest feature) that is in each condition category.

There are many factors currently affecting the European sites over which the local plan will have no or little influence, such as inappropriate management of some form (e.g. over- or undergrazing, scrub control, water-level management etc.). The potential mechanisms by which the Local Plan could affect these sites are discussed in **Section 4**.

Figure 3.1: European Sites within 15km of the Borough boundary

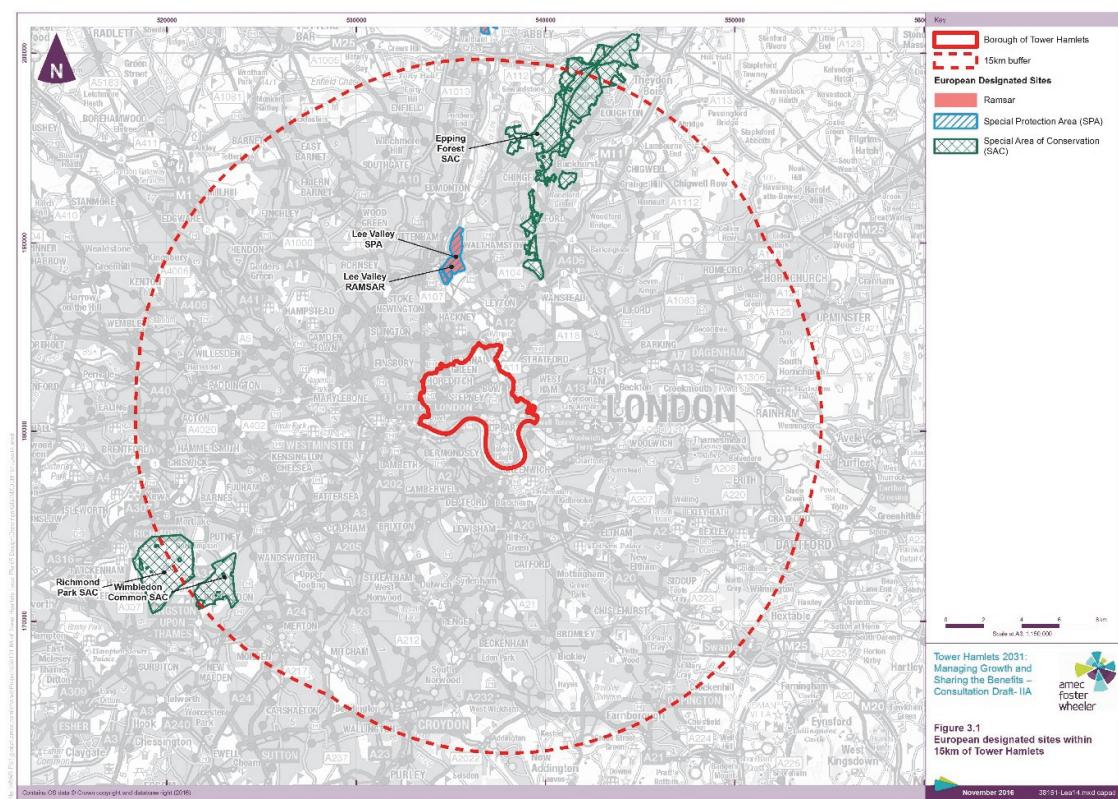


Figure 3.1  
European designated sites within  
15km of Tower Hamlets

Table 3.2 Summary of site characteristics, pressures and threats

Site and Interest Features	Condition**	Summary of current pressures and potential vulnerabilities to outcomes of Local Plan
<b>Epping Forest SAC</b>		
<u>Annex I Features:</u> Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer ( <i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i> ); European dry heaths (Q); Northern Atlantic wet heaths with <i>Erica tetralix</i> (Q).	F: 36.5% UR: 45.6% UNC: 15.9% UD: 2%	<p>The closest point of Epping Forest SAC is around 4.2km from the LBTH area, although the majority of the site is over 10km away. The site citation notes that "<i>Epping Forest is a large ancient wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathland and scattered wetland. The semi-natural woodland is particularly extensive but the Forest plains are also a major feature and contain a variety of unimproved acid grasslands.</i>" The site is subject to a range of ongoing pressures, and most units that are in 'unfavourable' condition are affected by one or more of:</p> <ul style="list-style-type: none"> <li>▶ air pollution (atmospheric nitrogen deposition exceeds site-relevant critical loads for ecosystem protection);</li> <li>▶ management (particularly undergrazing in heath areas); and</li> <li>▶ public access and disturbance.</li> </ul>
<u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i> .		<p>A number of potential threats have also been identified which may be affecting some features, or may in the future (for example, wet heath is dependent on suitable ground water levels which may vary in the future with climate change). With regard to the local plan, the site could be vulnerable to changes in air quality or visitor pressure that may be associated with the overall quantum of development, principally in combination with other plans.</p>
<b>Richmond Park SAC</b>		
<u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i> .	F: 0% UR: 100% UNC: 0% UD: 0%	Richmond Park SAC is approximately 13km from the LBTH area; it is designated for its population of stag beetle <i>Lucanus cervus</i> , which is part of a diverse beetle fauna associated with the ancient trees found throughout the parkland. The site is categorised as 'unfavourable recovering' following the development of a management plan, and the SIP notes that "no current issues affecting the Natura 2000 feature(s) have been identified on this site".
<b>Wimbledon Common SAC</b>		
<u>Annex I Features:</u> European dry heaths (Q); Northern Atlantic wet heaths with <i>Erica tetralix</i> (Q).	F: 0% UR: 95% UNC: 5% UD: 0%	Wimbledon Common SAC is approximately 10km from the LBTH area. It is designated for its range of acidic heath and grassland communities, including wet and dry heaths, and its population of stag beetle <i>Lucanus cervus</i> associated with the old trees and decaying timber around the site. The site is subject to a range of ongoing pressures, and most units that are in 'unfavourable' condition are affected by one or more of:
<u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i> .		<ul style="list-style-type: none"> <li>▶ public access and disturbance; and</li> <li>▶ air pollution (atmospheric nitrogen deposition exceeds site-relevant critical loads for ecosystem protection, particularly for heath and mire vegetation).</li> </ul>
		<p>Habitat fragmentation has also been identified as a threat for stag beetle, although this is primarily associated with the management within the site and between nearby stag beetle sites (e.g. Richmond Park).</p>

Site and Interest Features	Condition**	Summary of current pressures and potential vulnerabilities to outcomes of Local Plan
<b>Lee Valley SPA</b>		
<u>Article 4.1 qualification:</u> Bittern <i>Botaurus stellaris</i> (W)	F: 52.2% UR: 47.8% UNC: 0% UD: 0%	The Lee Valley SPA is approximately 3.5km from the LBTH area at its closest point (Walthamstow Reservoirs) although the majority of the site is over 15km from the LBTH boundary. The SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of artificial and semi-natural wetland habitats; these habitats are used by overwintering gadwall, shoveler and bittern, although only shoveler are noted in the citation for Walthamstow Reservoirs SSSI, and bittern are primarily associated with Rye Meads SSSI in Hertfordshire. No pressures are identified in the SIP, although a series of threats are identified, including water pollution, hydrological changes and visitor pressure which are generally associated with management of the sites.
<b>Lee Valley Ramsar</b>		
<u>Criterion 2:</u> Supports vulnerable, endangered, or critically endangered species or threatened ecological communities (nationally scarce plant species; rare or vulnerable invertebrates)	F: 52.2% UR: 47.8% UNC: 0% UD: 0%	As for Lee Valley SPA; the Walthamstow Reservoirs SSSI citation does not suggest that it is likely to support the key principal Criterion 2 features (whorled water-milfoil <i>Myriophyllum verticillatum</i> or <i>Micronecta minutissima</i> (a water-boatman)) although some of the fringing areas of the reservoir are important for fenland vegetation.
<u>Criterion 6:</u> Regularly supports 1% of the individuals in a population of one species/subspecies of waterbirds (gadwall and shoveler in winter)		

**Key**

†	Location relative to LNTH administrative area.
Q	Species / habitats present as a qualifying feature; all other features are primary reasons for selection of the site.
W	During winter
F	Favourable
UR	Unfavourable recovering
UNC	Unfavourable no change
UD	Unfavourable declining

Annex I / II      Habitats or species listed on Annex I or II (respectively) of *Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora* (the 'Habitats Directive')  
 Article 4.1 / 4.2    Bird species qualifying under Article 4.1 or 4.2 of *Directive 2009/147/EC on the Conservation of Wild Birds* (the 'new Wild Birds Directive')  
 Criteria 2, 6       Ramsar criteria; there are nine criteria used as a basis for selecting Ramsar sites.

\*\* Based on the condition assessments of the SSSI units that correspond to the relevant European sites

## Conservation Objectives

The conservation objectives for all European sites have been revised by NE in recent years to increase consistency of assessment and reporting. As a result, the high-level conservation objectives for all sites are effectively the same:

For SACs:

- ▶ With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'...), and subject to natural change; ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring [as applicable to each site];
  - ▶ The extent and distribution of the qualifying natural habitats;
  - ▶ The extent and distribution of the habitats of qualifying species;
  - ▶ The structure and function (including typical species) of the qualifying natural habitats;
  - ▶ The structure and function of the habitats of qualifying species;
  - ▶ The supporting processes on which the qualifying natural habitats rely;
  - ▶ The supporting processes on which the habitats of qualifying species rely;
  - ▶ The populations of qualifying species; and,
  - ▶ The distribution of qualifying species within the site.

For SPAs:

- ▶ With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features'...), and subject to natural change; ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
  - ▶ The extent and distribution of the habitats of the qualifying features;
  - ▶ The structure and function of the habitats of the qualifying features;
  - ▶ The supporting processes on which the habitats of the qualifying features rely;
  - ▶ The population of each of the qualifying features; and
  - ▶ The distribution of the qualifying features within the site.

The conservation objectives for Ramsar sites are taken to be the same as for the corresponding SACs / SPAs (where sites overlap). The conservation objectives are considered when assessing the potential effects of plans and policies on the sites; information on the sensitivities of the interest features also informs the assessment.

## 4. Screening Assessment

### 4.1 Outcomes of Local Plan and Potential Impact Pathways

Analysis of the available European site data and the SSSI condition assessments indicate that the most common reasons for an ‘unfavourable’ condition assessment of the component SSSI units are effects associated with public access; air pollution; and inappropriate management of some form (e.g. over- or undergrazing, scrub control, water-level management etc.). Public access and air pollution are essentially ‘in combination’ pressures associated with the general development of London. A number of threats to the sites are also identified (e.g. climate change; non-native invasive species) which have the potential to undermine the conservation objectives.

All of the sites are at least 3 km outside the LBTH area and so the Draft Local Plan will not influence development within the immediate vicinity of the sites; any effects will therefore be ‘indirect’, associated with the general quantum of development operating ‘in combination’ with other plans and projects. This also means that the locations of site allocations within LBTH are effectively neutral as far as effects on European sites go. The main mechanism by which the Draft Local Plan could affect the European sites is therefore through policies that direct development (or do not control development) such that significant effects are likely. The main environmental aspects, and the pathways by which the Draft Local Plan could potentially affect European sites, are summarised in the following sections together with any available baseline data on those aspects to inform the assessment. European sites that are particularly vulnerable to a particular aspect (i.e. sensitive and likely to be exposed due to the Local Plan) are identified.

#### **Public Access / Urbanisation Pressures**

Many European sites will be vulnerable (i.e. exposed and sensitive) to significant effects as a result of public access. Typically, this aspect focuses on visitor pressure due to formal and informal recreation, but also includes ‘urbanisation’ pressures more strongly associated with proximity<sup>10</sup>.

As a broad guide urbanisation effects are more likely when developments (etc.) are within 1 km of a designated site, whereas people will typically travel further for recreation. Where sensitive sites are involved development buffers of around 500m are typically used to minimise the effects of urbanisation: for example, the Natural England has identified a 400m zone around the Chichester and Langstone Harbours SPA within which housing development should not be located due to the potential effects of urbanisation (particularly the risk of chick predation by cats, which cannot be mitigated). All of the European sites are at least 3km from LBTH boundary and therefore significant ‘urbanisation’ effects due to the plan and the proximity of development are not considered a likely outcome.

Recreational pressure is usually considered separately as it is less closely associated with proximity. The effects of recreational pressure are complex and very much dependent on the specific conditions and interest features at each site: for example, some bird species are more sensitive to disturbance associated with walkers or dogs than others; some habitats will be more sensitive to trampling or mechanical disturbance than others; some sites will be more accessible than others.

The most typical mechanisms for recreational effects are through direct damage of habitats, or disturbance of certain species. Damage will most often be accidental or incidental, but many sites are particularly sensitive to soil or habitat erosion caused by recreational activities and require careful management of these to minimise any effects – for example, through provision and maintenance of ‘hard paths’ (boardwalks, stone slabs etc.) and signage to minimise soil erosion along path margins. Disturbance<sup>11</sup> of fauna due to recreational activities can also be a significant problem at some sites, although the relationship (again) is

<sup>10</sup> ‘Urbanisation’ is generally used as a collective term covering a suite of often disparate risks and effects that occur due to increases in human populations near protected sites. Typically, this would include aspects such as fly-tipping or vandalism, although the effects of these aspects depend on the interest features of the sites: for example, predation of some species by cats is known to be sizeable (Woods, M. et al. 2003) and can be potentially significant for some European sites.

<sup>11</sup> In this case, literal disturbance by human activity; in ecology, ‘disturbance’ is a more complex concept used in models of ecosystem equilibrium.

highly variable and depends on a range of factors including the species, the time of year and the scale, type and predictability of disturbance. Most studies have focused on the effects on birds, either when breeding or foraging.

With regard to the European sites within the study area, all are sensitive to public access pressure to some extent, although the most exposed to the outcomes of the Draft Local Plan will be **Epping Forest SAC** (heathland and woodland habitats); and **Lee Valley SPA / Lee Valley Ramsar** (disturbance of bird species, particularly those associated with Walthamstow Reservoirs SSSI (shoveler)). Most recreational activities with the potential to affect European sites are 'casual' and pursued opportunistically (e.g. walking, walking dogs, riding) rather than structured (e.g. organised group activities or trips to specific discrete attractions), which ensures that it can be harder to quantify or predict either the uptake or the impacts of these activities on European sites and (ultimately) harder to control or manage. It also means it is difficult to explore in detail all of the potential aspects of visitor pressure at the strategic level. However it is possible for plans and strategies to influence recreational use of European sites through the planning process, for example by increasing the amount of green-space required within or near developments if potentially vulnerable European sites are located nearby.

Attempts to predict the effects of increased recreation on European sites that may be associated with development or allocations derived from strategic plans generally aim to identify the distance within which a certain percentage of visits originate. Several studies have used site-specific questionnaire surveys to identify visitor catchments and characterise the typical use of a site; these data are then used to identify 'buffer zones' within which new development would be considered likely to have significant effects on a site, unless appropriately mitigated. Natural England, as part of its input to the County Durham Plan, has noted that it adopts a '75% rule' to determine significance, whereby recreational buffers are based on the distance within which 75% of visits to the site originate (i.e. taking account of frequency of visits as well as distance travelled); for the Durham Coast SAC, Northumbria Coast SPA / Ramsar and Teesmouth and Cleveland Coast SPA / Ramsar this distance was 6km.

Other studies have identified or used those distances within which approximately 70 - 75% of visitors live when considering recreational buffer areas. Some examples are summarised in **Table**, although note that these are necessarily selective as not all studies considering visitor pressure have necessarily reported percentiles; however, they provide some good examples for European sites that have similarities to sites near Thanet, including the presence of nearby urban areas.

**Table 4.1** Travel distances for ~70 – 75% of visitors recorded by previous studies

Study	European sites and key issues	Summary
<b>Solent Disturbance and Mitigation Project (Fearnley et al. 2010)</b>	Solent Maritime SAC Chichester and Langstone Harbours SPA Pagham Harbour SPA Chichester and Langstone Harbours Ramsar Pagham Harbour Ramsar (Coastal sites; major urban areas; disturbance of birds)	Half of all visitors arriving on foot lived within 0.7km; half of all visitors arriving by car lived more than 4km away. Average travel distance (excluding holidaymakers): 5.04km. 75% of visits from postcodes within 5.6km.
<b>Thames Basin Heaths (Liley et al. 2005)</b>	Thames Basin Heaths SPA (Heathland sites; urban areas; disturbance of birds)	70% of visitors travel 5km or less to access sites

Study	European sites and key issues	Summary
<b>Whitehall and Bordon Ecotown (EPR 2012)</b>	Wealden Heaths SPA Shortheath Common SAC Woolmer Forest SAC Thursley, Ash, Pirbright and Chobham SAC Thursley and Ockley Bogs Ramsar site (Heathland and woodland sites; urban areas; disturbance of birds; damage to heath)	Average travel distance: 6.7km. 70% of visitors travel 4.3km or less to access sites. 70% distance values for following component sites: <ul style="list-style-type: none"> <li>▶ Frensham Common: 10.7km</li> <li>▶ Kingsley Common: 7.4km</li> <li>▶ Bramshott Common: 4.5km</li> <li>▶ Woolmer Forest: 3.4km</li> <li>▶ Longmoor Enclosure: 3.2km</li> <li>▶ Ludshott Common: 2.9km</li> <li>▶ Broxhead Common: 2.1km</li> <li>▶ Hogmoor Inclosure: 0.9km</li> <li>▶ Shortheath Common: 0.6km</li> <li>▶ Bordon Enclosure: 0.5km</li> </ul>
<b>Ashdown Forest (UE / University of Brighton 2009)</b>	Ashdown Forest SPA (Heathland sites; urban areas; disturbance of birds)	76% of visitors travel 5km or less to access sites

For most sites, the distance that 70 – 75% of visitors travel is typically less than 6 – 7km. Given that most studies have demonstrated that reported visit frequency increases with proximity to a site, it is reasonable to assume that the '75% distance'<sup>12</sup> for visits to most sites is likely to be less than this. However, it is important to recognise that visitor behaviour is complex and generalised statistics can hide important variations in the use of a site (for example, the 75% distance is likely to vary depending on the access point surveyed; this may be particularly relevant for larger sites such as the Thanet Coast and Sandwich Bay SPA / Ramsar). Any derived buffers must be applied cautiously as the precise distance will depend on the site: a remote upland European site favoured by recreational walkers will probably have a substantially larger 75% distance for visits than the Thanet Coast and Sandwich Bay SPA / Ramsar that is adjacent to Margate.

Secondary buffers are also sometimes identified to reflect the variation in visitor behaviour, particularly for those that live in close proximity to a site; for example, the studies supporting the County Durham Plan adopted a 400m buffer also, since 59% of respondents living within the 0 – 400 metre buffer were high risk users, i.e. visit the coast between one and three times a day.

Although distance and journey time are major factors influencing recreational use of a site, generic distances for recreational buffer zones are not usually employed, and there is limited consistency between studies when it comes to rationalising buffer zone size largely due to the site-specific variables that are factored in to the assessment. Some visitor survey data is available for Epping Forest (City of London 2014); these data indicate that around 95% of all visitors live within 2km of the forest, and that around 50% of survey respondents visit daily or weekly. Although it is not possible to derive a precise distance within which 75% of visits originate using these figures, it is clear that it is likely to be substantially less than the 6 – 7km typically reported in other studies, and more likely to be 1 – 3km at most<sup>13</sup>, particularly in the southern areas of the site that have much larger surrounding populations. This is to be expected for a site surrounded by densely populated urban areas. It should also be noted that the management strategy for the forest involves attracting visitors to 'honeypot' areas with facilities such as car parks and seating, so reducing visitor pressure on the more sensitive areas. There is no equivalent visitor survey data for Lee Valley SPA, but it is likely that visitor patterns would be broadly similar to Epping Forest, particularly in the urban site units

<sup>12</sup> i.e. the distance within which 75% of visits originate.

<sup>13</sup> As a very coarse estimate, to be used very advisedly: 2014 surveys of 885 people suggested that 22% visited Epping Forest daily; 31% weekly; 19% monthly; 16% two or three times a year; 3% once annually; and 10% less than once annually. This distribution would be equate to around 87000 visits per year by these 885 people; the 75% value for number of visits would be around 65000. If 22% of the respondents account for around 71000 visits, and 95% of these respondents (~185) live within 2km, then these 185 would undertake around 67500 visits annually – or over 75% of the 87000 visits undertaken by the respondents in total. However, the survey methods may not necessarily support this type analysis (e.g. selection method for respondents uncertain; data relate to the whole forest rather than the SAC specifically) and the reported 2014 data are perhaps too partial to provide certainty, but the data do suggest that the vast majority of visits are almost certainly undertaken by people living within 2km or less.

(although the recreational use of some reservoirs for water sports is likely to increase the distance most visitors travel to these).

## Atmospheric Pollution

A number of pollutants have a negative effect on air quality; however, the most significant and relevant to habitats and species (particularly plant species) are the primary pollutants sulphur dioxide ( $\text{SO}_2$ , typically from combustion of coal and heavy fuel oils), nitrogen oxides ( $\text{NO}_x$ , mainly from vehicles) and ammonia ( $\text{NH}_3$ , typically from agriculture), which (together with secondary aerosol pollutants<sup>14</sup>) are deposited as wet or dry deposits. These pollutants affect habitats and species mainly through acidification and eutrophication. Table 4.2 summarises the main air pollutants. Acidification increases the acidity of soils, which can directly affect some organisms but which also promotes leaching of some important base chemicals (e.g. calcium), and mobilisation and uptake by plants of toxins (especially metals such as aluminium). Air pollution contributes to eutrophication within ecosystems by increasing the amounts of available nitrogen (N)<sup>15</sup>. This is a particular problem in low-nutrient habitats, where available nitrogen is frequently the limiting factor on plant growth, and results in slow-growing low-nutrient specialists being out-competed by faster growing species that can take advantage of the increased amounts of available N.

**Table 4.2 Main Air Pollutants, Pathways and Effects**

Pollutant	Pathway	Summary of Effects
<b>Ammonia (<math>\text{NH}_3</math>)</b>	Primarily from agriculture through decomposition of animal manure and slurry.	Emissions contribute to acidification and (particularly) eutrophication.
<b>Nitrogen oxides (<math>\text{NO}_x</math>)</b>	All combustion processes produce oxides of nitrogen ( $\text{NO}_x$ ) in air; road transport is the main source, followed by the electricity supply industry. $\text{NO}_x$ emissions have decreased with increased fuel efficiency and catalytic converters	Emissions contribute to acidification and eutrophication; contribute to formation of secondary particles and ground level ozone.
<b>Sulphur Dioxide (<math>\text{SO}_2</math>)</b>	Sulphur dioxide is released when fuels containing sulphur are burnt, especially coal and heavy fuel oils. The energy industry was the primary source, although this has decreased as use of coal has decreased.	$\text{SO}_2$ dissolves readily in water to form an acid which contributes to acidification of soils and water.

Overall in the UK, there has been a significant decline in  $\text{SO}_x$  and  $\text{NO}_x$  emissions in recent years and a consequent decrease in acid deposition; in England,  $\text{SO}_x$  and  $\text{NO}_x$  have declined by 90% and 65% respectively since 1990 (NAEI 2014), the result of a switch from coal to gas and nuclear for energy generation, and increased efficiency and emissions standards for cars. These emissions are generally expected to decline further in future years. In contrast, emissions of ammonia have remained largely unchanged: they have declined by 20% in England since 1990 (NAEI 2014), but have remained largely stable since 2008 (1% decrease from 2008 – 2011; 2.8% increase from 2011 – 2012). In London, average  $\text{NO}_x$  background levels have shown a slow decline since 2008 (London Datastore 2016).

The effect of  $\text{SO}_x$  and  $\text{NO}_x$  decreases on ecosystems has been marked, particularly in respect of acidification; the key contributor to acidification is now thought to be deposited nitrogen, for which the major source (ammonia emissions) has not decreased significantly. Indeed, although it is estimated that the proportion of UK semi-natural ecosystems that exceed the critical loads for eutrophication will decline from 40% to 32% by 2010 (NEGTAP 2001), eutrophication from N-deposition (again, primarily from ammonia) is now considered the most significant air quality issue for many habitats.

The UK Air Pollution Information System (APIS) has been interrogated to identify those European sites and features where critical loads<sup>16</sup> for nutrient-N deposition and acidification are met or exceeded. APIS provides

<sup>14</sup> Secondary pollutants are not emitted, but are formed following further reactions in the atmosphere; for example,  $\text{SO}_2$  and  $\text{NO}_x$  are oxidised to form  $\text{SO}_4^{2-}$  and  $\text{NO}_3^-$  compounds; ozone is formed by the reaction of other pollutants (e.g.  $\text{NO}_x$  or volatile organic compounds) with UV light; ammonia reacts with  $\text{SO}_4^{2-}$  and  $\text{NO}_3^-$  to form ammonium ( $\text{NH}_4^+$ ).

<sup>15</sup> Nitrogen that is in a form that can be absorbed and used by plants.

<sup>16</sup> 'Critical Loads' are the threshold level for the deposition of a pollutant above which harmful indirect effects can be shown on a habitat or species, according to current knowledge (APIS 2009).

a comprehensive source of information on air pollution and the effects on habitats and species and although there are limitations to the data (see SNIFFER 2007), particularly related to the scale at which data can be modelled, this provides the best basis for assessing the impacts of air emissions in the absence of site-by-site monitoring data.

Error! Reference source not found. summarises the APIS data for European sites with features that are sensitive to air quality in the study area. All other sites are either not sensitive to air emissions, or do not have the critical load (CL) exceeded. It should be noted that CL values are generally provided for habitats rather than species, and that watercourses are not included as eutrophication of most watercourses due to air emissions is negligible compared to run-off from agricultural land.

**Table 4.3 Summary of APIS interrogation**

Site	Air quality sensitive features (abbreviated)	Over CL?	
		Acid	N
<b>Epping Forest SAC</b>	Atlantic acidophilous beech forests	++	++
	European dry heaths	+	++
	Northern Atlantic wet heaths	+	++
<b>Wimbledon Common SAC</b>	European dry heaths	+	+
	Northern Atlantic wet heaths	+	+
<b>Epping Forest SAC</b>	Atlantic acidophilous beech forests	++	++
	European dry heaths	+	++
	Northern Atlantic wet heaths	+	++

#### Key

CL Critical load

Acid Acidification

N Eutrophication

n/a Critical load not set for feature / feature not sensitive

- below minimum CL for that habitat

+ minimum CL for that habitat is exceeded

++ maximum CL for that habitat is exceeded

The proposals within the Draft Local Plan may indirectly contribute to local air pollution and wider diffuse pollution, but quantifying these effects is difficult. In practice, the principal source of air pollution associated with the plan will be associated with changing patterns of vehicle use due to the promotion of new development and housing sites (since the plan does not provide for any new significant point-sources). The Department of Transport's *Transport Analysis Guidance*<sup>17</sup> states that "beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant" and therefore this distance is used to determine the potential significance of any local effects associated with the plan. Environment Agency guidance (EA 2009) also states that "Where the concentration within the emission footprint in any part of the European site(s) is less than 1% of the relevant long-term benchmark (EAL, Critical Level or Critical Load), the emission is not likely to have a significant effect alone or in combination irrespective of the background levels". More broadly, the plan proposals may indirectly contribute to wider diffuse pollution within and beyond the LBTH boundary, in combination with other developments, plans and programmes. There is little guidance on the assessment of diffuse pollution, although NE have previously indicated to Runnymede Borough Council that the HRA of its local plan "can only be concerned with locally emitted and short range locally acting pollutants" as wider diffuse pollution is beyond the control or remit of the authority.

<sup>17</sup> <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013>; accessed 15/06/14

This is arguably correct, since trans-boundary air pollution can only be realistically addressed by national legislation or higher-tier plans, policies or strategies. This does not mean, however, that consideration of air quality effects should be limited to specific 'sources' within the LPA boundary (and hence under LPA control); in particular, a consequent effect of development or growth may be changes in traffic behaviour or volume on road outside the LPA boundary, which could affect European sites alone or in combination. Generally, however, if there is not a clear impact pathway for effects, then any assessment must focus on the development of suitable mitigating policy that will minimise the contribution of plan-supported development to overall diffuse pollution.

## Water Resources and Flow Regulation

The exploitation and management of water resources is connected to a range of activities, most of which are not directly controlled or influenced by the Local Plan; for example, agriculture, flood defence, recreation, power generation, fisheries and nature conservation. Much of the water supply to water-resource sensitive European sites is therefore managed through specific consenting regimes that are independent of the Local Plan.

It is clear that development promoted or supported by the Local Plan is likely to increase demand for water, which could indirectly affect some European sites. When assessing the potential effects of increased water demand it is important to understand how the public water supply (PWS) system operates and how it is regulated with other water-resource consents. Thames Water (TW) is responsible for supply to the LBTH area, which is within its London Water Resource Zone (WRZ)). TW derives 80% of its supply to London from surface water, with the remainder from aquifers.

Under the Water Act 2003 all water companies must publish a Water Resources Management Plan (WRMP) that sets out their strategy for managing water resources across their supply area over the next 25 years. WRMPs use calculations of Deployable Output (DO) to establish supply/demand balances; this enables them to identify those Water Resource Zones (WRZs) with potential supply deficits over the planning period<sup>18</sup>. The calculations account for any reductions in abstraction that are required to safeguard European sites<sup>19</sup> and so the WRMP process (with other regulations) helps ensure (as far as is achievable) that future changes in demand will not affect any European sites<sup>20</sup>.

TW accounted for the growth predicted for London in its forecasting for the 2015 – 2040 WRMP, and identified a supply-demand deficit for the London WRZ over the planning period. TW will meet this predicted deficit through a combination of: demand management; new groundwater abstractions; licence transfers; and wastewater re-use schemes. The WRMP has been subject to HRA, which has concluded that the preferred options will have no significant effect on any European sites, including those water-resource sensitive sites within the study area (e.g. **Lee Valley SPA / Lee Valley Ramsar**). The WRMP provides the best estimate of future water resource demand, and therefore it is reasonable to assume that the growth predicted within the LBTH plan can be accommodated without significant effects on any European sites due to PWS abstractions. Furthermore, since the WRMP explicitly accounts for the growth predicted across London, 'in combination' effects between the Local Plan and the WRMP are unlikely to occur as a result of this mechanism. Having said that, the Local Plan can obviously help manage demand and promote water efficiency measures through its policies.

<sup>18</sup> Forecasts are completed in accordance with the Water Resources Planning Guidelines (published by the Environment Agency) and take into account (*inter alia*) economic factors (economic growth, metering, pricing), behavioural factors (patterns of water use), demographic factors (population growth, inward and outward migration, changes in occupancy rate), planning policy (LPA land use plans), company policies (e.g. on leakage control and water efficiency measures) and environmental factors, including climate change. The WRMP therefore accounts for these demand forecasts based on historical trends, an established growth forecast model and through review of local and regional planning documents.

<sup>19</sup> For example, sustainability reductions required by the Review of Consents (RoC) or the Environment Agency's Restoring Sustainable Abstractions (RSA) programme. It should be noted that, under the WRMP process, the RoC changes (and non- changes to licences) are considered to be valid over the planning period. This means that the WRMP (and its underlying assumptions regarding the availability of water and sustainability of existing consents) is compliant with the RoC and so the WRMP can only affect European sites through any new resource and production-side options it advocates to resolve deficits, and not through the existing permissions regime.

<sup>20</sup> Calculations of DO include for Target Headroom (precautionary 'over-capacity' in available water) to buffer any unforeseen variation in predicted future demand; the WRMP is also reviewed on a five-yearly cycle to ensure it is performing as expected and to account for any variations between predicted and actual demand.

## Water Quality

Most waterbodies and watercourses in London are affected by point or diffuse sources of pollutants, notably nitrates and phosphates. Point sources are usually discrete discharge points, such as wastewater treatment works (WTW) outfalls, which are generally managed through specific consenting regimes that are independent of the Local Plan. Development promoted or supported by the Local Plan is likely to increase demand on wastewater treatment works, and potentially increase run-off which could theoretically affect some European sites in the Thames Estuary (as the ultimate downstream receptor); however, these effects are likely to be very weak and the LBTH plan does not promote any developments that are individually likely to result in significant effects due to increased sewerage requirements and, provided that the planning process allows for timely delivery of additional treatment capacity, new developments should not have any 'in combination' quantum of development effects.

Run-off from impermeable surfaces can have considerable effects on waterbodies and watercourses, and is a notable issue in both urban and rural areas. Development has traditionally sought to capture and divert rain and run-off to the nearest watercourse or treatment facility as quickly as possible, and extensive drainage networks have been developed to facilitate this. However, as developed areas have increased so the total volumes and flow rates of run-off have increased also. This has two principal effects: firstly, impermeable surfaces provide very little resistance to the mobilisation and transport of pollutants within run-off; and secondly, flow rates and volumes often exceed the capacity of the receiving drains or watercourses, causing localised flooding or the operation of combined sewer overflows (CSOs)<sup>21</sup>. The effect of run-off from developed areas can be mitigated or reduced by the use of Sustainable Drainage Systems (SuDS) and by increasing the area of permeable surfaces (both natural and artificial) within developed areas. These measures offer effective attenuation by reducing the volumes of surface run-off. They also increase the retention of pollutants and, in the case of some SuDS, can allow for treatment of pollutants.

The nearest 'downstream' European sites are the Thames Estuary and Marshes SPA and Thames Estuary and Marshes Ramsar, which are over 44km downstream of the LBTH area; natural attenuation alone would ensure that significant effects as a result of development in LBTH alone will not occur, and it is arguable that development here will in fact have 'no effect' on these sites (and hence no 'in combination' effects either). Therefore, effects on downstream European sites due to water quality changes associated with the plan are not considered further. Notwithstanding this (and the fact that water quality effects of the plan are ultimately controlled by existing consents regimes (which must undergo HRA)) it is appropriate and good-practice for the plan to include measures that help minimise the risk of plan-supported development affecting water quality in the Thames.

## Flooding and Water Level Management

The implementation of the European Floods Directive (Directive 2007/60/EC) in England and Wales is being co-ordinated with the Water Framework Directive. Catchment Flood Management Plans (prepared by the Environment Agency) and Shoreline Management Plans (prepared by coastal Local Authorities and the Environment Agency) set out long term policies for flood risk management. The delivery of the policies from these long term plans will help to achieve the objectives of this and the River Basin Management Plans.

Development supported by the Local Plan is unlikely to significantly alter the regional flood risk levels, but may exacerbate the effects of local flooding: run-off from impermeable surfaces can have considerable effects on waterbodies and watercourses, meaning that flow rates and volumes often exceed the capacity of the receiving drains or watercourses. This can lead to local water quality impacts on European sites. The effect of run-off from developed areas can be mitigated or reduced by the use of Sustainable Drainage Systems (SuDS) and by increasing the area of permeable surfaces (both natural and artificial) within developed areas. However, the distance of LBTH from any European sites, and the absence of hydrological linkages ensures that there are not likely to be any effects on any sites via this pathway.

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<sup>21</sup> All sewerage pipes have a certain capacity, determined by the size of the pipe and the receiving WTW. At times of high rainfall this capacity can be exceeded, with the risk of uncontrolled bursts. CSOs provide a mechanism to prevent this, by allowing untreated sewerage to mix with surface water run-off when certain volumes are exceeded. This is then discharged to the nearest watercourse.

## Effects on Critical Habitats Outside of European Sites

The provisions of the Habitats Regulations ensure that 'direct' (encroachment) effects on European sites as a result of land use change (i.e. the partial or complete destruction of a European site) are extremely unlikely under normal circumstances, and this will not occur as a result of the Draft Local Plan. However, many European interest features (particularly animal species) may use or be reliant on non-designated habitats outside of a European site during their life-cycle. Developments some way from a European site can therefore have an effect if its interest features are reliant on the habitats being affected by the development.

With regard to the European sites within the study area, this is only potentially an issue for those supporting the stag beetle *Lucanus cervus* (Epping Forest SAC, Richmond Park SAC and Wimbledon Common SAC), and Lee Valley SPA / Lee Valley Ramsar (overwintering gadwall and shoveler).

## 4.2 Initial Screening of European Sites

All European sites within 15km of the LBTH boundary have been included in the scope of the HRA. Often, however, sites or interest features within a study area can be excluded from further assessment at an early stage ('screened out') because the plan or project will self-evidently have either 'no effect' or 'no significant effect' on these sites (i.e. the interest features are not sensitive to likely effects of plan or project; or are not likely to be exposed to those effects due to the absence of any reasonable impact pathways). The following sections provide a brief summary of the initial screening of the European sites and their interest features based on the baseline data summarised above and the preferred options and policies. It should be noted that this aspect of the screening process is a 'low bar', with sites, aspects or features only 'screened out' if they will self-evidently be unaffected by the LBTH plan (i.e. it is aiming to identify those aspects that will clearly have 'no effect' or 'no significant effect' (alone or in combination) due to an absence of impact pathways). It does not necessarily imply a conclusion of 'significant effects' for those sites that are 'screened in' since controls within the plan (i.e. policy measures) will also operate to minimise these effects (these are considered in the next section). Rather, it allows for the policy development to focus on those effects that are potentially important, and which may require bespoke policy measures to prevent significant effects in addition to the general protective policies.

The screening of the sites and interest features takes account of those general protective policies that are proposed as part of the plan. In addition, it is appropriate to assume that all relevant lower tier consents and permissions (etc.) will be correctly assessed and controlled, and that any activities directly or indirectly supported by the plan will adhere to the relevant legislative requirements and all normal best-practice (e.g. it would be inappropriate to assume that normal controls on, say, the installation of new discharge to a watercourse would not be correctly followed).

### Epping Forest SAC

The closest point of Epping Forest SAC is around 4.2km from the LBTH area, although the majority of the site is over 10km away. The site is subject to a range of ongoing pressures, although those most likely to be associated with the LBTH plan are air pollution (in combination) and public access and disturbance. **Table 4.4** provides a summary of site screening based on impact pathways for the site.

**Table 4.4 Summary of site screening based on impact pathways**

<b>Aspect</b>	<b>Initial Screening Summary</b>	<b>Consider further?</b>
<b>Public access and disturbance</b>	<p>One of the main pressures on Epping Forest is public access and associated degradation of habitats. There are no LBTH development proposals within 500m of the site (so proximate 'urbanisation' effects are not likely) and the majority of the site is over 10km from the LBTH area. As noted, visitor survey data for Epping Forest (City of London 2014) indicate that around 95% of all visitors live within 2km of the forest, and that around 50% of survey respondents visit daily or weekly. Although it is not possible to derive a precise distance within which 75% of visits originate (the metric typically used by Natural England when considering whether effects are likely to be significant), it is very likely that the distance from the Forest within which 75% of visits originate is substantially less than the 6 – 7km typically reported in other studies, and more likely to be 2 - 3km at most (particularly in the southern areas of the site that have much larger surrounding populations in close proximity). This is to be expected for a site surrounded by densely populated urban areas. It should also be noted that the management strategy for the forest involves attracting visitors to 'honeypot' areas with facilities such as car parks and seating, so reducing visitor pressure on the more sensitive areas. Whilst residents from LBTH will periodically use the Forest it would appear unlikely that the distance within which 75% of visits originate would be over 4km, particularly in the southern areas of the site where local populations are greater. On this basis, it is considered that the LBTH plan will not have a significant effect on Epping Forest SAC due to increases in visitor pressure associated with growth within LBTH. Having said that, it would be appropriate for the plan to include policies that might encourage informal recreation to take place locally (e.g. maximising opportunities for traffic-free paths and routes).</p>	Review plan policies for opportunities to enhance local recreation.
<b>Atmospheric pollution</b>	<p>Atmospheric pollution, particularly N-deposition is identified as a current pressure for this SAC, and the critical loads for N-deposition are exceeded for all three of the habitat interest features. The SAC / SSSI unit closest to LBTH (Leyton Flats &amp; Hollow Pond) is in 'unfavourable no change' condition due to air pollution (although this unit is in close proximity to the A12 and surrounded by other well-used roads).</p> <p>The LBTH plan does not include proposals for developments that are likely to have significant point-source emissions, and traffic on roads within LBTH is not likely directly affect the woodland (as noted, guidance suggests that "<i>beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant</i>"). However, general increases in traffic associated with growth within LBTH has the potential to affect Epping Forest through contributions to wider diffuse pollution beyond the LBTH boundary. The LBTH plan should focus on the development of suitable policies that will minimise the contribution of plan-supported development to overall diffuse pollution. Policy 7.14 of the London Plan requires development to be air quality neutral and Policy D.ES2 of the Local Plan also requires this.</p>	Review plan policies for opportunities to minimise and reduce contributions to air pollution.
<b>Water resources</b>	PWS and other abstractions are not identified as a pressure at this site, and the water-level sensitive features of the site are not considered sensitive to water resource permissions (i.e. water levels are a function of local management and drainage impedance rather than abstraction); they are therefore unlikely to be affected by growth in the LBTH area.	No
<b>Water quality</b>	The site is not hydrologically connected to the LBTH area; water quality will not be affected by the outcomes of the LBTH plan.	No
<b>Flooding / water management</b>	The site is not hydrologically connected to the LBTH area so water quality will not be affected by the outcomes of the LBTH plan.	No
<b>Effects on mobile species</b>	Effects on the stag beetle feature are only possible if there are potentially significant habitat areas within LBTH that are used by the species (e.g. as a 'stepping stone' between sites in London) and are affected by development. As Tower Hamlets is one of the most urban London Boroughs it is extremely unlikely that there are such areas or habitat resources, and there are no nationally or locally designated sites within the Borough that have stag beetle as an interest feature or which appear to support the features that would typically be required for this species (substantial dead wood). The plan will have no effects in this regard.	No

## Richmond Park SAC

Richmond Park SAC is over 13km from the LBTH, and no pressures have been identified that are currently affecting this site. Realistically, there are no reasonable pathways by which this site could be affected as a result of the LBTH plan, and there will be no effects (and hence no 'in combination' effects).

## Wimbledon Common SAC

Wimbledon Common is around 10km from the LBTH. As with Epping Forest SAC, the principal pressures are air pollution (in combination) and public access and disturbance. However, given the distance and location (to the south-west of LBTH and so behind the prevailing wind) of the SAC is it considered that the LBTH plan will not contribute to increasing these pressures on Wimbledon Common SAC, and so there will be no effects (and hence no 'in combination' effects) on this site. This is also the case for the other aspects (water quality, etc.) where there are no reasonable pathways by which this site could be affected as a result of the LBTH plan.

## Lee Valley SPA / Lee Valley Ramsar

The Lee Valley SPA and Lee Valley Ramsar are approximately 3.5km from the LBTH area at its closest point (Walthamstow Reservoirs) although the majority of the site is over 15km from the LBTH boundary. No pressures are identified in the SIP, although a series of threats are identified, including water pollution, hydrological changes and visitor pressure, which are generally associated with management of the sites. **Table 4.5** provides a summary of site screening based on impact pathways for the site.

**Table 4.5** Summary of site screening based on impact pathways

Aspect	Initial Screening Summary	Consider further?
<b>Public access and disturbance</b>	<p>One of the threats identified for this SPA is visitor pressure. The nearest units of the SPA (Walthamstow Reservoirs SSSI and Chingford Reservoirs SSSI) are in 'unfavourable recovering' condition, due primarily to decreases in shoveler numbers, but this is not thought to be associated with the management (including recreational use) of the reservoirs, rather reflecting wider population trends or changes in site preferences.</p> <p>Walthamstow Reservoirs are being transformed into a distinctive urban wetland nature reserve. Recast as Walthamstowe Wetlands<sup>22</sup> an £8.7m project is being led by the London Borough of Waltham Forest in partnership with Thames Water and key stakeholders, including Environment Agency, Natural England, the Greater London Authority and the London Wildlife Trust. The Trust who will be responsible for conserving and enhancing the site's wildlife and heritage. The Trust has developed a programme of public engagement activities including formal and informal learning, volunteering and training. Four new entrances at Forest Road, Lockwood Way and Coppermill Lane, which will be linked by a 1.7km new foot and cycle path. Habitat enhancement work includes 2 hectares of reed beds.</p> <p>As with Epping Forest SAC there are no LBTH development proposals within 500m of the site (so proximate 'urbanisation' effects are not likely) and the majority of the site is over 15km from the LBTH area. No relevant visitor survey data is available, but it is likely that survey results would demonstrate similar patterns (most visitors living in close proximity) although the nature of the recreational opportunities at the reservoirs (bird-watching, angling) is likely to increase the distance over which users will travel.</p> <p>However, the LBTH plan is likely to have little effect on visitor numbers to the SPA as a whole (or even to the closest units) and as visitor pressure is not currently identified as a significant pressure at the site it is considered that the LBTH plan is unlikely to have significant effects on this site, alone or in combination. Having said that, it would be appropriate for the plan to include policies that might encourage informal recreation to take place locally (e.g. maximising opportunities for traffic-free paths and routes). Walthamstowe Reservoirs are also being promoted</p>	Review plan policies for opportunities to enhance local recreation.

<sup>22</sup> <http://www.walthamstow-wetlands.org.uk/>

Aspect	Initial Screening Summary	Consider further?
<b>Atmospheric pollution</b>	Air pollution (N-deposition) is only identified as a threat in relation to bittern (due to impacts on reedbed habitats); these are periodically recorded in Walthamstow Reservoirs but are not currently thought to be a significant component of the bird assemblage (although recent reedbed creation is likely to alter this).  As with Epping Forest SAC, the LBTH plan does not include proposals for developments that are likely to have significant point-source emissions, and traffic on roads within LBTH is not likely directly affect the woodland (as noted, guidance suggests that " <i>beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant</i> "). However, general increases in traffic associated with growth within LBTH has the potential to affect the SPA through contributions to wider diffuse pollution beyond the LBTH boundary, although as noted current case-practice suggests that diffuse pollution is beyond the control or remit of the LPA. As air pollution is not currently identified as a significant pressure at the site it is considered that the LBTH plan is unlikely to have significant effects on this site, alone or in combination. Having said that, it would be appropriate for the plan to include policies that minimise the contribution of plan-supported development to overall diffuse pollution. Policy 7.14 of the London Plan requires development to be air quality neutral and Policy D.ES2 of the Local Plan also requires this.	Review plan policies for opportunities to minimise and reduce contributions to air pollution.
<b>Water resources</b>	PWS and other abstractions are not identified as a pressure at this site, and the closest units to the LBTH area are all highly-managed reservoirs.	No
<b>Water quality</b>	The site is not hydrologically connected to the LBTH area; water quality will not be affected by the outcomes of the LBTH plan.	No
<b>Flooding / water management</b>	The site is not hydrologically connected to the LBTH area so water quality will not be affected by the outcomes of the LBTH plan.	No
<b>Effects on mobile species</b>	The mobile interest features of the SAC are unlikely to make significant use of non-designated habitats within the LBTH area or the zone of influence of its plan, and significant effects would not be expected.	No

## 4.3 Site Allocations Screening

As all of the site allocations are at least 3.5km from the nearest European site none are more or less likely to affect the sites, and developments in these locations will not (in themselves) have significant effects on any sites.

## 4.4 Policies

### Overview of Screening

The draft policies in the Regulation 19 Local Plan have been reviewed, taking into account the interest features of the relevant European sites and the likely outcomes of the policies as drafted. Policies may have effects in their own right, or they may be used to control potential effects or prevent them occurring. A policy should be considered 'likely' to have an effect if the competent authority is unable (on the basis of objective information) to exclude the possibility that the plan could have significant effects on any European site, either alone or in combination with other plans or projects; an effect will be 'significant' if it could undermine the site's conservation objectives. However, it is important that the policy assessment focuses on effects that are objectively possible, rather than just imaginable; furthermore, it is not appropriate for policies to simply re-state existing legislation.

When considering the likely effects of a policy, it is recognised that some policy 'types' cannot result in impacts on any European sites. Different guidance documents suggest various classification and referencing systems to help identify those policies that can be safely screened out; the general characteristics of these policy types are summarised in **Table 4.6**.

**Table 4.6 Policy ‘types’ that can usually be screened out**

Broad policy type	Notes
<b>General statements of policy / aspiration</b>	The European Commission recognises* that plans or plan components that are general statements of policy or political aspirations cannot have significant effects; for example, general commitments to sustainable development.
<b>General design / guidance criteria or policies that cannot lead to or trigger development</b>	A general ‘criteria based’ policy expresses the tests or expectations of the plan-making body when it comes to consider proposals, or relates to design or other qualitative criteria which do not themselves lead to development (e.g. controls on building design); however, policies with criteria relating to specific proposals or allocations should not be screened out.
<b>External plans / projects</b>	Plans or projects that are proposed by other plans and are referred to in the plan being assessed for completeness (for example, Highways Agency road schemes; specific waste development proposals promoted by a County Minerals and Waste Plan).
<b>Environmental protection policies</b>	Policies designed to protect the natural or built environment will not usually have significant or adverse effects (although they may often require modification if relied on to provide sufficient safeguards for other policies).
<b>Policies which make provision for change but which could have no conceivable effect</b>	Policies or proposals that cannot affect a European site (no impact pathways and hence no effect; for example, proposals for new cycle path several kilometres from the nearest European site) or which cannot undermine the conservation objectives, either alone or in combination, if impact pathways exist (no significant effect).

\* EC, 2000, Managing Natura 2000 sites: the provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC April 2000 at 4.3.2

It must be noted that it is inappropriate to apply a policy classification tool uncritically to all policies of a certain type: there will obviously be some occasions when a policy or similar may have potentially significant effects, despite being of a ‘type’ that would normally be screened out. The criteria in **Table 4.6** are applied critically to the screening of the draft policies within the Local Plan to identify the following policy groups:

- ▶ **‘No effect’ policies:** policies that will have ‘no effect’ (i.e. policies that, if included as drafted, self-evidently would not have any effect on a European site due to the type of policy or its operation; for example, a policy controlling town centre shop signage; a policy setting out sustainable development criteria that developments must meet). Note that ‘no effect’ policies cannot have in combination effects;
- ▶ **‘No likely significant effect’ policies:** policies where impact pathways exist but the effects will not be significant (alone or in combination);
- ▶ **‘Uncertain effect’ policies:** policies where the precise effects on European sites (either alone or in combination) are uncertain, and hence additional investigation (appropriate assessment) or policy modification is required. Note that further investigation will often demonstrate that there is no significant effect or allow suitable mitigation or avoidance measures to be identified to ensure this; and
- ▶ **‘Likely significant effect’ policies:** policies which are likely to have a significant effects (either alone or in combination) and hence which require additional investigation (appropriate assessment) or policy modification. Note that ‘likely significant effect’ policies are more likely to require that the policy be amended, abandoned or re-worked to avoid significant effects.

## Overarching Protective Policies

The screening of the draft policies accounts for overarching or cross-cutting protective policies that may potentially be relied on to ensure that other policies, particularly those that promote or support development but which do not specify the scale or location of that development, do not have significant effects. Note that these policies will not automatically be sufficient to prevent significant effects for all policies, and some policies may require bespoke measures to ensure that significant effects do not occur.

## Draft Policy Review

The review of the draft policies is detailed in **Table 4.8**. This review was originally undertaken during the policy development phase (Regulation 18) to assist LBTH with the drafting of the policies and any appropriate mitigation or avoidance measures; suggestions for policy changes or amendments were made although these were not intended to be prescriptive and a number of approaches for ensuring ‘no significant effects’ would be acceptable (for example, a policy with a potential significant effect could have been abandoned; or modified; or cross-referenced to an over-riding protective policy). The colour coding used in **Table 4.8** is detailed in **Table 4.7** as follows:

**Table 4.7** Colour coding for initial review of policies

	No LSE – policy will not or cannot affect any European sites and can therefore be screened out (subject to brief review of final policy)
	No LSE, but amendments recommended; policies that will not affect any European sites but which could be enhanced or strengthened
	Policy requires changes to avoid significant effects (e.g. minor re-wording; referencing mitigating policies), or effects are uncertain.
	Significant effects likely; policy should be abandoned or re-worked to include specific mitigation (may apply to groups of policies)

Note that the inclusion of a policy in the ‘red’ or ‘yellow’ categories does not mean that significant effects are certain since in many instances the assessments reflected an uncertainty that needs to be explored through further assessment (and it would be possible to undertake an appropriate assessment stage and still conclude (following a further screening) that there will be no significant effects). The review also included an assessment of ‘in combination’ effects between policies. In summary, all of the draft policies are considered ‘no effect’ or ‘no significant effect’ policies, based on the intent and context of the policy and the sensitivities of the relevant European sites.

**Table 4.8** Summary of draft policy review

Policy	Assessment	Rationale
<b>Policy S.SG1</b> <b>Areas of growth and opportunity within Tower Hamlets</b>	No effect	This policy sets out the broad locations and opportunity areas where growth and investment will be targeted over the course of the plan period and the need for development to contribute towards new infrastructure. As noted, the distance of LBTH from any European sites ensures that any spatially-specific policies within the plan are effectively neutral from an HRA perspective (i.e. the location of development is less important than the overall quantum).
<b>Policy S.SG2</b> <b>Delivering sustainable growth in Tower Hamlets</b>	No effect amendments recommended	General statement of policy regards principles of sustainability, so has some protective elements; policy could arguably be strengthened by including references to designated nature conservation sites when setting out the principles of sustainable development (i.e. so that development that has unmitigated significant effects on nature conservation sites is not considered ‘sustainable’).
<b>Policy D.SG3</b> <b>Health impact assessments</b>	No effect	Environmental protection policy confirming the types of development that will require Health Impact Assessment.
<b>Policy D.SG4</b> <b>Construction of new development</b>	No effect; amendments may improve policy performance	General design / guidance criteria. Although the risk to European sites is low due to existing controls and distances from receptors, it was suggested in an earlier iteration of the HRA that the clause “ <i>Consider the impact of construction on the water supply, flood risk and drainage and implement suitable mitigation measures where required</i> ” be modified to reflect the need for public utility capacity to be confirmed available before development proceeds. The Borough Council has indicated that it considers this to be an overly burdensome demand – given responsibility rests both with the utility provider and developer. The need for development to consider cumulative effects, including air quality is noted.

Policy	Assessment	Rationale
<b>Policy D.SG5 'Developer contributions'</b>	No effect	General statement of policy
<b>S. DH1 Delivering high quality design</b>	No effect	General design / guidance criteria.
<b>D. DH2 Attractive streets spaces and public realm</b>	No effect	General design / guidance criteria.
<b>Policy S.DH3 Heritage and the historic environment</b>	No effect	Environmental protection policy.
<b>Policy D.DH4 Shaping and managing views</b>	No effect	Environmental protection policy.
<b>Policy S.DH5 World heritage sites</b>	No effect	Environmental protection policy.
<b>Policy D.DH6 Tall Buildings</b>	No effect	General design / guidance criteria, including designated Tall Building Zones.
<b>Policy D.DH7 Density</b>	No effect	General design / guidance criteria.
<b>Policy D.DH8 Amenity</b>	No effect; amendments may improve policy performance	General design / guidance criteria; however, the caveat 'wherever possible' regards open space weakens the policy. It may be desirable to link this policy aspect to other policies relating to offsetting or developer contributions, to ensure that all developments are providing, or providing access to local public space.
<b>Policy D.DH9 Shopfronts</b>	No effect	General design / guidance criteria.
<b>Policy D.DH10 Advertisements hoardings and signage</b>	No effect	General design / guidance criteria.
<b>Policy D.DH11 Telecommunications</b>	No effect	General design / guidance criteria.
<b>Policy S.H1 Meeting housing needs</b>	No significant effect; amendments may improve policy performance	Policy S.H1 sets out the anticipated housing growth for the borough and preferred locations for the majority of new housing development, which are GLA allocated Opportunity Areas (Lower Lea Valley including the Poplar Riverside Housing Zone; Isle of Dogs and South Poplar; and The City Fringe including Whitechapel). These areas are not on the northern margins of the borough and so have some additional separation from European sites that may be vulnerable to visitor pressure (Epping Forest SAC; Lee Valley SPA; Lee Valley Ramsar), so minimising the likelihood of significant additional pressure. Based on the available data it is unlikely that the quantum of development proposed will result in significant effects due to visitor pressure, although it would be worthwhile adding or strengthening the requirements for public access and space (perhaps explicit linkages to the relevant policies) with a requirement on developers to facilitate access to local public space. Policy D.ES3 on Urban greening and biodiversity has been amended to highlight the potential need for HRA at the project level, including consideration of potential issues associated with recreational pressure.
<b>Policy D.H2 Affordable housing</b>	No effect	General design / guidance criteria.
<b>Policy D.H3 Housing standards and quality</b>	No effect	General design / guidance criteria.
<b>Policy D.H4 Specialist housing</b>	No effect	General design / guidance criteria.

Policy	Assessment	Rationale
<b>Policy D.H5 Gypsies and travellers accommodation</b>	No effect	General design / guidance criteria.
<b>Policy D.H6 Student housing</b>	No effect	General design / guidance criteria.
<b>Policy D.H7 Housing with shared facilities (houses in multiple occupation)</b>	No effect	General design / guidance criteria.
<b>Spatial Policy S.EMP1 Creating investment and jobs</b>	No effect	Policy makes provision for change but will have no conceivable effect; the proposed employment locations are all some distance from the nearest European sites, and no potential effects can be reasonably attributed to the location of employment in these areas. There may be broader effects associated with diffuse air pollution, depending on transport links to these areas and key modes of transport, but the other policies within the plan ensure this small risk is mitigated.
<b>Policy D.EMP2 New employment space</b>	No significant effect	Policy makes provision for change but will have no conceivable effect; the proposed employment locations are all some distance from the nearest European sites, and no potential effects can be reasonably attributed to the location of employment in these areas. There may be broader effects associated with diffuse air pollution, depending on transport links to these areas and key modes of transport, but the other policies within the plan ensure this small risk is mitigated.
<b>Policy D.EMP3 Loss of employment space</b>	No effect	General design / guidance criteria.
<b>Policy D.EMP4 Redevelopment within the borough's employment areas</b>	No effect	General statement of policy.
<b>Policy S.TC1 Supporting the network and hierarchy of centres</b>	No effect	Identifies centres and their position within the town centre hierarchy.
<b>Policy D.TC2 Retail in our town centres</b>	No effect	General design / guidance criteria.
<b>Policy D.TC3 Retail outside our town centres</b>	No effect	General design / guidance criteria.
<b>Policy D.TC4 Financial and professional services</b>	No effect	General design / guidance criteria.
<b>Policy D.TC5 Food, drink, entertainment and the night-time economy</b>	No effect	General design / guidance criteria.
<b>Policy D.TC6 Short-stay accommodation</b>	No effect	General design / guidance criteria.
<b>Policy D.TC7 Markets</b>	No effect	General design / guidance criteria.
<b>Spatial Policy S.CF1 Supporting community facilities</b>	No effect	General statement of policy.
<b>Policy D.CF2 Existing community facilities</b>	No effect	General design / guidance criteria.
<b>Policy D.CF3 New and enhanced community facilities</b>	No effect	General statement of policy.

Policy	Assessment	Rationale
<b>Policy D.CF4 Public Houses</b>	No effect	General statement of policy.
<b>Policy S.OWS1 Creating a network of open spaces</b>	No effect.	General statement of policy; likely to help manage the risk of increased visitor pressure on European sites by ensuring provision / maintenance of local public space for recreation. The policy also sets out a commitment to work with other local authorities to improve access to the strategically important publicly accessible open space, which includes Metropolitan Open Land, the Olympic Park, Lea River Park and the Leaway which will help manage the risk of increased visitor pressure on European sites by providing strategic spaces for recreation.
<b>Policy S.OWS2 Enhancing the network of water spaces</b>	No effect.	Protective policy.
<b>Policy D.OWS3 Open space and green grid networks</b>	No effect.	General statement of policy; likely to help manage the risk of increased visitor pressure on European sites by ensuring provision / maintenance of local public space for recreation.
<b>Policy D.OWS4 Water spaces</b>	No effect.	General statement of policy; likely to help manage the risk of increased visitor pressure on European sites by ensuring provision / maintenance of local public space adjacent to water spaces for recreation and access to water space for a range of uses, including recreation.
<b>S.ES1 Protecting and enhancing our environment</b>	No effect.	Protective policy.
<b>Policy D.ES2 Air quality</b>	No effect;	<p>The policy should help drive a reduction in air pollution, in conjunction with London-wide policies; it should be noted that the policy states that <i>"Development is required to meet or exceed the 'air quality neutral' standard, including promoting the use of low or zero emission transport and reducing the reliance on private motor vehicles"</i>.</p> <p>Given that air quality is the principal pressure identified for Epping Forest SAC it was strongly recommended in a previous iteration of this report that the text of the policy (or supporting text) require that air quality impact assessments consider potential impacts on European sites, particularly Epping Forest SAC, in addition the receptors usually identified, through indirect mechanisms – particularly changes in traffic behaviours or volumes associated with the development; this assessment should take account of potential effects in combination with other developments that may directly or indirectly affect this SAC. The supporting text to D.ES2 has been amended as recommended.</p>

Policy	Assessment	Rationale
<b>Policy D.ES3 Urban greening and biodiversity</b>	No effect; amendments recommended	<p>General statement of policy/Environmental protection policy that now includes reference to some European sites.</p> <p>It was previously recommended that the policy should be reworded to refer to 'European sites', with an appropriate definition within the supporting text, to ensure that it covers the full suite of sites protected by the Habitats or Wild Birds Directives (including SACs and SPAs; Sites of Community Importance' (SCIs); any candidate SAC (cSAC)); and potential SPAs (pSPAs)) or to which these protections are applied as a matter of UK Government policy (possible SACs (pSACs) and listed Ramsar sites). This is particularly relevant given that the closest European site is a Ramsar and SPA. The policy has been amended as recommended.</p> <p>The supporting text to the policy also highlights the potential need for HRA at the project level to include recreational pressure as an issue.</p> <p>The LBTH policy previously considered European sites and SNC collectively under a single set of provisions. The policy has been amended to provide a separate criteria in relation to European sites.</p> <p>In addition – and this is not critical to the HRA – the policy only includes internationally and locally designated nature conservation sites: it was previously recommended that it should reference Sites of Special Scientific Interest also, although it is recognised that there are currently none in LBTH. The Council have amended the Local Plan to indicate the presence of a SSSI at Epping Forest.</p>
<b>Policy D.ES4 Flood risk</b>	No effect	General design / guidance criteria.
<b>Policy D.ES5 Sustainable drainage</b>	No effect	Environmental protection policy.
<b>Policy D.ES6 Sustainable water management</b>	No effect	General design / guidance criteria.
<b>Policy D.ES7 A zero carbon borough</b>	No effect	General design / guidance criteria.
<b>Policy D.ES8 Contaminated land and storage of hazardous substances</b>	No effect	Environmental protection policy.
<b>Policy D.ES9 Noise and vibration</b>	No effect	Environmental protection policy.
<b>Policy D.ES10 Overheating</b>	No effect	General design / guidance criteria.
<b>Policy S.MW1 Managing our waste</b>	No effect	<p>General statement of policy identifying safeguarded waste management facilities and areas of search for new sites.</p> <p>The safeguarded waste management sites and areas of search will not significantly affect any European sites, other than potentially through diffuse / cumulative air pollution issues (which are controlled through other policies, including D.SG4 of the Local Plan and Policy 7.19 of the London Plan). The requirement for development to be 'air quality neutral' would also apply to this form of development.</p>
<b>Policy D.MW2 New and enhanced waste facilities</b>	No significant effect	General design / guidance criteria relating to the provision of new and enhanced waste management facilities that includes criteria relating to air quality and transport.
<b>Policy D.MW3 Waste collection facilities in new development</b>	No effect	General design / guidance criteria relating to the implementation of the waste management hierarchy in all developments.

Policy	Assessment	Rationale
<b>S.TR1 Sustainable travel</b>	No effect	General design / guidance criteria; part of a suite of policies likely to help manage air quality changes associated with new development in the borough.
<b>Policy D.TR2 Impacts on the transport network</b>	No effect	General design / guidance criteria.
<b>Policy D.TR3 Parking and permit-free</b>	No effect	General design / guidance criteria.
<b>Policy D.TR4 Sustainable delivery and servicing</b>	No effect	The policy should help drive a reduction in air pollution, in conjunction with London-wide policies.

## 4.5 Additional ‘In Combination’ Screening Information – Air Quality

Annex A summarises the results of a broad assessment of potential ‘in combination’ effects of the LBTH plan with other plans and programmes. Based on this, and the baseline and assessment information provided in the previous sections, it is clear that the main risk of ‘in combination’ effects is associated with air quality impacts (N-deposition) on Epping Forest SAC and (to a lesser extent) the Lea Valley SPA and Lea Valley Ramsar sites. Other ‘in combination’ quantum of development effects (e.g. on water availability or sewerage capacity) are addressed by existing regulatory regimes that are subject to HRA, and the policies of the LBTH plan include measures that will assist in this regard.

As noted (see Section 4.1), current case-practice suggests that HRAs of local plans “*can only be concerned with locally emitted and short range locally acting pollutants*” as wider diffuse pollution is beyond the control or remit of the authority. This is arguably correct, since trans-boundary air pollution can only be realistically addressed by national legislation or higher-tier plans, policies or strategies. This does not mean, however, that consideration of air quality effects should be limited to specific ‘sources’ within the LPA boundary (and hence under LPA control); in particular, a consequent effect of development or growth may be changes in traffic behaviour or volumes on road outside the LPA boundary, which could affect European sites alone or in combination.

The Draft Local Plan provides suitable policies that will minimise the contribution of plan-supported development to overall diffuse pollution, particularly through adoption of the requirements of higher-tier plans and strategies, including the London Plan and Mayoral strategies, and the requirement in Policy D.ES2 that “*Development is required to meet or exceed the ‘air quality neutral’ standard*”. The requirements of the London Plan and Mayoral Strategies are summarised in Box 2.

**Box 2 – Summary of the London Plan and Mayoral Strategy requirements****The London Plan**

Policy 7.14 'Improving Air Quality' states that development proposals should "...be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs))." The requirement for development within Greater London to be at least 'air quality neutral' is relevant to this assessment, including the consideration of in-combination effects, given the sensitivity of some European sites within the study area to air borne pollution.

**The Mayor's Air Quality Strategy**

The Air Quality Strategy (2010) sets out a range of measures to improve air quality and work **towards** the achievement of limit values within Greater London, recognising that around 40 per cent of NO<sub>2</sub> pollution comes from emission sources outside London. Transport is a significant source of NO<sub>2</sub> pollution and the strategy sets out measures to reduce emissions by:

- ▶ Encouraging sustainable travel behaviour;
- ▶ Promoting technological change and cleaner vehicles;
- ▶ Reducing emissions from the public transport and public transport fleets; and
- ▶ Using emissions control schemes to reduce emissions from private vehicles.
- ▶ The strategy seeks to reduce emissions from homes, business and industry by:
- ▶ Promoting and delivering energy efficiency schemes;
- ▶ Using the planning system to reduce emissions from new developments; and
- ▶ Updating and implementing best practice on construction and demolition

**The Mayor's Transport Strategy**

The Transport Strategy (2010) highlights that the growth of London will lead to more trips, up from 24 million per day within London to more than 27 million in 2031. The Strategy highlights the need to encourage a shift away from the private car, smoothing traffic flow, continuing to encourage cycling and walking, better transport interchanges, mixed use development, improved use of technology to allow people to work and shop from home and making more use of London's Blue Ribbon Network for passengers and freight. The strategy also seeks to improve interchange between radial and orbital rail lines and between modes in order to facilitate orbital travel. The concept of strategic interchanges to enable improved interchange facilities are proposed. The measures put forward in the Strategy are identified as delivering reductions in pollutants from road transport when compared to the baseline.

Whilst the 'air quality neutral' requirement is likely to ensure that significant effects do not occur it is recommended that the text of the policy (or supporting text) require that air quality impact assessments consider potential impacts on European sites, particularly Epping Forest SAC and the potential effects through consequent increases in traffic volumes outside the LPA area.

## 5. Draft Plan Assessment Conclusions

### 5.1 Summary of Assessment Key Conclusions

The HRA 'screening' undertaken has reviewed the available data and the Draft Local Plan. The initial assessment conclusion is that the Local Plan, if delivered as per the draft, will have no significant effects (alone or in combination) on any European sites due to either an absence of impact pathways; policy controls within the plan (and at the Greater London level) that can be relied on to ensure significant effects are avoided; or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent.

However, Epping Forest SAC, Lee Valley SPA and Lee Valley Ramsar have features that are potentially sensitive to the outcomes of the Local Plan, particularly via visitor pressure or reduced air quality which are aspects that are known to be currently affecting Epping Forest SAC in particular. It is considered that these sites will have only limited exposure to these effects as a result of the plan, although it is appropriate for the plan to minimise the residual risk through appropriate policy measures designed to minimise the risk of exposure occurring (e.g. air quality assessment requirements or policy controls on locally accessible public space). Therefore, the policy review summarised in **Table 4.8** identifies policies that would benefit from amendments to maximise their effectiveness in reducing residual risk. In particular:

- ▶ Air Quality: Policy 7.14 of the London Plan requires development to be air quality neutral and Policy D.ES2 of the Draft Local Plan also requires this. It was previously recommended that Policy D.ES2 'Air Quality' be used to help ensure that development arising from the LBTH Local Plan plays a full part (with other plans) in reducing diffuse air pollution that may affect Epping Forest SAC. It was suggested that the text of the policy (or supporting text) require that air quality impact assessments consider potential impacts on European sites, particularly Epping Forest SAC and the potential effects through consequent increases in traffic volumes outside the LPA area. The supporting text to D.ES2 has been amended as suggested. Other policy controls and options may be available (NE and the EA will be able to provide further guidance in this regard, particularly as the Epping Forest Council Local Plan is being prepared on a similar timescale to LBTH's Local Plan); and
- ▶ Public Access: It is unlikely that visitor pressure on Epping Forest SAC will increase significantly as a result of the LBTH Local Plan, such that the LBTH Local Plan that need include specific mitigating measures (e.g. SANGS etc.), and existing and planned public space in and near the LBTH area (e.g. The Olympic Park and the Lea River Park) are likely to provide some moderating effects in any case. The policy requirements for LBTH can therefore be more holistic, by ensuring that policies and development controls collectively provide the local recreational amenities (e.g. traffic-free walks / paths; green networks; etc) that are likely to reduce the incentive to regularly travel to Epping Forest SAC. This is largely achieved, although more emphasis or obligation should be placed on developers to clearly demonstrate how policies S.OWS1, S.OWS2 and D.OWS3 are met as part of their developments in order to demonstrate the avoidance of potentially significant or adverse effects on European sites. Given the distance from the Borough to the Epping Forest SAC, the fact that most visitors are more local to the SAC and the potential for access to be managed, e.g. through the provision of designated parking and localised recreational and visitor facilities, the potential for significant in-combination effects on European sites to arise from increased visitor pressure is considered unlikely. The delivery of new strategic spaces in the Borough will also provide further mitigation, including the Lea River Park, the Leaway and the Olympic Park. An amendment to the supporting text to Policy D.ES3 on urban greening and biodiversity has however been made to recognise the potential need for HRA at the project level to consider the issue of recreational pressure; and

- Water supply: Although the risk to European sites is low due to existing controls and distances from receptors, it is suggested that the following clause in D.SG4 “*Consider the impact of construction on the water supply, flood risk and drainage and implement suitable mitigation measures where required*” be modified to reflect the need for public utility capacity to be confirmed available before development proceeds. The Borough Council has indicated that it considers this to be an overly burdensome demand – given responsibility rests both with the utility provider and developer.

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## Annex A

### Review of plans for 'in combination' effects

Table A.1 Summary of review of plans for 'in combination' effects

Plan	Summary	Likely net effect of plan on European sites (based on plan HRAs)	LSE with LBTH Plan?	Notes
<b>Thames Water (2014) Final Water Resources Management Plan</b>	<p>Water companies in England and Wales are required to produce a Water Resources Management Plan that sets out how they aim to maintain water supplies over a 25-year period. The current Water Resources Management Plan was published in 2014.</p> <p>The Thames Water WRMP demonstrates how in the medium to long new resources intend to be developed, leakage tackled and sensible water use promoted through metering and water efficiency campaigns. The long term strategy is to increase the robustness of the water resources network to climate change and reduce unsustainable abstractions.</p>	No significant effect.	No	TW's WRMP for the next 25 years explicitly accounts for any reductions in abstraction that are required to safeguard European sites (see Section 3) and for the growth predicted by LBTH and other LPAs in its forecasting. Therefore, the future water resource requirements of LBTH are factored into the abstraction regime, such that they will not affect European sites (i.e. the growth provided for by the LBTH plan is in line with TW predictions and will not increase water resources pressure on any European sites, alone or in combination).
<b>River Basin Management Plan Thames River Basin District</b>	<p>The plan focuses on the protection, improvement and sustainable use of the water environment. River basin management is the approach the Environment Agency is using to ensure combined efforts from organisations and individuals in order to achieve the improvement needed in the Thames River Basin District. The plan addresses the main issues for the water environment and the actions needed to deal with them. Measures to achieve good status for water bodies and to prevent deterioration may be carried out by a range of 'co-deliverers' including local planning authorities and developers. NB 2015 represents the start of the second phase of the River Basin Management Plan. 2027 is the final deadline for reaching good status under WFD.</p> <ul style="list-style-type: none"> <li>▶ By 2015, 22% of surface waters (rivers, lakes, estuaries and coastal waters) are going to improve for at least one biological, chemical or physical element.</li> <li>▶ 25% of surface waters will be at good or better ecological status.</li> <li>▶ 17% of groundwater bodies will be at good overall status by 2015.</li> <li>▶ At least 30% of assessed surface waters will be at good or better biological quality by 2015.</li> </ul>	No significant effect	No	The plans will be complementary and the policies within both plans do not create a scenario where there is insufficient flexibility at the project stage to allow significant effects to be avoided.

Plan	Summary	Likely net effect of plan on European sites (based on plan HRAs)	LSE with LBTH Plan?	Notes
<b>Thames Estuary 2100 Action Plan: Managing Flood Risk Through London and the Thames Estuary (EA, 2012)</b>	<p>For the first 25 years (2010-2035), the Strategy seeks to:</p> <ul style="list-style-type: none"> <li>▶ Continue to maintain the current flood defence system – including planned improvements;</li> <li>▶ Ensure that effective floodplain management (emergency and spatial planning) is in place across the estuary;</li> <li>▶ Safeguard areas that will be required for future changes to the flood defences;</li> <li>▶ Monitor change indicators including sea level rise and climate change and review the Plan as required</li> </ul>	No adverse effect on sites also exposed to effects of LBTH plan.	No	None of the sites exposed to potentially significant changes as a result of this plan will be directly affected by the LBTH proposals / allocations so in combination risks are limited.
<b>Thames Catchment Flood Management Plan (EA, 2009)</b>	<p>Catchment Flood Management Plans helps to understand the scale and extent of flooding now and in the future, and set policies for managing flood risk within the catchment. Catchment Flood Management Plans should be used to inform planning and decision making by key stakeholders.</p> <p>Catchment Flood Management Plans aim to promote more sustainable approaches to managing flood risk. The policies identified in the Catchment Flood Management Plan will be delivered through a combination of different approaches. Together with our partners, we will implement these approaches through a range of delivery plans, projects and actions.</p>	No adverse effect on sites also exposed to effects of LBTH plan.	No	None of the sites exposed to potentially significant changes as a result of this plan will be directly affected by the LBTH proposals / allocations so in combination risks are limited.
<b>Essex Transport Strategy; The Local Transport Plan for Essex (2011)</b>	<p>This is the third Local Transport Plan and has been produced to respond to the needs of the communities in Essex.</p> <p>The vision of the Plan is “for a transport strategy that supports sustainable economic growth and helps deliver the best quality of life for the residents of Essex”.</p> <p>The Plan sets five outcomes which comprise:</p> <ul style="list-style-type: none"> <li>▶ Provide connectivity for Essex communities and international gateways to support sustainable economic growth and regeneration.</li> <li>▶ Reduce carbon dioxide emissions and improve air quality through lifestyle changes, innovation and technology.</li> <li>▶ Improve safety on the transport network and enhance and promote a safe travelling environment.</li> <li>▶ Secure and maintain all transport assets to an appropriate standard and ensure that the network is available for use.</li> <li>▶ Provide sustainable access and travel choice for Essex residents to help create sustainable communities”.</li> </ul>	No significant effect	No	CCC plan is complementary and the policies within both plans do not create a scenario where specific developments cannot be delivered due to the risk of significant effects.

Plan	Summary	Likely net effect of plan on European sites (based on plan HRAs)	LSE with LBTH Plan?	Notes
<b>North Essex Catchment Flood Management Plan Summary Report (2009)</b>	<p>The aim of the CFMP is to “understand the scale and extent of flooding now and in the future, and set policies for managing flood risk within the catchment”.</p> <p>The CFMP “should be used to inform planning and decision-making by key stakeholders” such as the Environment Agency, regional/local authorities, internal drainage boards, transportation planners, land owners/managers, the public and local businesses.</p> <p>The CFMP identifies the following objectives:</p> <ul style="list-style-type: none"> <li>▶ Where possible, flood risk should be managed by storing water on the floodplain upstream of Chelmsford.</li> <li>▶ Redevelopment of floodplain areas is an opportunity to increase their flood resilience.</li> <li>▶ Flood awareness plans will be used to manage the consequences of flooding.</li> </ul>	No adverse effect on sites also exposed to effects of CCC plan	No	None of the sites exposed to potentially significant effects as a result of the CCC plan will be significantly affected by the CFMP so in combination risks are limited.
<b>Hackney Council Local Plan</b>	Comprises the Core Strategy (adopted November 2010), the development management local plan (adopted July 2015), the site allocations local plan (proposed to be adopted July 2016) and adopted area action plans. HC currently consulting on new Local Plan.	No significant effects	No	The principal risk of significant in combination effects is due to air quality effects on Epping Forest SAC, and recreational pressure on Epping Forest SAC and the Lea Valley SPA / Ramsar. The HRA of the HC CS concluded that this policy document contained sufficient safeguards re. these pathways and the LBTH plan also has sufficient safeguards to ensure no significant effect in combination with the residual effects of the HC plan.
<b>Newham Local Plan</b>	The Newham local Plan comprises the Core Strategy (2012) and the Local Plan Detailed Sites and Policies Development Plan Document The Detailed Sites and Policies DPD (2016).	No significant effects	No	The principal risk of significant in combination effects is due to air quality effects on Epping Forest SAC, and recreational pressure on Epping Forest SAC and the Lea Valley SPA / Ramsar. The HRA of the NC CS concluded that this policy document contained sufficient safeguards re. these pathways and the LBTH plan also has sufficient safeguards to ensure no significant effect in combination with the residual effects of the NC plan.

Plan	Summary	Likely net effect of plan on European sites (based on plan HRAs)	LSE with LBTH Plan?	Notes
<b>Redbridge Local Plan 2015 - 2030</b>	Plan currently undergoing examination; contains policies and site allocations.	No significant effects	No	The principal risk of significant in combination effects is due to air quality effects on Epping Forest SAC, and recreational pressure on Epping Forest SAC and the Lea Valley SPA / Ramsar. The HRA of the RC CS concluded that this policy document contained sufficient safeguards re. these pathways and the LBTH plan also has sufficient safeguards to ensure no significant effect in combination with the residual effects of the WFC plan.
<b>Waltham Forest Core Strategy (2012)</b>	Contains policies and site allocations.	No significant effects	No	The principal risk of significant in combination effects is due to air quality effects on Epping Forest SAC, and recreational pressure on Epping Forest SAC and the Lea Valley SPA / Ramsar. The HRA of the WFC CS concluded that this policy document contained sufficient safeguards re. these pathways and the LBTH plan also has sufficient safeguards to ensure no significant effect in combination with the residual effects of the WFC plan.
<b>Haringey Local Plan</b>	Comprises the Strategic Policies DPD (2013) and the saved UDP policies; currently being amended following inspection.	No significant effects	No	The principal risk of significant in combination effects is due to air quality effects on Epping Forest SAC, and recreational pressure on Epping Forest SAC and the Lea Valley SPA / Ramsar. The HRA of the HC CS concluded that this policy document contained sufficient safeguards re. these pathways and the LBTH plan also has sufficient safeguards to ensure no significant effect in combination with the residual effects of the HC plan.
<b>Other Local Plans</b>	Other local plans	No significant effects	No	None of the other local plans within London identify significant effects on European sites





## Appendix J

### Policy Options Matrix



## Appendix J: Policy Options Matrix from the Regulation 18 Local Plan

Chapter/Topic	Policy No. (Regulation 18 Local Plan)	Options	Council's Preferred option and rationale	Implications for the IIA
Ch.1: Introduction	N/A	N/A		
Ch.2: Context	N/A	N/A		
Ch.3: Vision & Objectives		No reasonable alternative policy options have been identified. This Local Plan must be in general conformity with the London Plan and the NPPF.		None but see comments under Chapter 5.
Ch.4.0. Draft Policies	N/A	N/A		
Ch.4.1: Sustainable Growth in Tower Hamlets		No reasonable alternative policy options have been identified. This Local Plan must be in general conformity with the London Plan and the NPPF.		None but see comments under Chapter 5.
Ch.4.2: Design and Historic Environment				
Building Heights	DH5	<ul style="list-style-type: none"> <li>1. Identify suitable tall building zones in the CAZ, Canary Wharf Major Centre and Activity Area and apply a step down approach from the zone.</li> <li>2. Maintain existing approach to managing building heights in accordance with the town centre hierarchy.</li> </ul>	<b>Option 1</b> Increasingly developments have come forward in the Borough for tall buildings that do not respect their context and have a negative effect on character.  In order to manage this and guide development, the Council has introduced Tall Buildings Zones to make it clear where it considers tall buildings appropriate and where they are considered inappropriate.	Policy 7.7 of the London Plan 'Location and design of tall and large buildings' states that " <i>Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.</i> "  Both options accord with Policy 7.7 of the London Plan and are therefore considered to be reasonable alternatives.  Both options 1 and 2 have been assessed.
Density	DH6	<ul style="list-style-type: none"> <li>1. Provide further guidance to maintain densities that exceed the London Plan's Density Matrix</li> <li>2. Adopt a locally specific density matrix to manage the scale of development.</li> </ul>	<b>Option 1</b> This option would be in conformity with the London Plan but provide further detail to manage the scale of	Policy 3.4 of the London Plan 'Optimising Housing Potential' development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals

Chapter/Topic	Policy No. (Regulation 18 Local Plan)	Options	Council's Preferred option and rationale	Implications for the IIA
			development.	<p>which compromise this policy should be resisted.</p> <p>Option 1 accords with the London Plan and is therefore considered to be reasonable. Arguably Option 2 would not be, depending on how different the matrix was from that in the London Plan and the justification for it. Both options have been assessed on a precautionary basis.</p>
Ch.4.3:Housing in Tower Hamlets				
Mixed and Balanced Communities	Policy H2.1	<ol style="list-style-type: none"> <li>1. Adopt a London Plan compliant tenure split of 60/40 for social and affordable rent and intermediate rent or sale respectively.</li> <li>2. Maintain existing tenure split policy of 70/30 for social and affordable rent and intermediate rent or sale respectively.</li> <li>3. Adopt a new tenure split of 80/20 for social and affordable rent and intermediate rent or sale respectively.</li> </ol>	<b>Option 2</b> <p>The LBTH SHMA 2014 shows an objectively assessed need for the new housing stock to comprise 62.3% social rented housing and 4.3% intermediate housing. These figures are substantially different from the 2013 London Strategic Housing Market Assessment.</p>	<p>Policy 3.11 of the London Plan 'Affordable Housing Targets' is relevant here.</p> <p>The supporting text to the policy states (paragraph 3.69): "<i>The Mayor will engage with boroughs individually to enable them to set local affordable housing targets which are in general conformity with the London Plan's strategic targets.</i>"</p> <p>All three options are considered to be reasonable and have been assessed.</p>
Mixed and Balanced Communities	Policy H2.5	<ol style="list-style-type: none"> <li>1. Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds across all three tenures (social and affordable / intermediate and market)</li> <li>2. Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds across all affordable housing tenures (social and affordable / intermediate).</li> <li>3. Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds in the social and affordable tenure only.</li> </ol>	<b>Option 2</b> <p>The LBTH SHMA 2014 identifies that the majority of Tower Hamlets need is in the affordable sector. As such the delivery of this form of housing is a priority for the borough.</p>	<p>Policy 3.4 of the London Plan seeks to optimise housing potential. The supporting text at paragraph 3.29 states: <i>The form of housing output should be determined primarily by an assessment of housing requirements and not by assumptions as to the built form of the development. While there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good public transport accessibility (measured by Public Transport Accessibility Levels [PTALs]), and lower density development is generally most appropriate for family housing.</i></p>

Chapter/Topic	Policy No. (Regulation 18 Local Plan)	Options	Council's Preferred option and rationale	Implications for the IIA

<b>Chapter/Topic</b>	<b>Policy</b>	<b>Options</b>	<b>Council's Preferred option and rationale</b>	<b>Implications for the IIA</b>
Housing Quality and Standards	Policy H3.1b	<ol style="list-style-type: none"> <li>1. To apply the nationally described space standards for floor to ceiling height of 2.3 m</li> <li>2. To apply the London Plan approach of strongly encouraging a floor to ceiling height of 2.5m</li> <li>3. To require a local standard of 2.5m floor to ceiling height</li> </ol>	<b>Option 3</b>  The borough is the second most dense borough in London and the dominant form of new housing is flatted. To date, a floor to ceiling height of 2.5m has been deliverable. These considerations alongside health and wellbeing considerations inform the rational for Option 3.	<p>Policy 3.5 of the London Plan is accompanied by Table 3.3 which sets out minimum space standards for new dwellings.</p> <p>The notes to Table 3.3 of Table 3.3 of the London Plan note that: <i>the nationally described space standard sets a minimum ceiling height of 2.3 metres for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.</i></p> <p>Option 1 is not considered to be a reasonable alternative as, based on the above, it would not be compliant with Policy 3.5 of the London Plan. Option 1 has therefore not been assessed. Options 2 and 3 are considered to be reasonable and have been assessed.</p>
<b>Ch.4.4:Economy and Jobs in Tower Hamlets</b>				
Employment Locations	Policy EMP4.1	<ol style="list-style-type: none"> <li>1. To retain existing prohibition of housing within Preferred Office Locations (POLs)</li> <li>2. To allow housing within POLs</li> </ol>	<b>Option 1</b>  The Council's draft Employment Land Review supports this position, along with the GLA's CAZ SPG	<p>In March 2016 permitted development rights for office to residential change of use became permanent. The Central Activities Zone, the Canary Wharf area and Tech City, have been exempted from the permitted development rights and this will remain the case until 30<sup>th</sup> May 2019.</p> <p>Option 1 is compliant with the GLAs Central Activities Zone (CAZ) Supplementary Planning Document (SPD) which states that residential use is not appropriate within the 'commercial cores.' This includes the Preferred Office Locations (POLs).</p>

				It is assumed for the purpose of this SA that Option 2 would involve the loss of office space without it being replaced, this would be contrary to London Plan Policy 4.3 but it has been assessed on a precautionary basis.
Employment Locations	EMP4.2ai	1. To maintain existing 12 month period for evidence of marketing for loss of employment space 2. To extend 12 month period of evidence to 24 months	<b>Option 2</b> The need to maintain employment floorspace to meet needs means that a greater period of marketing evidence is required	Policy .4.4 of the London Plan 'Managing Industrial Land and Premises' requires a rigorous approach to industrial land management to ensure a sufficient stock of land and premises.  Both approaches are consistent with policy and have been assessed.
<b>Ch.4.5: Town Centres in Tower Hamlets</b>				
Protecting and Enhancing Our Town Centres	TC2.1	1. Maintain existing town centre designations 2. Identify additional town centres and consider re-designation of existing town centres	<b>Option 2</b> Additional town centres have been identified to strengthen the borough's network of town centres and retail provision, and to support future growth	Policy 2.15 of the London Plan 'town Centres states:  Identified deficiencies in the network of town centres can be addressed by promoting centres to function at a higher level in the hierarchy or by designating new centres where necessary.  Both options have been assessed.
	TC2.2a & b	To consider an appropriate percentage of retail (A1) units within primary and secondary frontages: 1. 70/30 2. 60/40 3. No minimum within secondary frontages	<b>Option 2</b> This is to ensure a dominance of A1 units within the primary shopping areas without over concentrating A1 units in such areas, and to ensure a range of uses throughout the wider town centres.	London Plan Policy 4.8 'Supporting A Successful And Diverse Retail Sector And Related Facilities And Services' states that LDFs should take a proactive approach to planning for retail and related facilities and active and manage clusters of uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan.  All options are considered reasonable and have been assessed.
Protecting and Enhancing Retail in our Town Centres	TC3.1aii	a. Maintain the existing 12 month period for evidence where loss of A1 retail is proposed b. Extend period to 18 or 24 months	<b>Option 1</b> It is considered that the existing requirement is sufficient, and where A1 uses are genuinely unviable	London Plan Policy 4.8 'Supporting A Successful And Diverse Retail Sector And Related Facilities And Services.'  Both options are considered reasonable and

			having units vacant for a longer period could be counter-productive to ensuring the vitality and viability of the town centre.	have been assessed.
<b>Ch.4.6: Community, Culture and Social Facilities</b>		No reasonable alternative policy options have been identified. This Local Plan must be in general conformity with the London Plan and the NPPF.		Noted.
<b>Ch.4.7: Open Spaces and Water Spaces in Tower Hamlets</b>		No reasonable alternative policy options have been identified. This Local Plan must be in general conformity with the London Plan and the NPPF.		Noted.

<b>Chapter/Topic</b>	<b>Policy</b>	<b>Options</b>	<b>Council's Preferred option and rationale</b>	<b>Implications for the IIA</b>
<b>Ch.4.8: Environmental Sustainability</b>	ES7. 2	<ul style="list-style-type: none"> <li>1. To continue to safeguard licensed waste sites as currently in the Managing Development Document (MDD).</li> <li>2. To safeguard suitable waste sites as identified in the Waste Management Evidence Base.</li> </ul>	<b>Option 2</b>  Since the development of the MDD, some waste sites have not renewed their waste license and have been subject to strategic and local development pressure with the result that their suitability has altered.	London Plan Policy 5.17 'Waste Capacity' states (H): If, for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved.  Both approaches could be reasonable so long as any loss in capacity was replaced. Both options have therefore been assessed.
Achieving a Zero Carbon Borough	ES6.1	<ul style="list-style-type: none"> <li>1. Require residential and non-residential development (by 2016 and 2019 respectively) to achieve zero carbon with a minimum 45% reduction on-site. (Current Local Plan Policy)</li> <li>2. Require residential and non-residential development (by 2016 and 2019 respectively) to achieve zero carbon with a minimum 35% reduction on-site. (Current London Plan Policy)</li> </ul>	Require residential and non-residential development (by 2016 and 2019 respectively) to achieve zero carbon with a minimum 45% reduction on-site. (Current Local Plan Policy).  In order to contribute to meet the London Plan and Strategic Objective 12 target of a 60% reduction of carbon emissions (below the 1990 level) by 2025, Tower Hamlets needs to reduce CO2 emissions per person significantly more than most other London boroughs, as Tower	London Plan Policy 5.1 'Climate Change Mitigation' states:  The Mayor seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. It is expected that the GLA Group, London boroughs and other organisations will contribute to meeting this strategic reduction target, and the GLA will monitor progress towards its achievement annually.  The Mayors Housing SPD states at 2.3.57: The London Plan policy seeking 'zero carbon' homes remains in place and was not changed by the recent Minor Alterations to the London Plan.

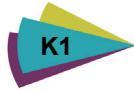
			Hamlets is currently the third worst performing borough within the capital <sup>1</sup> . This policy maintains the Council's policy trajectory which has required progressive reductions in developments' carbon emissions.	Both options are considered reasonable and have been assessed.
<b>Ch.4.9: Transport and connectivity in Tower Hamlets</b>				
Car parking standards (Appendix Two)	TRN3.1 Parking and Permit-free	1. Increase to London Plan standards 2. Maintain current MDD standards (lower than London Plan) 3. Reduce standards	<b>Option 3</b>  This is to better reflect the borough's unique local characteristics, relatively high levels of public transport accessibility, the level of parking stress and highway congestion within the borough.	London Plan Policy 6.13 'Parking' states:  <i>"The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use."</i>  It continues: <i>"the maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards in DPDs."</i>  All three options are considered reasonable and have been assessed.
Cycle parking standards (Appendix Two)	TRN3.5 Parking and Permit-free	1. London Plan standards 2. Maintain current MDD standards	<b>Option 2</b>  In response to the tightened car parking standards proposed for residential and office uses, it is necessary for the corresponding minimum cycling parking standards to ensure those developments provide good quality and sufficient cycle parking to encourage the potential for growth in cycling journeys to be realised.	London Plan Policy 6.13 'Parking' states in relation to cycling: <i>"meet the minimum cycle parking standards set out in Table 6.3"</i>  Both options are considered reasonable and have been assessed.
<b>Ch.4.10: Developer Contributions</b>		No reasonable alternative policy options have been identified. This Local Plan must be in general conformity with the London Plan and the NPPF.		Noted.
<b>Ch.5: Delivering</b>				

<sup>1</sup> National Statistics, UK local authority and regional carbon dioxide emissions national statistics: 2005-2014, 2016

the Vision through Place Making				
Sub Areas	DP1 Delivering Place Making	<ul style="list-style-type: none"> <li>1. Maintain the existing 24 places</li> <li>2. Take forward the GLAs designated Opportunity Areas as sub areas</li> <li>3. Merge Option 1 and 2 and designate the remaining part of the borough as the central sub-area.</li> </ul>	<p><b>Option 3</b></p> <p>Given the level of growth in the borough, it is essential that growth and infrastructure provision is coordinated on a strategic level to ensure it is directed in the appropriate locations and delivers liveable and sustainable communities.</p> <p>However, whilst planning at a strategic level, it is important to reflect the distinct character of the existing places as an opportunity to understand and respond to the intricacies that shape Tower Hamlets at a local level.</p>	The main IIA report considered two options, effectively options 1 and 3. For the sake of consistency and transparency Option 2 has also been assessed.
Ch.6 Appendices	N/A			Noted.







## Appendix K SA of Policy Options



SA Objective	Commentary	Option 1 Tall Building Zones	Option 2 Manage Building Heights in accordance with town Centre Hierarchy
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between either of the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>Both options could contribute towards liveable neighbourhoods by ensuring that development is of an appropriate scale. There could be pressure for taller buildings in town centres under option 2, which could impact on liveability hence some uncertainty is identified.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+/?
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between either of the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1 Tall Building Zones	Option 2 Manage Building Heights in accordance with town Centre Hierarchy
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>Both options could result in the provision of housing, depending on the mix of uses proposed.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b></p> <p>Both options could result in the provision of development within areas of good public transport accessibility performance of both options is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between either of the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1 Tall Building Zones	Option 2 Manage Building Heights in accordance with town Centre Hierarchy
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>Both options could include opportunities for employment, depending on the mix of uses proposed, which could contribute to this objective, however the objective could also be achieved through other forms of development. On balance the performance of each option is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>DH5 directs Tall Building proposals to designated Tall Building Clusters. This could help create clusters of firms that desire such a location, it is uncertain how relevant this would be as a locational factor so a minor positive effect has been recorded. Option 2 might lead to a more dispersed approach and therefore achievement of this objective is judged to be uncertain.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>Uncertainty around the importance of clustering of tall buildings as a driver for economic activity identified.</p>	+	+/?
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral as both options could lead to developments that promote diverse and economically thriving town centres.</p> <p><b>Mitigation</b></p> <p>None required.</p>	~	~

SA Objective	Commentary	Option 1 Tall Building Zones	Option 2 Manage Building Heights in accordance with town Centre Hierarchy
	<p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>		
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b> Directing tall buildings to identified zones and requiring them to step down towards the edge of a specified area will contribute to this objective. Managing the height of both options could require buildings to be of a height, scale, mass and volume that are proportionate to location etc. about this could be easier to achieve in the tall building zones.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+/?
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral as both options could include provision of open space.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral as both options could be pursued having regard to issues associated with the urban heat island effect, micro climate etc.</p>	~	~

SA Objective	Commentary	Option 1 Tall Building Zones	Option 2 Manage Building Heights in accordance with town Centre Hierarchy
respond to the impacts of climate change.	<p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>		
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b> Policy DH5 sets out criteria to assess the acceptability of tall building proposals, including specifically a requirement to avoid adverse impacts on biodiversity. This would safeguard ecological interests, although taking account of the narrow scope of this policy in relation to biodiversity, Option 2 could include the same sort of considerations so performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~

SA Objective	Commentary	Option 1 Tall Building Zones	Option 2 Manage Building Heights in accordance with town Centre Hierarchy
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral as both options would be likely to result in development in flood risk areas.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral as both options could contribute to the objective through the re-use of land and buildings and include criteria around presenting a human scale of development at the street level.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Further Guidance on densities	Option 2: Local Density Matrix
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b> Increased densities can impact on individual quality of life through increased disturbance and disruption. Policy DH6 cross references the density ranges in the London Plan and requires that development will exceed minimum design standards where higher densities are proposed. A minor positive effect is therefore anticipated.  A local density matrix could have a similar effect depending on the detail.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+/?
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None identified</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~

SA Objective	Commentary	Option 1: Further Guidance on densities	Option 2: Local Density Matrix
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~

SA Objective	Commentary	Option 1: Further Guidance on densities	Option 2: Local Density Matrix
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Further Guidance on densities	Option 2: Local Density Matrix
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>A policy on density would contribute to this objective by ensuring that development takes account of the location and existing character. Both options could contribute to this objective but the outcome of option 2 is uncertain in the absence of more detail on the content of a local density matrix.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+/?
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Further Guidance on densities	Option 2: Local Density Matrix
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None required.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None required.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None required.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~

SA Objective	Commentary	Option 1: Further Guidance on densities	Option 2: Local Density Matrix
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral</p> <p><b>Mitigation</b>            None required.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~

SA Objective	Commentary	Option 1: 60/40 split for social and affordable rent and intermediate rent or sale.	Option 2: 70/30 split for social and affordable rent and intermediate rent or sale	Option 3: 80/20 split for social and affordable rent and intermediate rent or sale.
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>All options would make a significant contribution to the achievement of this objective. Option 1 would make a significant contribution but given the level of need identified in the SHMA an uncertainty has been indicated to reflect the fact that it would not reflect local needs.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++/?	++	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~

SA Objective	Commentary	Option 1: 60/40 split for social and affordable rent and intermediate rent or sale.	Option 2: 70/30 split for social and affordable rent and intermediate rent or sale	Option 3: 80/20 split for social and affordable rent and intermediate rent or sale.
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>The provision of affordable housing will contribute to this objective. Option 1 would make a significant contribution but given the level of need identified in the SHMA an uncertainty has been indicated to reflect the fact that it would not reflect local needs.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++/?	++	++
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>The options would result in the provision of affordable housing. Option 1 would make a significant contribution but given the level of need identified in the SHMA an uncertainty has been indicated to reflect the fact that it would not reflect local needs.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++/?	++	++

SA Objective	Commentary	Option 1: 60/40 split for social and affordable rent and intermediate rent or sale.	Option 2: 70/30 split for social and affordable rent and intermediate rent or sale	Option 3: 80/20 split for social and affordable rent and intermediate rent or sale.
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None required.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None required.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~

SA Objective	Commentary	Option 1: 60/40 split for social and affordable rent and intermediate rent or sale.	Option 2: 70/30 split for social and affordable rent and intermediate rent or sale	Option 3: 80/20 split for social and affordable rent and intermediate rent or sale.
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>The provision of housing will help support economic growth across the Borough. All options would make a contribution to this objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	~	~	~

SA Objective	Commentary	Option 1: 60/40 split for social and affordable rent and intermediate rent or sale.	Option 2: 70/30 split for social and affordable rent and intermediate rent or sale	Option 3: 80/20 split for social and affordable rent and intermediate rent or sale.
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None required.</p>	~	~	~
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None required.</p>	~	~	~

SA Objective	Commentary	Option 1: 60/40 split for social and affordable rent and intermediate rent or sale.	Option 2: 70/30 split for social and affordable rent and intermediate rent or sale	Option 3: 80/20 split for social and affordable rent and intermediate rent or sale.
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified.</p> <p><b>Assumptions</b>            It is assumed that in directing housing to accessible locations and high density areas, Policy H1 has taken account of potential air quality effects in these locations/areas.</p> <p><b>Uncertainties</b>            None required.</p>	~	~	~
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified.</p> <p><b>Assumptions</b>            It is assumed that in directing housing to accessible locations and high density areas, Policy H1 has taken account of any known flood risks in these locations/areas.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~

SA Objective	Commentary	Option 1: 60/40 split for social and affordable rent and intermediate rent or sale.	Option 2: 70/30 split for social and affordable rent and intermediate rent or sale	Option 3: 80/20 split for social and affordable rent and intermediate rent or sale.
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>All options would make a significant contribution to the achievement of this objective. Option 3 would make a significant contribution but would not include the intermediate sector (although this is a small part of overall need).</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++/?
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>The provision of appropriately sized affordable housing will contribute to this objective. Option 3 would make a significant contribution but given the level of need identified in the SHMA an uncertainty has been indicated to reflect the fact that it would not reflect local needs.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++/?
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>The options would result in the provision of affordable housing. Option 3 would make a significant contribution but given the level of need identified in the SHMA an uncertainty has been indicated to reflect the fact that it would not reflect local needs.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++/?

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None required.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None required.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~
7. Employment: Reduce worklessness and increase employment opportunities for all residents	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>The provision of housing will help support economic growth across the Borough. All options would make a contribution to this objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	~	~	~

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None required.</p>	~	~	~
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified.</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None identified.</p>	~	~	~
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b>            Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b>            None identified</p> <p><b>Assumptions</b>            None identified.</p> <p><b>Uncertainties</b>            None required.</p>	~	~	~

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> It is assumed that in directing housing to accessible locations and high density areas, Policy H1 has taken account of potential air quality effects in these locations/areas.</p> <p><b>Uncertainties</b> None required.</p>	~	~	~
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> It is assumed that in directing housing to accessible locations and high density areas, Policy H1 has taken account of any known flood risks in these locations/areas.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~

SA Objective	Commentary	Apply national standard	Encourage 2.5m (London Plan)	Require Local Standard of 2.5m
1. Equality: Reduce poverty and social exclusion and promote31quality for all communities.	<p><b>Likely Significant Effects</b></p> <p>The provision of good quality housing will work towards the achievement of this objective. Given the predominance of flatted development in the Borough the pursuit of objective 1 could result in a negative effect, it would also not be in compliance with London Plan Policy 3.5. The London Plan seeks to secure a minimum ceiling height of 2.5m for at least 75% of the gross internal area, so the outcome of Option 2 is positive but uncertain.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	-	++/?	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~

SA Objective	Commentary	Apply national standard	Encourage 2.5m (London Plan)	Require Local Standard of 2.5m
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>Given the predominance of flatted development in the Borough the pursuit of objective 1 could result in a negative effect, it would also not be in compliance with London Plan Policy 3.5. The London Plan seeks to secure a minimum ceiling height of 2.5m for at least 75% of the gross internal area, so the outcome of Option 2 is positive but uncertain.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	-	++/?	++
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>Given the predominance of flatted development in the Borough the pursuit of objective 1 could result in a negative effect, it would also not be in compliance with London Plan Policy 3.5. The London Plan seeks to secure a minimum ceiling height of 2.5m for at least 75% of the gross internal area, so the outcome of Option 2 is positive but uncertain.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>The Council will continue to pursue a tenure split of 70% Social / Affordable Rent and 30% Intermediate housing, increase affordable housing provision the Government's emerging policy in relation to Starter Homes and how it will impact on this split creates uncertainties..</p>	-	++/?	++

<b>SA Objective</b>	<b>Commentary</b>	Apply national standard	Encourage 2.5m (London Plan)	Require Local Standard of 2.5m
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~

<b>SA Objective</b>	<b>Commentary</b>	Apply national standard	Encourage 2.5m (London Plan)	Require Local Standard of 2.5m
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	~	~	~

SA Objective	Commentary	Apply national standard	Encourage 2.5m (London Plan)	Require Local Standard of 2.5m
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	~	~	~
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>Ceiling heights can contribute towards cooling so a negative effect is identified in relation to Option 1, a positive but uncertain effect for option 2 and a positive effect for option 3.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	-	+/?	+
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	~	~	~

SA Objective	Commentary	Apply national standard	Encourage 2.5m (London Plan)	Require Local Standard of 2.5m
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	~	~	~
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>It is assumed that in directing housing to accessible locations and high density areas, Policy H1 has taken account of any known flood risks in these locations/areas.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b></p> <p>There is no specific relationship between the options and this SA objective, performance is considered to be neutral against this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~

SA Objective	Commentary	Options	
		Option 1: Retain existing prohibition of housing in POLs	Option 2: Allow housing in POLs
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Option 1 is compliant with the Central Activities Zone (CAZ) Supplementary Planning Document (SPD) which states that residential use is not appropriate within the 'commercial cores.' This includes the Preferred Office Locations (POLs).</p> <p>It is assumed for the purpose of this SA that Option 2 would involve the loss of office space without it being replaced, this would be contrary to London Plan Policy 4.3 but it has been assessed on a precautionary basis.</p> <p>Both options could make a contribution to this objective in different ways, Option 1 could help ensure access to employment by ensuring that there is no net loss in office floorspace. Option 2 might result in the delivery of other uses, including affordable housing but at the expense of employment.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	+/?
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>POLs contribute to a mix of uses in localities and therefore contribute to this objective. Option 2 could also contribute but the outcome is uncertain because it would depend on the uses provided and the scale of any net loss in office space.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+/?

SA Objective	Commentary	Options	
		Option 1: Retain existing prohibition of housing in POLs	Option 2: Allow housing in POLs
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b> There is no clear direct relationship between the policies and this objective. However, indirectly, the economy and jobs policies will help to reduce unemployment and improve living conditions through raising wealth levels. This will have positive health impacts given the important association between employment, income and health. Sustainable economic growth will help to have positive health impacts upon all sections of the community. Option 2 could also contribute but the outcome is uncertain because it would depend on the uses provided and the scale of any net loss in office space.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+/?
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b> Both options could potentially contribute to this objective through mixed use development but it would depend on the mix of uses provided at any given location.</p> <p><b>Mitigation</b> None identified</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> Uncertain if residential development would be compatible with Local Industrial Locations..</p>	+/?	+/?
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b> Safeguarding POLs could contribute to this objective as they provide the basis for planning future infrastructure. The outcomes associated with Option 2 are less certain.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	+/?

SA Objective	Commentary	Options	
		Option 1: Retain existing prohibition of housing in POLs	Option 2: Allow housing in POLs
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>Increasing employment site provision, and by extension opportunities for employers to locate in the borough could increase the opportunities for Apprenticeships and on-the-job training (during both construction and operational phases), and so indirectly may make a contribution towards the achievement of this objective. The contribution of Option 2 is less certain.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+/?
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>Ensuring no net loss of floorspace could contribute to this objective. The outcome associated with Option 2 is less certain.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	+/?
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>Ensuring no net loss of floorspace and that the POLs retain their function could contribute to this objective. The outcome associated with Option 2 is less certain.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	+/?

SA Objective	Commentary	Options	
		Option 1: Retain existing prohibition of housing in POLs	Option 2: Allow housing in POLs
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b> Ensuring no net loss of floorspace and that the POLs retain their function could contribute to this objective. The outcome associated with Option 2 is less certain.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+/?
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b> There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b> There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~

SA Objective	Commentary	Options	
		Option 1: Retain existing prohibition of housing in POLs	Option 2: Allow housing in POLs
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>Option 1 seeks to ensure no net reduction in office floorspace, which would support sustainable modal shifts, contribute to climate change mitigation and therefore make a positive contribution to this SA objective. Outcomes in relation to Option 2 are uncertain and would depend on the resultant mix of development.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+/?
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>Option 1 seeks to ensure no net reduction in office floorspace, which would support sustainable modal shifts, contribute to a reduction in resource use and therefore make a positive contribution to this SA objective. Outcomes in relation to Option 2 are uncertain and would depend on the resultant mix of development.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+/?

SA Objective	Commentary	Options	
		Option 1: Retain existing prohibition of housing in POLs	Option 2: Allow housing in POLs
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective. Some designated areas are within flood risk zones 2 and 3 but employment is an appropriate use within such areas and development will involve the intensification and re-use of existing areas, on balance no significant effect is anticipated. Proposals under Option 2 would need to be compliant with other policies controlling uses within flood risk areas.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	0	0/?
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Maintain marketing for 12 month period	Option 2 extend marketing period to 24 months
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain land in employment use and hence provision of employment opportunities locally could contribute to this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain land in employment use and hence provision of employment opportunities locally could contribute to this objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+

SA Objective	Commentary	Option 1: Maintain marketing for 12 month period	Option 2 extend marketing period to 24 months
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>There is no clear direct relationship between the policies and this objective. However, indirectly, the retention of land in employment use could help to reduce unemployment and improve living conditions through raising wealth levels. This will have positive health impacts given the important association between employment, income and health. Sustainable economic growth will help to have positive health impacts upon all sections of the community.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>No relationship identified between the options and this objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Maintain marketing for 12 month period	Option 2 extend marketing period to 24 months
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b></p> <p>Retaining land in employment use could contribute to this objective depending on the sites location.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain land in employment use, and by extension opportunities for employers to locate in the borough could increase the opportunities for Apprenticeships and on-the-job training (during both construction and operational phases), and so indirectly may make a contribution towards the achievement of this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None required.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+

SA Objective	Commentary	Option 1: Maintain marketing for 12 month period	Option 2 extend marketing period to 24 months
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain land in employment use, and by extension opportunities for employers to locate in the borough could increase the opportunities for Apprenticeships and on-the-job training (during both construction and operational phases), and so indirectly may make a contribution towards the achievement of this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain land in employment use could contribute towards this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++

SA Objective	Commentary	Option 1: Maintain marketing for 12 month period	Option 2 extend marketing period to 24 months
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>Sites in employment use within or on the edge of town centres could contribute to this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>Depending on the location of a vacant site/building it is possible that it could detract from the setting of a heritage or could even be of value itself. Requiring evidence of marketing for two years might lead to a building or land deteriorating.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Maintain marketing for 12 month period	Option 2 extend marketing period to 24 months
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>These options could help retain employment uses within highly accessible designated areas, which would support sustainable modal shifts, contribute to climate change mitigation and therefore make a positive contribution to this SA objective but it will depend on the location of the site.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+/?	+/?

SA Objective	Commentary	Option 1: Maintain marketing for 12 month period	Option 2 extend marketing period to 24 months
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>These options could help retain employment uses within highly accessible designated areas, which would support sustainable modal shifts, contribute to a reduction in resource use associated with travel and therefore make a positive contribution to this SA objective but it will depend on the location of the site.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+/?	+/?

SA Objective	Commentary	Option 1: Maintain marketing for 12 month period	Option 2 extend marketing period to 24 months
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b></p> <p>Some buildings / land will be within flood risk zones 2 and 3 but employment is an appropriate use within such areas and development will involve the intensification and re-use of existing areas, on balance no significant effect is anticipated.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	0	0
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain land in employment use could contribute to this objective, e.g. by removing the need for greenfield development elsewhere however the requirement for sites to be marketed for 24 months could delay a site coming forward for development for an alternative beneficial use. However the Employment Land Review indicates that a period of 24 months is justifiable so these different considerations need to be balanced accordingly.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+

## SA of Options for Town Centre Designations

SA Objective	Commentary	Option 1: Maintain existing town centre designations	Option 2: Identify additional town centres and re-designation of existing centres.
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Both options will contribute to this objective by ensuring access to town centre related activities. Option 2 takes account of population growth and lower tier plans, e.g. the South Quay masterplan seeks to create a high street environment along Marsh Wall. A new civic hub at Whitechapel is also anticipated. Option 2 also identifies Neighbourhood Parades as a layer in the town centre hierarchy. Simply maintaining existing centres may not keep pace with anticipated growth and would not reflect the aspirations set out above so the outcome is assessed as positive but uncertain.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+/?	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>None of these policies directly contribute to this SA objective. However, overall the policies aim to ensure that the Borough's town centres are vibrant places at the heart of their communities that the borough's retail and leisure facilities meet the needs of local people and are resilient to future changes. In doing so the policies seek to ensure suitable uses and infrastructure provision in Town Centres and to protect general amenity, resulting in a minor positive effects on this SA objective. There is some uncertainty with option 1 because it may not adequately meet future needs.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+/?	+
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>The Options are primarily concerned with the retail function of town centres.</p> <p>Performance against this objective is considered to be neutral.</p>	~	~

SA Objective	Commentary	Option 1: Maintain existing town centre designations	Option 2: Identify additional town centres and re-designation of existing centres.
	<p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>		
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b> Supporting a network of town centres would indirectly contribute to this objective. There is some uncertainty with option 1 because it may not adequately meet future needs.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+/?	+
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b> Establishing and maintaining a network of centres would link new high footfall development with sustainable transport provision and therefore support sustainable modal shift, resulting in a direct positive effect on this SA objective. There is some uncertainty with option 1 because it may not adequately meet future needs.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+/?	+

SA Objective	Commentary	Option 1: Maintain existing town centre designations	Option 2: Identify additional town centres and re-designation of existing centres.
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>The Options are primarily concerned with the retail function of town centres. Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>The options would contribute to this objective by safeguarding existing and supporting new retail related employment in highly accessible locations. There is some uncertainty with option 1 because it may not adequately meet future needs.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+/?	+
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>The options would contribute to this objective by safeguarding existing and supporting new retail related employment in highly accessible locations. There is some uncertainty with option 1 because it may not adequately meet future needs.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+/?	+

SA Objective	Commentary	Option 1: Maintain existing town centre designations	Option 2: Identify additional town centres and re-designation of existing centres.
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>The options would contribute to this objective by safeguarding existing and supporting new retail related employment in highly accessible locations. There is some uncertainty with option 1 because it may not adequately meet future needs.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+/?	++
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>As drafted there is no clear relationship between these options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Maintain existing town centre designations	Option 2: Identify additional town centres and re-designation of existing centres.
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>These options would concentrate retail and other main town centre uses within highly accessible Town Centres and across the town centre hierarchy. Locating high footfall developments in accessible locations would support sustainable modal shifts, contribute to climate change mitigation and therefore make a positive contribution to this SA objective. However, except in relation to accessibility and transport these options would not contribute to climate change mitigation and adaption. There are uncertainties around Option 1 as it might lead to more travel if some centres become over-used.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+/?	+
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>These options do not directly contribute to this SA objective. However, both seek to concentrate retail and other main town centre uses within highly accessible Town Centres and across the town centre hierarchy, which could indirectly safeguard air quality by maximising public transport commuting rather than increased car travel. As such these policies are predicted to have an indirect minor positive effect on this SA objective. There are uncertainties around Option 1 as it might lead to more travel and associated use of resources if some centres become over-used.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p>	+/?	+

SA Objective	Commentary	Option 1: Maintain existing town centre designations	Option 2: Identify additional town centres and re-designation of existing centres.
	<p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: 70/30 split for retail and non-retail units in primary and secondary frontages	Option 2: 60/40 split for retail and non-retail units in primary and secondary frontages	Option 3: No minimum within secondary frontages
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Options 1 and 2 would contribute to this objective by ensuring access to retail facilities and equally restricting the presence of hot food takeaways, betting shops and payday loan shops. Option 3 would have no minimum for A1 units on secondary frontages and could enable the presence of such uses.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	-/?
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>None of the options directly contribute to this SA objective. Options 1 and 2 would help ensure that town centres contribute to liveability by ensuring an appropriate mix of retail units in town centres. The outcome of Option 3 is more uncertain.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	-
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>Options 1 and 2 could help ensure access to healthy foods, concerns around fast food outlets might be greater in relation to option 3.</p> <p><b>Mitigation</b></p> <p>None required.</p>	+	+	-

SA Objective	Commentary	Option 1: 70/30 split for retail and non-retail units in primary and secondary frontages	Option 2: 60/40 split for retail and non-retail units in primary and secondary frontages	Option 3: No minimum within secondary frontages
	<p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>			
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b> Supporting retail provision in town centres would indirectly contribute to this objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+	-/?
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b> The Options are primarily concerned with the retail function of town centres. Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+	+/?
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b> The Options are primarily concerned with the retail function of town centres. Performance against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None required.</p>	~	~	

SA Objective	Commentary	Option 1: 70/30 split for retail and non-retail units in primary and secondary frontages	Option 2: 60/40 split for retail and non-retail units in primary and secondary frontages	Option 3: No minimum within secondary frontages
	<p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>			
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b><u>Likely Significant Effects</u></b> The options would contribute to this objective by safeguarding existing and supporting new retail related employment in highly accessible locations. The nature of employment provided under Option 3 is uncertain.</p> <p><b><u>Mitigation</u></b> None required.</p> <p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>	+	+	+/?
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b><u>Likely Significant Effects</u></b> The options would contribute to this objective by safeguarding existing and supporting new retail related employment in highly accessible locations. The nature of employment provided under Option 3 is uncertain.</p> <p><b><u>Mitigation</u></b> None required.</p> <p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>	+	+	+/?

SA Objective	Commentary	Option 1: 70/30 split for retail and non-retail units in primary and secondary frontages	Option 2: 60/40 split for retail and non-retail units in primary and secondary frontages	Option 3: No minimum within secondary frontages
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>The options would contribute to this objective by safeguarding existing and supporting new retail related employment in highly accessible locations. Option 1 may inhibit town centres to adapt to changing circumstances, Option 2 provides potential for more flexibility. Option 3 also provides flexibility but the outcomes are uncertain in relation to secondary frontages.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++/?	++	+/?
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p>	~	~	~

SA Objective	Commentary	Option 1: 70/30 split for retail and non-retail units in primary and secondary frontages	Option 2: 60/40 split for retail and non-retail units in primary and secondary frontages	Option 3: No minimum within secondary frontages
	<p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>			
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b><u>Likely Significant Effects</u></b></p> <p>These options would concentrate retail uses within highly accessible Town Centres. Locating high footfall developments in accessible locations would support sustainable modal shifts, contribute to climate change mitigation and therefore make a positive contribution to this SA objective. However, except in relation to accessibility and transport these options would not contribute to climate change mitigation and adaption. There are uncertainties around Option 3 and the range of uses that would be attracted to secondary frontages.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	+	+	+/?
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~
14. Natural Resources: Ensure sustainable use and protection of natural resources, including	<p><b><u>Likely Significant Effects</u></b></p> <p>These options do not directly contribute to this SA objective. However, both seek to concentrate retail uses within highly accessible Town Centres, which could indirectly safeguard air quality by maximising public transport commuting rather than increased car travel. As such these policies</p>	+	+	+/?

SA Objective	Commentary	Option 1: 70/30 split for retail and non-retail units in primary and secondary frontages	Option 2: 60/40 split for retail and non-retail units in primary and secondary frontages	Option 3: No minimum within secondary frontages
water, land and air, and reduce waste	<p>are predicted to have an indirect minor positive effect on this SA objective. There are uncertainties around Option 3 and the range of uses it might attract.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>			
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b> There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~

SA Objective	Commentary	Option 1: Maintain 12 month period	Option 2: Extend period to 18 or 24 months
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b>  Both options would contribute to this objective by seeking to retain A1 uses within town centres.</p> <p><b>Mitigation</b>  None required.</p> <p><b>Assumptions</b>  None identified.</p> <p><b>Uncertainties</b>  None identified.</p>	++	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b>  Both options seek to retain retail uses within town centres which can contribute to liveability resulting in a minor positive effects on this SA objective.</p> <p><b>Mitigation</b>  None required.</p> <p><b>Assumptions</b>  None identified.</p> <p><b>Uncertainties</b>  None identified.</p>	+	+
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b>  Both options seek to retain retail uses within town centres which can contribute to access to healthy food resulting in a minor positive effects on this SA objective.</p> <p><b>Mitigation</b>  None required.</p> <p><b>Assumptions</b>  None identified.</p> <p><b>Uncertainties</b>  None identified.</p>	+	+

SA Objective	Commentary	Option 1: Maintain 12 month period	Option 2: Extend period to 18 or 24 months
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>Supporting retail provision in town centres would indirectly contribute to this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b></p> <p>These options seek to help concentrate retail uses within highly accessible Town Centres. Locating high footfall developments in accessible locations would support sustainable modal shifts, contribute to climate change mitigation and therefore make a positive contribution to this SA objective. However, except in relation to accessibility and transport these options would not contribute to climate change mitigation and adaption.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Maintain 12 month period	Option 2: Extend period to 18 or 24 months
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain a retail use could contribute to this objective but if a property remained vacant for a prolonged period of time there could be a missed opportunity in terms of suitable alternative uses.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+/?
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>Both options seek to retain retail uses, a requirement for prolonged marketing could inhibit economic growth.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+/?
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain retail uses in town centres would contribute to this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++

SA Objective	Commentary	Option 1: Maintain 12 month period	Option 2: Extend period to 18 or 24 months
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain retail uses in highly accessible locations could contribute to this objective. However, except in relation to accessibility and transport these policies would not contribute to climate change mitigation and adaption.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+

SA Objective	Commentary	Option 1: Maintain 12 month period	Option 2: Extend period to 18 or 24 months
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>Seeking to retain retail uses in highly accessible locations could contribute to this objective. However, except in relation to accessibility and transport these policies would not contribute to climate change mitigation and adaption. .</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>It is assumed that in directing main town centre uses to designated areas, Strategic Policy TC1 has taken account of any known flood risks in these general areas.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Maintain 12 month period	Option 2: Extend period to 18 or 24 months
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~

SA Objective	Commentary	Option 1: Continue to safeguard licensed waste sites	Option 2: Safeguard Suitable Sites as evidenced in the Waste Management Evidence Base
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b> There is no clear relationship between the options and this objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None required.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b> Outcomes under this objective are uncertain for Option 1 as sites licensed historically may no longer be suitable in wider planning terms. Assessing sites based on their wider suitability could contribute towards liveability in the wider area.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+/?	+
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b> Waste licensing would include considerations around potential impacts on health so both options could contribute towards this objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None required.</p>	+	+
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b> Outcomes under this objective are uncertain for Option 1 as sites licensed historically may no longer be suitable in wider planning terms. Assessing sites based on their wider suitability could contribute towards the quality of the environment experienced by housing in the wider area and also provide an opportunity for the re-use of sites for housing to be considered.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+/?	+
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b> Outcomes under this objective are uncertain for Option 1 as sites licensed historically may no longer be suitable in wider planning terms, including access by road. Assessing sites based on their wider suitability could contribute towards the quality of the environment experienced by housing in the wider area.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+/?	+

SA Objective	Commentary	Option 1: Continue to safeguard licensed waste sites	Option 2: Safeguard Suitable Sites as evidenced in the Waste Management Evidence Base
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b> Safeguarding existing sites can help remove the need to identify new ones but Option 2 provides the opportunity to assess site suitability in wider planning terms. This could include proximity of facilities to school and impact on roads near schools.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+/?	+
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b> Safeguarding existing waste management facilities contribute to employment in the Borough in the waste management sector resulting in a minor indirect effect. Both options could contribute towards the achievement of this objective. Option 2 might provide the opportunity for sites to be re-used for alternative purposes, including employment.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b> Safeguarding existing waste management facilities contribute to employment in the Borough in the waste management sector resulting in a minor indirect effect. Both options could contribute towards the achievement of this objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b> There is no clear relationship between the options and this objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b> Safeguarding existing licensed sites could give rise to effects in relation to impacts on design/character of the wider area. Safeguarding sites on the basis of their wider suitability could contribute towards this objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+/?	+

SA Objective	Commentary	Option 1: Continue to safeguard licensed waste sites	Option 2: Safeguard Suitable Sites as evidenced in the Waste Management Evidence Base
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b> Safeguarding existing sites can help remove the need to identify new ones but Option 2 provides the opportunity to assess site suitability in wider planning terms. This could include proximity of facilities to open space and impact on roads near open spaces.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+/?	+
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b> Both options contribute to this objective by enabling a network of waste management facilities to be maintained in the Borough, potentially reducing emissions associated with the transport of waste and disposal to landfill. Option 2 potentially provides more flexibility because sites can be assessed on their suitability for a range of technologies whereas existing licensed sites will be legacy sites that may not have the same potential for a range of technologies, e.g. by reason of their size, location etc.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++/?	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b> Both options could contribute to this objective by reducing the need to transport waste, reducing pollution associated with the transport of waste by road and potential effects on biodiversity associated with that.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b> Both options contribute to this objective by enabling a network of waste management facilities to be maintained in the Borough, potentially reducing emissions associated with the transport of waste and disposal to landfill. Option 2 potentially provides more flexibility because sites can be assessed on their suitability for a range of technologies whereas existing licensed sites will be legacy sites that may not have the same potential for a range of technologies, e.g. by reason of their size, location etc..</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++/?	++

SA Objective	Commentary	Option 1: Continue to safeguard licensed waste sites	Option 2: Safeguard Suitable Sites as evidenced in the Waste Management Evidence Base
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral for both options.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> Performance against this objective is considered to be neutral for both options.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~

<b>SA Objective</b>	<b>Commentary</b>	Option 1 minimum 45% reduction on site	Option 2 35 % reduction on site
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b> Both options could result in the deployment of decentralised energy systems in residential developments, this could reduce the exposure of future residents to market prices and enable the provision of subsidised energy for vulnerable groups. Consequently this policy has the potential to indirectly reduce fuel poverty and therefore contribute to this SA objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None required.</p> <p><b>Uncertainties</b> None identified.</p>	+	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b> Both options could result in the deployment of decentralised energy systems in residential developments, this could reduce the exposure of future residents to market prices and enable the provision of subsidised energy for vulnerable groups. Consequently this policy has the potential to indirectly reduce fuel poverty and therefore contribute to this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None required.</p>	+	+
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b> Access to decentralised energy and energy efficient homes could contribute to this objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~

<b>SA Objective</b>	<b>Commentary</b>	Option 1 minimum 45% reduction on site	Option 2 35 % reduction on site
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~

SA Objective	Commentary	Option 1 minimum 45% reduction on site	Option 2 35 % reduction on site
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b> Both options contribute to this SA objective through encouraging a reduction in carbon emissions associated with residential and non-residential development.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b> Reductions in carbon emissions and other associated pollutants could contribute to this objective because some habitats are vulnerable to pollutants.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b> Reducing carbon emissions and associated pollutants could help contribute to improved air quality. Energy efficient development will help reduce consumption of natural resources.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~

<b>SA Objective</b>	<b>Commentary</b>	Option 1 minimum 45% reduction on site	Option 2 35 % reduction on site
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> No specific relationship between the options and objective identified.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>It will be important for all options to ensure that sufficient parking is provided for disabled persons.</p> <p>Providing adequate parking for bicycles will help provide transport choice.</p> <p>All options relating to car parking and cycle parking are considered to contribute towards this objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	+	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>Adequate car and cycle parking will contribute to liveability. All options are considered to contribute towards this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	+	+

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>Options relating to cycle parking could help increase cycling within the Borough, resulting in improved physical health through exercise and a direct major positive effect on this SA objective.</p> <p>Increasing car parking could impact on health, e.g. by impacting on air quality (although developments would need to demonstrate air quality neutrality) so the overall effect is uncertain.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	-/?	+	+	++	++
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>Parking provision for affordable family homes and accessible properties would contribute towards this objective and a minor positive effect is anticipated.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	+	+

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b> All options would contribute towards this objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	++	++	++	++
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b> The performance of options against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None required.</p>	~	~	~	~	~

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b> Performance of the options against this objective is considered to be neutral.</p> <p><b>Mitigation</b> None identified</p> <p><b>Assumptions</b> It is assumed through directing development to highly accessible locations the public transport network can connect local residents with local employment opportunities (i.e. that spatial mismatch does not occur or that public transport networks do not serve the local employment seeking population).</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	~
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b> Reducing congestion could contribute to this objective but the overall impact of options is uncertain.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+	+	+	+

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b> Ensuring adequate parking within town centres would contribute to this objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+	+	+	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	~

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	~
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b> Reduced parking for cars and improved parking for cycling could contribute to this objective. Option 1 might result in increased car use and associated emissions.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	-/?	+	+	+	+

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	~
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b> Reduced parking for cars and improved parking for cycling could contribute to this objective. Option 1 might result in more car use and an impact on air quality, although development would need to demonstrate that it was air quality neutral.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified. None identified.</p> <p><b>Uncertainties</b> None identified.</p>	-/?	+	+	+	+

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	~
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	~





## Appendix L Policies



SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Spatial Policy S.SG1 contributes to this objective by directing development to the Opportunity Areas identified in the Local Plan and other accessible locations.</p> <p>Whilst Spatial Policy S.SG2 sets out measures to share the benefits of growth including the creation of mixed and balanced communities, tenure blind development and accessible community facilities and services. Therefore the policy would have a minor positive effect on this SA objective.</p> <p>Policy D.SG3 contributes towards this objective by requiring HIA for proposals including A5 uses and betting shops.</p> <p>There is no clear relationship between policy D.SG4 and this SA objective.</p> <p>Developer contributions through Section 106 Agreements and the Community infrastructure Levy could contribute to this objective through the provision of community facilities, health facilities, affordable housing and employment and training facilities. Policy D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	~	+	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>Policy S.SG1 includes the need for development to contribute to infrastructure that would contribute to this objective.</p> <p>Policy S.SG2 sets out requirements for infrastructure provision and high quality and inclusive design, which would directly contribute to this SA objective by ensuring appropriate infrastructure is provided alongside</p>	+	++	+	++	+	++

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	<p>development proposals and by promoting high quality public realm. A significant positive effect is identified.</p> <p>Policy D.SG3 will contribute to liveable neighbourhoods by considering the location of a range of facilities and the suitability of their location from a public health perspective, a minor positive effect is identified.</p> <p>Policy D.SG4 requires specified development proposals to consider and reduce any cumulative amenity impacts arising during their construction phase. This would directly contribute to this SA objective through ensuring adequate mitigation of construction related noise, vibration and pollution impacts. A significant positive effect is identified.</p> <p>Developer contributions through Section 106 Agreements and the Community Infrastructure Levy could contribute to this objective through the provision of community facilities, strategic public art, health facilities, affordable housing and open space. Policy D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p> <p>The 2016 IIA Report suggested that, in order to enhance the contribution of (what is now) Policy S.SG1 to this SA objective, consideration should be given to including criteria regarding the prevention of anti-social behaviour, reducing fears of crime and improving public safety through design. These considerations were incorporated in Policy D.DH2.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>						
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>Spatial Policy S.SG1 identifies the need for development to deliver a range go facilities that will contribute to this objective, including parks, health and leisure facilities.</p> <p>Spatial Policy S.SG2 sets out criteria to minimise pollution and ensure that development proposals contribute to healthy environments, a minor positive effect is identified.</p>	+	+	++	++	+	+

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	<p>Policy D.SG3 requires specified proposals to complete a Health Impact Assessment (HIA) and references the HUDU healthy urban planning checklist, a significant positive effect is identified.</p> <p>Policy D.SG4 requires development proposals to consider and reduce any cumulative amenity impacts arising during their construction phase. This would directly contribute to this SA objective through ensuring adequate mitigation of amenity impacts that could otherwise generate negative human health risks, a significant positive effect is identified.</p> <p>Developer contributions through Section 106 Agreements and the Community Infrastructure Levy could contribute to this objective through the provision of community facilities, health facilities, affordable housing, training and employment provision and open space. Policy D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p> <p>The requirement for HIA was previously included in S.SG1 and the November 2016 IIA recommended that the supporting text could reference the Healthy Urban Development Unit's' (HUDU) Healthy Urban Planning Checklist'. The supporting text to the new policy (D.SG3) references the HUDU checklist.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>						
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>Spatial Policy S.SG1 sets out the spatial strategy for development in the Borough, including the provision of housing. A minor positive effect is identified on this basis.</p> <p>Spatial Policy S.SG2 requires development proposals to be of a high quality design and also seeks incorporate inclusive design principles. This would directly contribute to this SA objective through firstly supporting increased housing provision in accessible locations and secondly ensuring that residential development proposals meet good design standards.</p>	+	++	+	~	+	0

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	<p>Policy D.SG3 will make a minor positive contribution to this objective by ensuring that a HIA is undertaken if housing is proposed within an area of sub-standard air quality.</p> <p>There is no clear relationship between Policy D.SG4 and this SA objective.</p> <p>The provision of affordable housing through S.106 contributions will contribute to this objective. Policy D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>Whilst there is no relationship regarding overall housing supply, mix, size or tenure it is assumed that these matters will be addressed through the housing policies of the Local Plan.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>						
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b></p> <p>Policy S.SG1 directs development to the Opportunity Areas and highly accessible locations along transport corridors. The policy also identifies the need for development to contribute towards the provision of new infrastructure. A minor positive effect is identified.</p> <p>Policy S.SG2 requires development proposals to include relevant infrastructure provision and to be sited in accessible locations, however less attention is given in the policy to requiring development proposals to contribute to sustainable modal shifts. As such the policy would have a minor positive effect on this SA objective.</p> <p>The requirement for HIA under D.SG3 could help ensure that safe connections are provided to new and existing facilities, including open spaces and a minor positive effect is identified.</p> <p>D.SG4 seeks to minimise construction disruption on road network through routing, scheduling and frequency of HGVs etc, and so could be considered to make a minor positive contribution to this objective.</p>	+	+	+	+	+	+

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	<p>Using CIL contributions to secure roads and other transport facilities will contribute to the achievement of this objective. Section 106 contributions may also be sought on specific projects contributions towards transport and highways improvements that cannot be secured through other arrangements. Policy D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>						
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>Policy S.SG1 includes the need for development to contribute towards new social infrastructure, including schools.</p> <p>Policy S.SG2 requires development proposals to maximise the accessibility of community facilities and services, which would include education infrastructure and learning facilities. This would enable the Council to continue discharging their statutory education duties, and could also provide other facilities to enhance opportunities for learning. The policy also requires development to provide local training and employment opportunities during construction and end use or both. A significant positive effect is identified.</p> <p>The requirement for HIA under D.SG3 could help ensure that new schools are provided in appropriate locations, a minor positive effect is identified.</p> <p>There is no clear relationship between Policy D.SG4 and this SA objective.</p> <p>The use of CIL to contribute to public education facilities and employment and training facilities will contribute to this objective. Policy D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p>	+	++	+	~	+	+

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	<p>None required.</p> <p><b>Assumptions</b></p> <p>It is assumed that the infrastructure identified in the Infrastructure Delivery Framework and required through the Planning Obligations SPG (2016) will allow the Council to discharge their statutory education duties, provide opportunities for lifelong learning and contribute to upskilling.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>						
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>Policy S.SG1 identifies key employment areas, including Canary Wharf, City Fringe, a minor positive effect is identified.</p> <p>Policy S.SG2 seeks to provide local training or employment opportunities. This would increase access to employment opportunities and could help to reduce worklessness by seeking to secure local training and employment during both the construction and operational phase, a minor positive effect is identified.</p> <p>There is no clear relationship between Policy D.SG3 and 4 and this SA objective.</p> <p>The use of CIL to secure employment and training facilities will support this objective as will contributions towards training through S.106 Agreements. D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	~	~	+	+
8. Economic Growth: Create and sustain local	<b>Likely Significant Effects</b>		+	~	~	+	0

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
economic growth across a range of sectors and business sizes.	<p>Policy S.SG1 identifies key employment areas, including Canary Wharf, City Fringe, a minor positive effect is identified.</p> <p>Policy S.SG2 sets out criteria to ensure that economic growth can be managed sustainably, ensure access to employment opportunities and maximise opportunities through development proposals to reduce deprivation. However there is only a weak indirect positive relationship as Policy S.SG2 does not seek to influence or direct economic growth to stimulate regeneration, improve resilience or provide specific types of employment uses. A minor positive effect is identified on this basis.</p> <p>There is no clear relationship between Policies D.SG3 and 4 and this SA objective.</p> <p>The use of CIL to secure employment and training facilities will support this objective as will contributions towards training through S.106 Agreements. D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>						
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>Policy S.SG1 identifies the town centres of the borough as the focus of shopping, leisure, cultural and community activities and also promotes the continued growth of Canary Wharf as a metropolitan centre. A minor positive effect is identified.</p> <p>As drafted there is no clear relationship between Policies S.SG2, 3 and 4 and this SA objective.</p> <p>The use of CIL to secure strategic public art, community and leisure facilities, health facilities and infrastructure related to public safety could contribute to this objective if such facilities are provided in town centres.</p>	+	~	~	~	+	0

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	<p>D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>						
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>Policy S.SG1 requires development outside of the Opportunity Areas to respect the character of the streetscape. A minor positive effect is identified.</p> <p>Criterion 1 within Policy S.SG2 requires development proposals to take account of setting, heritage and quality of design, which would directly contribute to this SA objective through ensuring consideration of relevant placemaking issues.</p> <p>There is no relationship between D.SG3 and 5 and this SA objective.</p> <p>Use of the considerate constructors programme, or similar, as required under D.SG4 would require developers, amongst other things, to consider 'the cumulative impact of development occurring in the vicinity on levels of noise, vibration, artificial light, odour, fumes or dust pollution, and plan timings of works' which will limit the adverse effects on the setting and character of important existing built heritage assets during the construction phase, a minor positive effect is therefore anticipated.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b></p>	+	++	~	+	~	0

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	None identified.						
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>Policy S.SG1 requires new development to support the delivery of new infrastructure, including green grid projects and parks. A minor positive effect is identified.</p> <p>Criterion 1 within Policy S.SG2 requires development proposals to take account of setting, heritage and quality of design, which would directly contribute to this SA objective through ensuring consideration of relevant placemaking issues in relation to existing open spaces. The policy also requires infrastructure and public realm improvements which are accessible to all.</p> <p>The requirement for HIA under D.SG3 could help ensure that open spaces are appropriately located.</p> <p>There is no clear relationship between Policy D.SG4 and this SA objective.</p> <p>Using CIL to secure public open space will contribute to this objective, as will the provision of children's play space through S.106 contributions. D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	~	+	+
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>There is no relationship between Policies S.SG1, S.SG2 and D.SG3 and this SA objective.</p> <p>Policy D.SG4 includes measures that will contribute towards climate change mitigation, including the use of sustainable construction methods and use of demolished material from the site and measures to reduce</p>	~	~	~	+	+	0

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	<p>the movement of goods by road. A minor positive contribution to this objective is identified.</p> <p>The use of CIL to secure strategic energy and sustainability infrastructure will contribute towards this objective. S.106 contributions relating to carbon off-setting will also contribute to this objective. D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>						
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>Policy S.SG1 identifies the need for development to contribute to green grid projects that could help meet this objective and a minor positive effect is identified.</p> <p>Both policies S.SG2 and D.SG4 require consideration of amenity and environmental/pollution impacts, which could help to conserve and enhance habitats and biodiversity. However, there is only a weak relationship with this SA objective as the policies do not set out any criteria specifically regarding biodiversity or avoiding significant adverse environmental effects, these factors are addressed in other policies, e.g. Policy ES4 'Urban Greening and Biodiversity'.</p> <p>There is no relationship between D.SG3 and this SA objective.</p> <p>The Council's Regulation 123 List includes a range of strategic infrastructure types, such as open space, sustainability infrastructure and community facilities. Where strategic infrastructure projects fall under the infrastructure types in the Regulation 123 List, financial planning obligations will not be sought for the same project. Biodiversity measures that are not covered by the Councils Regulation 123 List and are deemed necessary to the particular development to mitigate specific impacts of that development will be dealt with by planning condition or if this is not possible, by financial and/or non-financial planning obligation.</p>	+	+	~	+	+	+

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	<p>These measures will contribute towards this objective. D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>						
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>There is no relationship between S.SG1 and this policy.</p> <p>Both policies S.SG2 and D.SG3 support this SA objective through seeking to protect the environment and resources, which could avoid pollution discharges, safeguard soil quality, protect against poor air quality, and promote the re-use of demolished material. . Policy S.SG1 will help ensure that sustainable design standards are incorporated in development, contributing to this objective throughout the life of a project.</p> <p>Policy D.SG4 will contribute to a reduction in resource uses and a reduction in impacts on resources during the construction phase. Development enabled by the plan will give rise to greater resource use so on balance a minor positive effect is anticipated in relation to this objective.</p> <p>There is no relationship between D.SG3 and D.SG5 this SA objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	+	~	+	~	+

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b></p> <p>There is no relationship between Policies S.SG1 and S.SG2 and this objective.</p> <p>Policy D.SG3 could make a minor significant contribution to this objective if HIAs consider flood risk as an issue.</p> <p>Policy D.SG4 requires consideration of the potential for effects on flood risk and drainage during the construction phase and for mitigation measures to be introduced. The policy is assessed as making a minor positive contribution to this objective.</p> <p>CIL contributions will be used for strategic flood defences and therefore contribute to this objective. D.SG5 sets the policy context for this and a minor positive effect is identified.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	+	+	+	+
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b></p> <p>There is no relationship between Policies S.SG1 and S.SG2, D.SG5 and this objective.</p> <p>Policy D.SG3 support this SA objective requiring certain development proposals to be supported by an HIA and through seeking to protect amenity and the environment during construction processes</p> <p>Policy D.SG4 encourages sustainable design and construction methods, which could include those relating to the remediation of contaminated land.</p> <p><b>Mitigation</b></p> <p>None identified.</p>	~	~	+	+	~	+

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		S.SG1 Areas of growth and opportunity within Tower Hamlets	S.SG2: Delivering sustainable growth in Tower Hamlets	D.SG3: Health Impact Assessments	D.SG4: Construction of new development	D.SG5 Developer contributions	
	<p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>						

SA Objective	Commentary	Draft Policies											Cumulative Effect of the Draft Policies
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage	D.DH11: Telecommunications	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Policy S.DH1 requires development proposals to demonstrate good design principles, partly to protect and enhance amenity – promoting mental and physical well-being of occupants/users of the site and neighbouring properties. S.DH1 also includes criteria to ensure that development proposals are adaptable to the changing needs of users and that open spaces are publicly accessible. These factors indirectly contribute to this SA objective through ensuring access to high quality places for a range of demographic groups, which could promote social cohesion and integration and reduce social exclusion.</p> <p>Policy D.DH2 requires development proposals to provide a range of public spaces that can function as places for social gatherings and also resists the creation of gated communities, a principle that is relevant to this objective. This could enhance social interactions within neighbourhoods, resulting in an indirect positive effect on this SA objective through improved social cohesion and integration.</p> <p>Policies D.DH6, D.DH7 and D.DH8 make a minor positive contribution and seek to ensure that all communities enjoy a comfortable living environment.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	~	~	~	+	+	+	~	~	~	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>Policy S.DH1 and Policy D.DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design. This would ensure that developments provide permeable, multi-functional and connecting street infrastructure and high quality public realm provision, such that these policies directly contribute to this SA objective.</p> <p>Policy S.DH1 also sets out criteria to ensure that development creates well connected and integrated places and that over - development of sites is avoided.</p>	++	++	~	~	~	+	++	++	++	++	++	++



SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage	
	<p>It was previously suggested that Strategic policy S.DH1 could highlight the need for all development to incorporate designing out crime principles. Policy D.DH2 references Secured by Design.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+				+	+	++			++
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>Policy S.DH1 requires development proposals to demonstrate good placemaking principles, seeking to ensure that developments are supported by publicly accessible open spaces that promote health and well-being. This would provide opportunities to participate in recreational activities, encourage active travel and increase social interactions, all of which would increase health and wellbeing and directly contribute to this SA objective. As such the policy would have a significant positive effect on this SA objective.</p> <p>Policy S.DH1 also sets out criteria to ensure that proposed developments are designed to be adaptable to the changing needs of users and that the effects on microclimate are taken into account. The policy also seeks to ensure that development mitigates the impacts of noise, overheating and air pollution. Consequently the policy would have a significant positive effect on this SA objective.</p> <p>Policy D.DH2 requires development proposals promote a well-connected, joined up and easily accessible street network and wider network of public spaces by taking steps to improve and enhance connectivity, permeability and legibility. This would encourage development proposals to embed active travel infrastructure within street networks, which could increase participation in, and the safety of, active travel, resulting in indirect positive physical health outcomes and therefore indirectly contributing to this SA objective.</p> <p>Policy D.DH6 makes a minor positive contribution by requiring developments with tall buildings, which include residential use, to provide high quality private and communal open space and play areas for local residents. Development outside of Tall Building Zones must also meet three criteria, which include demonstrating that it can deliver significant publicly accessible open space.</p> <p>Policy D.DH7 in relation to densities will contribute to this objective by ensuring that developments exceeding the appropriate density range in the London Plan should</p>	++	+	~	~	~	+	+	++	~	~	~





SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage	
	<u>Uncertainties</u> None identified.											
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<u>Likely Significant Effects</u> There is no clear relationship between these policies and this SA objective. <u>Mitigation</u> None required. <u>Assumptions</u> None identified. <u>Uncertainties</u> None identified.	~	~	~	~	~	~	~	~	~	~	0
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<u>Likely Significant Effects</u> Policy S.DH1 and Policy D.DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design. These policies would improve the appearance of neighbourhoods and enhance the quality of the built environment, which would be likely to support investment by existing and new businesses, resulting in local business growth, wider economic growth and regeneration of neighbourhoods in need of socio-economic renewal. The policies would therefore have a significant positive effect on this SA objective. D.DH6 directs Tall Building proposals to designated Tall Building Zones. This could help create clusters of firms that desire such a location, it is uncertain how relevant this would be as a locational factor so a minor positive effect has been recorded. <u>Mitigation</u> None required. <u>Assumptions</u> None identified.	++	++	~	~	~	+	~	~	~	~	+



SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage	
	<p>All of the policies therefore directly contribute to this SA objective and would have a significant positive effect on it through ensuring that development proposals are appropriately sited, designed and integrated with their surroundings.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	++									
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>Policy S.DH1 requires development proposals to provide a mix and range of publicly accessible open spaces that promote biodiversity, health and well-being.</p> <p>Policy D.DH2 requires development proposals promote a well-connected, joined up and easily accessible street network and wider network of public spaces by taking steps to improve and enhance connectivity, permeability and legibility. As such the policy could help link and enhance open spaces, resulting in a significant positive effect on this SA objective.</p> <p>Policy D.DH6 makes a minor positive contribution by requiring developments with tall buildings to provide high quality private and communal open space and play areas for local residents. Development outside of Tall Building Zones must also demonstrate that it can deliver significant publicly accessible open space.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p>	++	++	~	~	~	+	~	~	~	~	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage	
	<u>Uncertainties</u> None identified.											
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<u>Likely Significant Effects</u> Policy S.DH1 requires development proposals to demonstrate good placemaking principles, including through the optimisation of energy and waste efficiency and measures to avoid overheating. As such the policy would contribute to and have a minor positive effect on this SA objective.  Policy D.DH2 requires development proposals improve connectivity to public transport hubs, town centres, open spaces and social and community facilities. This would help ensure that streets and wider transport networks function efficiently, as well as encouraging active travel modes, reduced car travel and sustainable modal shifts. A minor positive effect is identified in relation to this objective as the resulting scale and significance of any reduction in carbon emissions is unknown.  There is no clear relationship between the other Design and Historic Environment policies and this SA objective.  <u>Mitigation</u> None required.  <u>Assumptions</u> None identified.  <u>Uncertainties</u> None identified.	+	+	~	~	+	~	~	~	~	~	+
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<u>Likely Significant Effects</u> Policy S.DH1 requires development proposals to provide open spaces that promote biodiversity. As such the policy would contribute to and have a significant positive effect on this SA objective.  Policy D.DH6 sets out criteria to assess the acceptability of tall building proposals, including specifically a requirement to avoid adverse impacts on biodiversity. This would safeguard ecological interests, although taking account of the narrow scope	++	~	~	~	~	+	~	~	~	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage	
	<p>of this policy in relation to biodiversity, only a minor positive effect on this SA objective is predicted.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+					+					+
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>Policy S.DH1 requires development proposals to optimise energy and waste efficiency. Consequently the policy would support the development of the circular economy and contribute to this SA objective.</p> <p>Policy D.DH2 requires development proposals to improve connectivity to public transport hubs, town centres, open spaces and social and community facilities. Consequently the policy could indirectly help to improve local air quality and therefore contribute to this SA objective.</p> <p>Policy D.DH6 includes a requirement that tall buildings do not have an adverse impact on watercourses and water bodies and a minor positive effect is identified on this basis.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p>	++	+	~	~	~	+	~	~	~	~	~

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage	
	<p><b>Uncertainties</b> None identified.</p>	++	++				+					++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b> Policies S.DH1 and D.DH2 require development proposals to incorporate high-quality public and open spaces, which could reduce surface run-off and therefore reduce flood risks. Consequently these policies contribute to and would have a significant positive effect on this SA objective.  Policy D.DH6 requires proposals for tall buildings to demonstrate that they will not adversely impact on water courses and their hydrology, it also requires the provision of open space which could help reduce surface run-off.  There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	++	~	~	~	+	~	~	~	~	++
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> Policy D.DH8 safeguards human health by requiring development proposals to avoid unacceptable nuisances and pollution impacts. This would help to ensure that contaminated land is adequately and safely remediated, resulting in reduced adverse health risks. Consequently the policy would have a significant positive effect on this SA objective.  There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p>	~	~	~	~	~	~	~	++	~	~	0

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
	<p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage	D.DH11: Telecommunications









SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b></p> <p>Policies S.H1, D.H4, D.H5 and D.H6 direct residential developments, including for specialist housing, to areas with high accessibility and suitable infrastructure provision. This would have an indirect minor positive effect on this SA objective through improving the accessibility of the transport network, with potential secondary positive impacts in terms of sustainable modal shift, transport efficiency and providing support for investment to increase transport infrastructure capacity and connectivity. Policy D.H7 also directs HMOs to areas with high transport accessibility.</p> <p>As policies D.H2 and D.H3 do not direct housing to specific locations or specify different infrastructure requirements there is no clear relationship between the policy and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	~	~	+	+	+	+	+

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>The policies do not directly contribute to this SA objective. However:</p> <ul style="list-style-type: none"> <li>Policies S.H1 and D.H5 provides a settled base for Gypsies and Travellers (G&amp;Ts) which will enable any G&amp;T children to access education facilities.</li> <li>Policy D.H6 supports the provision of student housing close to education institutions and in highly accessible locations, which would enable the Borough to accommodate a growing student population and therefore indirectly contribute to the growth of education institutions and other learning opportunities.</li> <li>Policy D.H7 contributes to this objective by requiring houses in multiple occupation to be located in areas of high transport accessibility.</li> </ul> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	~	~	~	+	+	+	+



SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>Policy D.H6 indirectly contributes to this SA objective as it directs student accommodation to highly accessible locations, which are likely to include Town Centres, which would increase footfall and support their vitality, a minor positive effect is identified on this basis. Policy D.H4 also directs housing for older and vulnerable people to locations with local services, which could indirectly support the vitality of Town Centres and other centres by maintaining and increasing footfall within them, a minor positive effect is also identified on this basis.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~	+	~	+	~	+

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>Policy S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through promoting high quality design. The policy also requires account to be taken of the cumulative effects of development. A minor positive effect is identified on this basis.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	+	~	~	~	~	~	~	0

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>Policy S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through ensuring a placemaking approach to development, a minor positive effect is identified.</p> <p>Policy D.H3 sets minimum open space standards for residential developments and safeguards existing amenity space, therefore directly contributing to this SA objective and a significant positive effect is identified.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	+	~	++	~	~	~	~	0

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>Policy S.H1 requires all residential development proposals to be appropriate, high-quality, well-designed and sustainable, which in general terms aligns will support alignment with this SA objective (in that it will include consideration of low carbon and zero carbon design, consistent with the Mayor's Housing Supplementary Planning Guidance).</p> <p>Policy D.H4 directs Specialist housing proposals to locations with good public transport accessibility and infrastructure. Policy D.H7 directs HMOs to areas of high transport accessibility. Policy D.H6 directs proposals for student accommodation to areas of high transport accessibility. In line with this SA objective these policies would indirectly ensure access to public transport for new residents, supporting sustainable modal shifts leading to carbon emissions reduction, minor positive effects are identified.</p> <p>As drafted there is no clear relationship between the other Housing policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	~	~	+	~	+	+	+

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>None of the housing policies relate to site specific or detailed ecological matters, and in consequence there are no direct effects on this SA objective. However, Policy S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through requiring consideration of the relationship between the proposal and the surrounding environment including habitats and species. In addition policy D.H3 requires residential proposals to protect existing amenity space, which could indirectly safeguard habitats and therefore support this objective, minor positive effects are identified.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	+	~	+	~	~	~	~	+

SA Objective	Commentary	Draft Policies							Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>These policies do not directly contribute to this SA objective. However, Policies S.H1, D.H4 and D.H6 direct housing proposals to locations with good public transport accessibility and infrastructure. The proposed use of more sustainable, accessible locations which could indirectly safeguard air quality by maximising public transport commuting rather than increased car travel. As such the policies are predicted to have an indirect minor positive effect on this SA objective.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>Potential effects in relation to air quality are highlighted for consideration in other policies, e.g. Policy S.ES2.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	+	~	~	+	~	+	~	+





SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Policy S.EMP1 references the GLAs target of creating an additional 125,000 jobs in the Borough by 2031, which is based on historical trends. The Local Plan does not demonstrate how this target will be met over the plan period. The policies are however judged to make a significant positive contribution to this objective because they provide the policy context for encouraging development sites for employment to come forward, the protection of existing employment capacity and also aim to create an environment for increased investment and job creation. For example, Policy S.EMP1 includes "3a) ensuring availability of a range of workspaces and unit sizes, start-up space, co-working space and 'grow-on' space by protecting existing floorspace and encouraging the provision of new floorspace; and b) working with affordable and shared workspace providers to bring forward affordable, flexible and shared workspace."</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>There is some uncertainty as the Plan does not demonstrate if/how it can fully meet the GLAs target although the Local Plan indicates that the Council is confident that the target can be met. Part 6 of the Local Plan in relation to monitoring sets out a commitment to monitor progress and review the Local Plan if necessary.</p>	++/?	++/?	++/?	++/?	++/?

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>These policies do not directly contribute to this SA objective.</p> <p>Policy S.EMP1 could contribute to this objective by encouraging mixed use developments in the Central Activities Zone (Zone C).</p> <p>Policy D.EMP4 requires the redevelopment of designated employment areas to be appropriate to its surroundings and to ensure that non-employment uses are compatible with the site, resulting in an indirect minor positive effect on this SA objective due to amenity protection from noise, vibration and pollution.</p> <p>There is no clear relationship the other Employment policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	~	~	+	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>There is no clear direct relationship between the policies and this objective. However, indirectly, the economy and jobs policies will help to reduce unemployment and improve living conditions through raising wealth levels. This will have positive health impacts given the important association between employment, income and health. Sustainable economic growth will help to have positive health impacts upon all sections of the community.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>Policy S.EMP1 could contribute to this objective by encouraging mixed use developments in the Central Activities Zone (Zone C), which could include residential development.</p> <p>Policy D.EMP4 allows for the redevelopment of sites in Local Industrial Locations provided that the proposed use is compatible. This has been assessed on the basis that it could include residential development, as indicated in the supporting text to the policy.</p> <p>There is no clear relationship the other Employment policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified</p>	+	~	~	+	0
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b></p> <p>These policies seek to concentrate new employment and light industrial uses within highly accessible designated areas, which would support sustainable modal shifts, increase the efficiency of freight transport and directly contribute to this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>Increasing employment site provision, and by extension opportunities for employers to locate in the borough could increase the opportunities for apprenticeships and on-the-job training (during both construction and operational phases), and so indirectly may make a contribution towards the achievement of this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>It is assumed that whilst not included within these policies other Local Plan policies would adequately safeguard existing education and learning facilities from land use changes, including for employment uses.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>These policies encourage the development of employment floorspace and identify designated employment areas where specific types of employment uses should be directed to, whilst seeking to prevent the loss of employment space within designated areas and ensure that new employment developments are compatible with existing and surrounding uses. As such all of these policies support the overall delivery of new employment opportunities, Policy S.EMP1 also highlights the need to ensure that the borough's residents have access to education and skills that will enable them to benefit from local employment and enterprise opportunities.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>It is assumed that whilst not included within these policies, other Local Plan policies and other initiatives, e.g. Skillsmatch would address worklessness and barriers to employment for local people.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>These policies encourage the development of employment floorspace and identify highly accessible areas where specific types of employment and light industrial uses should be directed to, whilst seeking to prevent the loss of employment or industrial space. As such the policies directly contribute to this SA objective through safeguarding existing and supporting new employment and businesses/light industrial developments in appropriate locations.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>These policies identify accessible designated areas where specific types of employment and light industrial uses should be directed to. In some (but not all cases) these areas overlap with defined Town Centres, resulting in a minor positive effect on this SA objective through increasing Town Centre activity, footfall and vitality. Policy S.EMP1 includes policy on the scale and nature of employment development that will be appropriate in designated town centres, helping to ensure that development complements the role of the town centres.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>These policies do not address issues within this SA objective regarding density, townscape, cultural heritage or landscape matters. However, Policy S.EMP1 notes that Preferred Office Locations are suitable for employment uses with large floor plates and Policy D.EMP2 requires employment proposals outwith designated areas. Town Centres and accessible locations along major routes to contribute towards integrated place making. These policies indirectly contribute to this SA objective by seeking to ensure that employment land uses are appropriate for their built environment surroundings.</p> <p>There is no clear relationship between the other Employment policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	+	~	~	0
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>These policies seek to concentrate new employment and light industrial uses within highly accessible designated areas, which would support sustainable modal shifts, contribute to climate change mitigation and therefore make a positive contribution to this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	+	+	+	+
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>These policies do not directly contribute to this SA objective. However, these policies seek to concentrate new employment and light industrial uses within highly accessible designated areas, which could indirectly safeguard air quality by maximising public transport commuting rather than increased car travel. As such the policies are predicted to have an indirect minor positive effect on this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	+	+
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective. Some designated areas are within flood risk zones 2 and 3 but employment is an appropriate use within such areas and development will also involve the intensification and re-use of existing areas, so should not increase flood risk, on balance no significant effect is anticipated.</p> <p>Potential effects associated with the location of employment in areas at flood risk are considered in the assessment of strategic sites.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.EMP1: Creating investment and jobs	D.EMP2: New employment space	D.EMP3: Loss of employment space	D.EMP4: Redevelopment within the borough's employment areas	
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> Given that development in the Borough will predominantly involve the use of previously developed land and buildings, which if contaminated, will require appropriate remediation, there is likely to be a positive effect on this objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+	+	+	+



SA Objective	Commentary	Draft Policies								Cumulative Effect of the Draft Policies
		S.TC1: Supporting the network and hierarchy of centres	D.TC2: Retail in our town centres	Policy D.TC3: Retail outside our town centres	D.TC4: Financial and professional services	D.TC5: Food, drink, entertainmen t and the night-time economy	D.TC6 Short stay accommodat ion	Policy D.TC7 Markets		
safe, high quality neighbourhoods with good quality services	<p>None of these policies directly contribute to this SA objective. However, overall the policies aim to ensure that the Borough's town centres are vibrant places at the heart of their communities that the borough's retail and leisure facilities meet the needs of local people and are resilient to future changes. In doing so the policies seek to ensure suitable uses and infrastructure provision in Town Centres and to protect general amenity, resulting in a minor positive effects on this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>									
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>Policies D.TC4 and D.TC5 set out criteria to restrict new certain land uses within the Town Centre hierarchy in the interests of amenity, health protection and social wellbeing. This would reduce the proliferation of uses that might impact on health, resulting in a major positive effect on this SA objective. Policy D.TC7 makes a minor positive contribution by providing an opportunity to access healthy food.</p>	~	~	~	++	++	~	+	+	



SA Objective	Commentary	Draft Policies							<b>Cumulative Effect of the Draft Policies</b>
		S.TC1: Supporting the network and hierarchy of centres	D.TC2: Retail in our town centres	Policy D.TC3: Retail outside our town centres	D.TC4: Financial and professional services	D.TC5: Food, drink, entertainmen t and the night-time economy	D.TC6 Short stay accommodat ion	Policy D.TC7 Markets	
accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p>These policies seek to concentrate main town centre uses (as per the NPPF) within highly accessible Town Centres and other centres. This would link new high footfall development with sustainable transport provision and therefore support sustainable modal shift, resulting in a direct major positive effect on this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>								
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>Policy S.TC1 provides support for new community, cultural and social uses within the town centre hierarchy. This would allow education facilities to be developed in highly accessible locations, resulting in improved opportunities to access education and learning (as well as allowing the Council to fulfil its statutory education duties in respect of children living within defined Town Centres). As such the policy would directly contribute to this SA objective.</p> <p>There is no clear relationship between all other Town Centre policies and this SA objective.</p>	++	~	~	~	~	~	~	0













SA Objective	Commentary	Draft Policies				
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Policy S.CF1 requires development proposals to protect existing community facilities and contribute to the capacity, quality, usability and accessibility of existing facilities. This would directly contribute to this SA objective through increasing opportunities to reduce social exclusion and promote integration through community based activities.</p> <p>Policy D.CF2 sets out criteria to safeguard existing community facilities, which would protect existing opportunities to promote social cohesion and integration and therefore have a positive effect on this SA objective.</p> <p>Policy D.CF3 makes a minor positive contribution to this objective by directing new facilities locations that will be accessible to people living outside the development.</p> <p>Policy D.CF4 seeks to protect existing public houses from development pressures and will make a minor positive contribution to this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	+	+	+	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>Directly in alignment with this SA objective, these policies set out criteria to protect existing services and facilities and to support new ones in accessible and appropriate locations.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>Policy S.CF1 requires development proposals to protect existing facilities and improve them and to deliver new facilities in appropriate locations. This would directly contribute to this SA objective and a significant positive effect is identified.</p> <p>Policy S.CF1 also directs proposals for new health infrastructure/facilities to accessible locations, which would ensure that enhanced infrastructure provision can increase access to healthcare services. As such this policy would directly contribute to this SA objective by addressing issues of wide and equitable access to health care facilities.</p> <p>Policy D.CF2 sets out criteria to safeguard existing community facilities (including health facilities), which will also directly contribute to this objective.</p> <p>Policy D.CF3 seeks to locate new community facilities at accessible locations and ensure that play space provision associated with schools can meet relevant standards.</p> <p>Policy D.CF4 seeks to protect existing public houses from development pressures. This could improve wellbeing through reducing social exclusion and increasing social cohesion, however the net positive effects of the policies are potentially reduced due to potential negative alcohol related health impacts resulting from a proliferation of social facilities and the retention of public houses.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	+	++
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>There is potential for these policies to work in synergy with the housing policies to contribute towards the liveability aspects of this objective, resulting in a significant positive effect.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
	<p><b><u>Uncertainties</u></b></p> <p>None identified.</p>					
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b><u>Likely Significant Effects</u></b></p> <p>Policy S.CF1 and Policy D.CF3 direct proposals for new facilities and services to accessible locations including Town Centres and areas in accessible locations. As such the policies would link new community facility development with sustainable transport provision and could encourage sustainable modal shifts when accessing these facilities and services, resulting in a major positive effect on this SA objective.</p> <p>There is no clear relationship between the other policies and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++	~	++	~	++
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b><u>Likely Significant Effects</u></b></p> <p>Policy S.CF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new community facilities, including education facilities. This would directly contribute to this SA objective through enhancing education opportunities and facilities and supporting the Council in continuing to discharge their statutory education duties.</p> <p>Policy D.CF2 includes criteria for the extension of existing schools and a significant positive effect is identified.</p> <p>Policy D.CF3 provides support for the delivery of an expanded network of pre-school, school, further and higher education facilities and upgraded Ideas Stores (see supporting text to the policy). This would directly contribute to this SA objective through enhancing a range of education opportunities and facilities, which could also increase opportunities for adult learners to retrain or upskill.</p> <p>There is no clear relationship between Policy D.CF4 and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p>	++	++	++	~	++

SA Objective	Commentary	Draft Policies				
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
	<p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>					
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b><u>Likely Significant Effects</u></b> These policies support the provision of high quality education, community, social and cultural facilities in appropriate locations, which would indirectly contribute to this SA objective through providing opportunities for local employment.  Policy D.CF3 would directly contribute to this SA objective by increasing opportunities to access adult, further and higher education facilities and therefore improve skill levels, resulting in reduced worklessness and improved access to employment.</p> <p><b><u>Mitigation</u></b> None required.</p> <p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>	+	+	+	+	+
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b><u>Likely Significant Effects</u></b> These policies support the provision of high quality education, community, social and cultural facilities in appropriate locations, which would indirectly contribute to this SA objective through providing local employment and enabling the growth of certain economic sectors (e.g. arts, leisure &amp; culture).  D.CF2 sets out criteria to protect existing community facilities whilst policy D.CF3 requires proposals to demonstrate a local need for the facility. This would directly contribute to this SA objective through protecting the viability of existing facilities and thereby potentially supporting a range of existing organisations and associated employment.</p> <p><b><u>Mitigation</u></b> None required.</p> <p><b><u>Assumptions</u></b> None identified.</p>	+	+	+	+	++

SA Objective	Commentary	Draft Policies				
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
	<p><b><u>Uncertainties</u></b> None identified.</p>					
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b><u>Likely Significant Effects</u></b> Policy S.CF1 and Policy D.CF3 direct community, cultural and social facilities to locations within the Town Centre hierarchy. This would enhance the vitality of Town Centres and therefore directly contribute to this SA objective (a significant positive effect).  Policy D.CF2 will contribute to this objective as it supports the retention of existing facilities, which could include those in town centre locations and a minor positive effect is identified on this basis.</p> <p><b><u>Mitigation</u></b> None identified.</p> <p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>	++	+	++	+	++
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b><u>Likely Significant Effects</u></b> As drafted there is no clear relationship between the CF policies and this SA objective.</p> <p><b><u>Mitigation</u></b> None identified.</p> <p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>	~	~	~	~	0
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b><u>Likely Significant Effects</u></b> Policy D.CF2 sets out criteria to protect existing community facilities (which could include an element of open space) and also requires that extensions to schools retain or increase the current level of child space. Policy D.CF3 could result in the creation of new open space associated with new schools, minor positive effects are identified on this basis.</p>	~	+	+	~	+

SA Objective	Commentary	Draft Policies				
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
	<p>There is no clear relationship between the other policies and this SA objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>					
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b> Policies S.CF1 and D.CF3 direct proposals for new facilities and services to accessible locations, which could encourage sustainable modal shifts and thus contribute to the climate change SA objective.</p> <p>There is no clear relationship between the other policies and this SA objective.</p> <p><b>Mitigation</b> None identified</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	~	++	~	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b> Policies S.CF1 and D.CF3 direct proposals for new facilities and services to accessible locations, which could encourage sustainable modal shifts and thus contribute to the achievement of this objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	~	++	~	++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b> Policies S.CF1 and D. CF3 provide the opportunity to introduce new open spaces, e.g. associated with schools that could help mitigate flood risk and a minor positive effect is identified against this objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	~	+	~	+
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b></p>	~	~	~	~	0

<b>SA Objective</b>	<b>Commentary</b>	<b>Draft Policies</b>				
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	<b>Cumulative Effect of the Draft Policies</b>
	None identified.					

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2: Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks, including the temporary use of vacant developable sites. The policies would therefore facilitate increased use of open spaces by a range of population groups, which could stimulate increased participation in recreational activities, thereby reducing social exclusion and promoting integration. For these reasons the policies would contribute directly to this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors. In addition to improving physical access and provision the policies require development proposals to safeguard amenity and the existing use of open and water spaces. Therefore the policies would directly contribute to this SA objective through increasing access to a range of open spaces (and, equally, water spaces) and indirectly promoting improvements to public realm.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None required.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors. This would directly protect and enhance access to open space facilities and would also promote increased use of open (and water) spaces for a range of uses including public recreational activities. Consequently the policies would support improved health (physical and mental) and wellbeing outcomes and could also reduce health inequalities. Therefore these policies directly contribute to this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>There is potential for these policies to work in synergy with the housing policies to contribute towards this objective by ensuring that new housing benefits from well-located open space, resulting in a significant positive effect. Policy D.OWS4 also provide criteria relating to the provision of residential moorings.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2: Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b></p> <p>Policies S.OWS2 and D.OWS4 require development proposals to protect navigation and water transport uses from adverse impacts, as well as to enhance the use of water spaces and the network of water spaces. This would safeguard and could also enhance the use of waterways for passenger and freight transport, which would increase transport efficiency and encourage in sustainable modal shifts. As such these two policies would directly contribute to this SA objective resulting in a significant positive effect.</p> <p>Other policies will help ensure that open spaces contribute to the Green Grid and provide well connected open space that will enable walking and cycling. As such, the policies would directly contribute to this SA objective resulting in significant positive effects.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective. However, it should be noted that open spaces and water spaces can provide suitable environments for some learning activities, so their enhancement and protection through these policies has the potential to deliver beneficial outcomes in relation to this SA objective, resulting in a minor positive effect.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2: Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
7. Employment: Reduce worklessness and increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>The requirement within Policies S.OWS2 and D.OWS4 to protect navigation and not to compromise other water uses would safeguard existing economic activity and therefore also employment within existing water spaces and the network of water spaces, in particular ensuring the continuation of water transport activities. However, these policies largely set out safeguards for existing water space uses rather than encouraging economic growth or new employment within them; therefore there is no significant relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~	~	0
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>The requirements within Policies S.OWS2 and D.OWS4 for development proposals to protect navigation and not to compromise other water uses would safeguard existing economic activity and therefore also employment within existing water spaces and the network of water spaces, in particular ensuring the continuation of water transport activities. However, these policies largely set out safeguards for existing water space uses rather than encouraging economic growth or new employment within them; therefore there is no significant relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>Green and water spaces can contribute to the vitality of town centres where they are located within town centres or on their fringes, resulting in the potential for a minor positive effect. .</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	+	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to protect, and enhance the provision and quality of a range of open spaces, water spaces and green corridors. In doing so this could conserve and potentially enhance townscape/neighbourhood character around open spaces, provide new or improved quality space for cultural activities, encourage location sensitive design and protect valued local views. As such these policies directly contribute to this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks. The policies would directly contribute to this SA objective through delivering increased, enhanced and more accessible open space provision (including water spaces).</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified/</p> <p><b>Uncertainties</b></p> <p>None required.</p>	++	++	++	++	++
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks. This would indirectly contribute to climate change adaptation and this SA objective through reducing surface run-off and climate related flood risk from new development proposals.</p> <p>Policy D.OWS4 requires development to demonstrate that it will not contribute to flood risk.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	++	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2: Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks. In addition Policies S.OWS2, D.OWS3 and D.OWS4 require development proposals to enhance biodiversity. All of the policies would therefore directly contribute to this SA objective through conserving, enhancing and improving connectivity between a range of habitats, facilitating biodiversity within new developments, improving access to nature and safeguarding protected species (through habitat protection and enhancement).</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2: Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>Policy S.OWS1 and Policy D.OWS3 require development proposals to protect, develop and enhance the quality of a range of open spaces and green corridors. This would directly help to improve soil quality and indirectly could help to improve air quality (through the aerobic effects of additional hedge and tree planting), resulting in a positive effect on this SA objective. In addition the support for the temporary greening of vacant land within Policy D.OWS3 would improve the appearance of the Borough and could stimulate interest in either bringing the land back into economically productive use or long term use for community benefit; thereby optimising resource usage and contributing to this SA objective.</p> <p>Policy S.OWS2 and D.OWS4 include the requirement to enhance the ecological and biodiversity value of water and will therefore make a significant positive contribution to the achievement of this objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None required.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2: Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to protect, develop and enhance public access to, and the quality of, a range of open spaces, water spaces and green corridors, and also provide support for new allotments and pocket parks. This would indirectly contribute to this SA objective through reducing surface run-off and flood risk from new development proposals.</p> <p>Policy D.OWS4 requires development proposals in or adjacent to the borough's water spaces it will not increase in flood risk. This would directly contribute to this SA objective through reducing the exposure of new developments to fluvial flood risks.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	+	++	+
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b></p> <p>As set out in relation to SA objective 14, the protection, development and enhancement of open spaces required by S.OWS1 and Policy D.OWS3 would help to improve soil quality, whilst the support provided by D.OWS4 for temporary greening would improve the appearance and longer term development potential of vacant and brownfield sites. As such these policies would directly contribute to this SA objective.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	~	++	~	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Policy S.ES1 and Policy D.ES3 require all developments to protect and enhance the natural environment, and Policy S.ES1 specifically identifies the need to improve opportunities to experience nature, in particular in deficient areas. This could prioritise environmental improvements in deprived areas (or areas lacking open spaces) and increase access to environmental assets (e.g. open spaces) for a range of demographic groups, which would help to tackle social exclusion and promote social cohesion and integration. As such the policy makes a significant positive contribution to this SA objective.</p> <p>Policy D.ES2 requires all development proposals to meet or exceed the 'Air Quality Neutral' standard, which ensures all neighbourhoods receive the same minimum treatment when considering air quality issues, regardless of their social or demographic characteristics. This could prevent environmental justice related concerns from arising, resulting in an indirect positive effect on this SA objective.</p> <p>Criterion 3b of Policy D.ES7 and the supporting text to it identify the potential for development to support the Decentralised Energy Network (DEN). If this subsequently results in the deployment of decentralised energy systems in residential developments, this could reduce the exposure of future residents to market prices and enable the provision of subsidised energy for vulnerable groups. Consequently this policy has the potential to indirectly reduce fuel poverty and therefore contribute to this SA objective. Similarly, measures to address water consumption could help address water poverty, although a minor positive effect is identified in this instance.</p> <p>Policies D.ES9 and D. ES10 make a minor positive contribution as they seek to ensure that all communities enjoy a comfortable living environment.</p> <p>There is no clear relationship between policies D.ES4, D.ES5 and D.ES8 and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None required.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	+	++	~	~	+	+	~	+	+	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>Policy S.ES1 identifies the need to improve opportunities to experience nature, in particular in deficient areas, as well as a requirement for all development proposals to protect and enhance the quality of the natural environment. This could result in development proposals providing new open space provision, providing improved access to and/or enhancing the quality of existing open spaces, improving the appearance of localities, and upgrading public realm, all of which would make a significant positive contribution to this SA objective.</p>	++	++	+	+	+	~	~	~	++	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>Policy D.ES2 seeks to secure air quality neutral development, contributing to a high quality public realm and reducing the impacts of pollution on the public realm, a significant positive contribution to this SA objective.</p> <p>Policy D.ES3 relates to the protection and enhancement of biodiversity and a minor positive effect in relation to liveability is identified as this will also contribute to liveable neighbourhoods.</p> <p>Policy D.ES4 sets out a pro-active approach to flood risk management which promote liveable and safe areas.</p> <p>Policy D.ES5 provides the opportunity to provide multi-functional open spaces and a minor positive effect is identified on this basis.</p> <p>Policy D.ES9 directly contributes to this SA objective through safeguarding noise sensitive receptors from adverse noise impacts resulting from development proposals. A significant positive effect is therefore anticipated.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>											
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>Policy S.ES1 identifies the need through biodiversity protection and enhancement to improve opportunities to experience nature, in particular in biodiversity deficient areas, which could be beneficial to mental and physical health. It also identifies the need to mitigate the adverse effects of contaminated land on human health. The policy also requires development to contribute towards achievement of the Borough's Air Quality Action Plan. These criterion would enhance open space provision, thereby encouraging increased recreational activity with associated positive health outcomes, as well as reducing existing health risks from contamination. As such the policy directly contributes to this SA objective.</p> <p>Policy D.ES2 sets out criteria to ensure that development proposals safeguard air quality and, through design, reduce exposure to air pollution. This would protect the physical health of both users of a development proposal and, in the case of developments with wider potential air quality effects, the wider public, resulting in a significant positive effect in relation to this objective.</p> <p>Policy D.ES3 sets out criteria to ensure that development proposals protect and enhance biodiversity interests. This could indirectly enhance open space provision and result in other environmental improvements with consequential indirect positive health and wellbeing impacts, including through increased</p>	++	++	++	+	+	~	~	++	++	++	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>active travel and recreational activities. As such the policy directly contributes to this SA objective.</p> <p>Policy S.ES1 and Policies D.ES4 and 5 set out a proactive approach to flood risk management which is likely to reduce flood risks and associated fears, whilst restricting development in flood risk areas that could be retained for recreational use. Therefore these policies could indirectly help to safeguard mental health and improve people's physical health and quality of life. A minor positive effect on this SA objective is identified for both D.ES4 and ES5.</p> <p>Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land and to control the storage and management of hazardous substances. These criteria seek to protect the environment, human health and general amenity from unacceptable impacts whilst enabling appropriate development proposals to proceed. Owing to the focus on protecting and enhancing human health the policy would directly contribute to this SA objective.</p> <p>Policy D.ES9 contributes to this SA objective through safeguarding noise sensitive receptors from adverse noise impacts (from development proposals), which would help to safeguard the physical and mental health and wellbeing of residents.</p> <p>Policy D.ES10 requires new development to avoid contributing to overheating which will have a significant positive effect on this objective.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>											
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between the Environmental Sustainability policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~	~	~	~	~	~	~	~	0
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport,	<p><b>Likely Significant Effects</b></p> <p>Policy S.ES1 and Policy D.ES2 will contribute to this objective by requiring development to deliver air quality neutral development and, in the case of Policy SES1 contribute to the objectives of the Borough's Air Quality Action Plan.</p>	++	++	~	+	+	~	~	~	~	~	+



SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<b>Uncertainties</b> None identified.											
9. Town Centres: Promote diverse and economically thriving town centres.	<b>Likely Significant Effects</b> Policy S.ES1 and Policy D.ES2 will contribute to this objective by requiring development to deliver air quality neutral development and, in the case of Policy S.ES1 contribute to the objectives of the Borough's Air Quality Action Plan. This will help maintain the attractiveness of town centres. Policies D.ES4 and 5 relate to flood risk and could contribute to this objective by helping to avoid flood risk in town centres. Policies D.ES9 and D.ES10 seek to avoid noise pollution and overheating. They will help achieve this objective by encouraging an attractive built environment that will help maintain the vitality of town centres. There is no clear relationship between other policies and this SA objective. <b>Mitigation</b> None required. <b>Assumptions</b> None identified. <b>Uncertainties</b> None identified.	+	+	~	+	+	~	~	~	++	++	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<b>Likely Significant Effects</b> By ensuring that development proposals adequately mitigate predicted environmental and amenity impacts and by proactively managing flood risk, these policies would ensure that natural and cultural heritage assets, including those which contribute to landscapes/townscapes, are protected from adverse development impacts and from the damaging effects of flooding. Therefore these policies would have a minor positive effect on this SA objective. Policy D.ES9 and D.ES10 seeks to protect the built environment and could also contribute to this objective by protecting heritage and cultural assets and their settings and people's ability to enjoy them. <b>Mitigation</b> None required. <b>Assumptions</b> None identified. <b>Uncertainties</b> None identified.	+	+	+	+	+	+	+	+	++	++	+
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<b>Likely Significant Effects</b> Policy S.ES1 and Policy D.ES2 require all developments to protect and enhance the natural environment, and Spatial Policy S.ES1 specifically identifies the need to improve opportunities to experience nature, in particular in deficient areas. This could increase access to and improve the quality of open space provision, including through encouraging	++	+	++	~	~	~	~	~	+	+	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>new open space provision in areas of scarcity, which would have a significant positive effect on this SA objective.</p> <p>Policy D.ES2 requires that where open space would be located in an areas of sub-standard air quality that the position and design of the open space reduces exposure of future users to air pollution resulting in a positive effect on this SA objective.</p> <p>Policies D.ES9 and D.ES10 seek to avoid noise pollution and overheating. They will help achieve this objective by encouraging an attractive built environment that will help maintain the quality of existing open spaces.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>											
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b> These policies directly contribute to this SA objective through encouraging sustainable design, construction and use of new developments to reduce greenhouse gas emissions and adapt to climate change. In particular the policies seek to maximise energy efficiency, promote onsite energy generation from renewable energy sources, enable district heating, reduce water consumption, reduce flood risks and avoid overheating, which is likely to increase resilience and reduce vulnerability to climate change impacts.</p> <p>There is no relationship between this objective and policy D.ES9.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	++	++	++	++	++	++	~	++	++	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b> Policy S.ES1 and Policy D.ES3 require all developments to protect and enhance biodiversity, and in doing so Policy S.ES1 requires developments to increase access to nature and to contribute to meeting the objectives of the latest Tower Hamlets Biodiversity Action Plan and the Thames River Basin Management Plan. The policies would ensure that development proposals protect, conserve and enhance a variety of habitats, designated sites, and protected species, and could also indirectly encourage greater habitat</p>	++	+	++	+	+	+	+	~	~	+	

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>connectivity, resulting in major positive effects on this SA objective.</p> <p>Other Environmental Sustainability policies provide the opportunity to protect and where possible enhance environmental, including biodiversity, interests and amenity, resulting in indirect positive effects on this SA objective, for example D.ES5 relating to sustainable drainage could provide biodiversity benefits, depending on the methods used in a particular development.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>											
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>All policies make a significant contribution to the achievement of this objective. Specifically:</p> <p>Policies S.ES1 and D.ES2 set out criteria to ensure that development proposals safeguard air quality and, through design, reduce exposure to air pollution.</p> <p>Policies S.ES1 and D.ES3 require all developments to protect and enhance biodiversity, which would include protecting and improving soil resources.</p> <p>Policies S.ES1, D.ES4 and ES5 set out a pro-active approach to flood risk management, which would ensure that development proposals contribute to sustainable drainage practices and the protection of water quality.</p> <p>Policy D.ES6 requires development proposals to minimise water consumption and pressure on the combined sewer network, thereby ensuring the minimisation of water use.</p> <p>Policy D.ES7 will help reduce use of non renewable resources associated with energy generation.</p> <p>Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land subject in order to safeguard environmental and amenity interests. This provides a framework to allow the appropriate redevelopment of brownfield land.</p> <p>There is not relationship between Policies D.ES9 and D.ES10.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	++	++	++	++	++	++	~	~	++	
15. Flood risk reduction and management: To minimise and	<p><b>Likely Significant Effects</b></p> <p>Policy S.ES1 and Policies D.ES4 and 5 set out a pro-active approach to flood risk management, which directs</p>	++	~	~	++	++	+	~	~	~	~	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
manage the risk of flooding	<p>development away from flood risk areas and therefore minimises flood risks to people and property. Policy D.ES5 also sets out criteria to ensure surface run-off is kept within acceptable limits and encourages the use of SUDS. As such these policies directly contribute to this SA objective through requiring flood risk and drainage to be managed sustainably.</p> <p>The requirement within Policy D.ES6 for development proposals to minimise impacts on water supply and sewerage networks would indirectly contribute to this SA objective through reducing potential flood risks.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p>There is not relationship between Policies D.ES9 and D.ES10.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>											
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> Policy S.ES1 sets the context for D.ES8 on contaminated land, making a minor positive contribution to this objective.</p> <p>Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land subject in order to safeguard environmental and amenity interests. This provides a framework to allow the appropriate redevelopment of brownfield land whilst reducing human health impacts arising from existing contaminated land, and therefore makes a significant positive contribution to this SA objective.</p> <p>There is no clear relationship between these the other Environmental Sustainability policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>		+	~	~	~	~	~	~	++	~	~

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b> There is no clear relationship between the policies and this SA objective.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None required.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	0
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b> S.MW1 will contribute to this objective by safeguarding existing waste management facilities and identifying suitable areas of search for new facilities. D.MW2 includes criteria to protect the amenity of existing uses where new waste facilities are proposed and a significant positive effect is identified. Policy D.MW3 will contribute to liveable neighbourhoods by ensuring that adequate waste management is in place at the development level and a minor positive effect is identified.</p> <p><b>Mitigation</b> None identified.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	++	+	+
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b> Policy S.MW1 safeguards existing sites for waste recycling and treatment capacity and identifies sites for new facilities, providing the basis for avoiding development proposals that would prejudice these uses and any associated health impacts. Policy D.MW2 identifies the need for new waste management proposals to be enclosed and to consider impacts on amenity, including emissions to air resulting in a positive effect. Policy D.MW3 will contribute to this objective by ensuring that provisions for managing waste are incorporated in developments.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None required.</p>	+	+	+	+
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b> There is no clear relationship between the policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	0

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b> Policy D.MW2 seeks to ensure that new waste management facilities do not result in adverse transport impacts, resulting in a minor positive effect against this objective. There is no clear relationship between other policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	+	~	0
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	0
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b> S.MW1 seeks to safeguard existing waste management facilities and identifies areas of search for new ones this could contribute to employment in the Borough in the waste management sector resulting in a minor indirect effect. There is no clear relationship between the other policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	~	~	0
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b> Policies S.MW1, D.MW2 and D.MW3 could contribute to employment in the Borough in the waste management sector resulting in an indirect positive effect on this objective. .</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+	+	+
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b> There is no clear relationship between the policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p>	~	~	~	0

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
	<p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>				
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b> By directing waste management facilities to appropriate sites and ensuring that development proposals adequately mitigate predicted environmental and amenity impacts these policies would ensure that natural and cultural heritage assets, including those which contribute to landscapes/townscapes, are protected from adverse development impacts. Therefore these policies would have a minor positive effect on this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+	+	+
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b> There is no clear relationship between the policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	0
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b> These policies directly contribute to this SA objective by encouraging measures to minimise carbon emissions and maximise the use of lower carbon energy sources, the minimisation of waste generation, enabling waste segregation and recycling. A significant positive effect is anticipated.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	++	++	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b> Policies S.MW1, D.MW2 and D.MW3 make a positive contribution to this objective by seeking to manage the environmental impacts of managing waste, including transport related factors that could impact on biodiversity.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	+	+	~	+

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b> Policies S.MW1, D.MW2 and D.MW3 set out a strategy and development management criteria to provide waste management facilities, minimise residual waste generation from new developments and manage it thereby encouraging the growth of the circular economy.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	++	++	++	++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b> There is no clear relationship between the policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	0
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> There is no clear relationship between the other policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit- free	D.TR4: Sustainable Delivery and Servicing	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>S.TR1 directs high trip generating development proposals to the town centre hierarchy and locations with high levels of public transport accessibility, which would indirectly help to reduce social exclusion and therefore contribute to this SA objective.</p> <p>There is no clear relationship between the other transport and connectivity policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	~	~	~	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to safeguard, develop and enhance the Borough's transport network, in particular the public transport system, and Policy S.TR1 also directs high trip generating developments to highly accessible locations. The policies would therefore directly contribute to this SA objective through enhancing access, in particular using public transport, to services, facilities and amenities, and through providing adequate transport infrastructure, as well as indirectly catalysing improvements to public realm around transport improvement projects.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit-free	D.TR4: Sustainable Delivery and Servicing	
	<p><b><u>Uncertainties</u></b></p> <p>None identified.</p>					
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b><u>Likely Significant Effects</u></b></p> <p>Policy S.TR1 directly contributes to this SA objective through directing high trip generating developments to highly accessible locations, which would both direct health, leisure and community facilities to highly accessible locations and further improve their accessibility, in particular using public transport.</p> <p>Policy D.TR2 sets out measures to address potential increases in congestion arising from development proposals, which could otherwise increase local air pollution and cause/exacerbate health problems and impact on safety.</p> <p>Policy D.TR3 requires new developments to include adequate cycle parking provision and to contribute towards cycle docking stations. This would increase cycling within the Borough, resulting in improved physical health through exercise and a direct major positive effect on this SA objective.</p> <p>Policy D.TR4 requires the prioritisation of sustainable freight transport modes, which would reduce construction and other freight transport journeys by road. This could reduce or avoid traffic congestion and associated air quality impacts, resulting in an indirect positive effect on this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++	-++	++	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit-free	D.TR4: Sustainable Delivery and Servicing	
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b>Likely Significant Effects</b></p> <p>Policy S.TR1 contributes to this objective by helping to ensure that public transport is well related to development, including housing development. Policy D.TR3 requires parking provision for affordable family homes and accessible properties, both are assessed as a minor positive effect.</p> <p>There is no clear relationship between the other transport and connectivity policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	~	+	~	0
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b>Likely Significant Effects</b></p> <p>These policies directly contribute to this SA objective as they require development proposals to safeguard, develop and enhance the Borough's transport network, in particular the public transport system. Policy S.TR1 commits to transport improvements, directs high trip generating developments to highly accessible locations and requires development proposals to be integrated with the public transport network, which would increase capacity and encourage sustainable modal shifts. All other transport and connectivity policies would similarly enhance the functioning of the Borough's transport network and the public transport system.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit-free	D.TR4: Sustainable Delivery and Servicing	
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b>Likely Significant Effects</b></p> <p>These policies would not directly contribute to this SA objective. However, Policy S.TR1 would indirectly contribute through directing new educational facilities, as high trip generating developments, to highly accessible locations, requiring their integration with the public transport network, and also committing to transport network improvements. This would ensure good physical access to education and learning opportunities, which is an essential prerequisite for the local population to develop new skills and knowledge.</p> <p>There is no clear relationship between the other transport and connectivity policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None required.</p>	+	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit-free	D.TR4: Sustainable Delivery and Servicing	
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b>Likely Significant Effects</b></p> <p>These policies would not directly contribute to this SA objective. However, Policy S.TR1 would indirectly contribute through directing major employment developments resulting in high trip generation to highly accessible locations, requiring their integration with the public transport network, and committing to transport network improvements. This would ensure good physical access to employment opportunities, in particular using public transport, which would remove any barriers to employment which can occur through lack of car ownership or poor public transport connections.</p> <p>There is no clear relationship between the other transport and connectivity policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None identified</p> <p><b>Assumptions</b></p> <p>None identified</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit-free	D.TR4: Sustainable Delivery and Servicing	
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>These policies directly contribute to this SA objective as they require development proposals to safeguard, develop and enhance the Borough's transport network, in particular the public transport system and the efficient management of freight. Protecting and enhancing the functioning, capacity and connectivity of the transport network, including through infrastructure improvements as outlined in Policy S.TR1, would directly enable economic growth through improving the reliance of local businesses, supporting new businesses and employment opportunities, and stimulating regeneration in specific areas.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	++	++	++
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>Policy S.TR1 directs high trip generating developments to locations within the town centre hierarchy, which would directly increase footfall within and the vitality of Town Centres, whilst ensuring that services and facilities are provided in accessible locations to meet the needs of residents. As such this policy directly contributes to this SA objective.</p> <p>All of the other policies indirectly contribute to this SA objective as they require development proposals to safeguard, develop and enhance the Borough's transport network, including avoiding unacceptable adverse amenity and traffic impacts. This would minimise congestion and ensure the proper functioning of the overall transport network, in particular within busy areas such as Town Centres.</p>	++	+	+	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit-free	D.TR4: Sustainable Delivery and Servicing	
	<p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>					
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	0
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit-free	D.TR4: Sustainable Delivery and Servicing	
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>These policies directly contribute to this SA objective as they set out criteria to safeguard, development and enhance the public transport system. In particular Policy S.TR1 commits to transport improvements, directs high trip generating developments to highly accessible locations and requires development proposals to be integrated with the public transport network, which would increase capacity and encourage sustainable modal shifts. All other policies would similarly enhance the functioning of the Borough's public transport system and either directly or indirectly would concentrate development in accessible locations and encourage sustainable modal shifts.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	+	++	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit-free	D.TR4: Sustainable Delivery and Servicing	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b>Likely Significant Effects</b></p> <p>These policies require development proposals to safeguard, develop and enhance the Borough's transport network, especially the public transport system. In particular Policy D.TR2 seeks to prevent congestion on the Local and Strategic Road network or/and public transport, which could otherwise increase local air pollution and cause/exacerbate health problems. Throughout these policies the priority afforded to public transport would encourage sustainable modal shifts which could improve air quality from traffic reduction, and air quality could also be improved through mitigation measures provided by the Council and developers of specific projects. As such these policies would contribute to this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	++	+	+	+
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b>Likely Significant Effects</b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.TR1: Sustainable travel	D.TR2: Impacts on the transport network	D.TR3: Parking and permit-free	D.TR4: Sustainable Delivery and Servicing	
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b>Likely Significant Effects</b> There is no clear relationship between these policies and this SA objective.</p> <p><b>Mitigation</b> None required.</p> <p><b>Assumptions</b> None identified.</p> <p><b>Uncertainties</b> None identified.</p>	~	~	~	~	0



## Appendix M

### Appraisal Matrices for Sites



## Appendix M: SA Matrices for Strategic Sites

Site Name:	Ailsa Street			
Site Area (ha):	5.76			
Sustainability Objective	Basis for appraising sites	Score Reg 18	Score Reg 19	Commentary / Mitigation
1. <b>Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.	++	++	At Regulation 18 stage it was noted that the site allocation highlighted that Poplar Public Library and Bromley Hall lie within the site and it required development proposals to protect and enhance designated heritage assets, implying that these would be retained, however a score of no significant effect was awarded on the basis that the Regulation 18 Local Plan only identified the need for open space and a new primary school at this site. The site has been appraised on the same basis at Regulation 19 stage.
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough			
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
2. <b>Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			At Regulation 18 stage it was noted that the site allocation highlighted that Poplar Public Library and Bromley Hall lie within the site and it required development proposals to protect and enhance designated heritage assets, implying that these would be retained, however a score of no significant effect was awarded on the basis that the Regulation 18 Local Plan only identified the need for open space and a new primary school at this site. The site has been appraised on the same basis at Regulation 19 stage.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.
3. <b>Health and wellbeing:</b> Improve the health and wellbeing of the				

Site Name:	Ailsa Street			
Site Area (ha):	5.76			
Sustainability Objective	Basis for appraising sites	Score Reg 18	Score Reg 19	Commentary / Mitigation
population and reduce health inequalities.	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	Assessed on the basis that has potential for 500+ dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b			PTAL 1a -3 (scored on the basis of the higher rating at Reg 19 stage. Score at Reg 18 stage reflects older data). Design Principles for the site in the Regulation 19 Local Plan include: <ul style="list-style-type: none"> <li>the need to improve walking and cycling connections to, from and within the site, specifically to and along the River Lea, to Bromley-by-Bow district centre, Aberfeldy neighbourhood centre and to Langdon Park DLR station. These should align with the existing urban grain to support permeability and legibility.</li> <li>support the provision of new and improved A12 and River Lea crossings.</li> </ul>
	+ Site lies within PTAL 3 or 4		+	
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b	--		
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			
6. <b>Education:</b> Increase and improve the provision of and access to	++ Site includes provision of a new school that will meet wider needs.	++	++	New Primary School proposed in both Regulation 18 and 19 versions of the Local Plan.

Site Name:	Ailsa Street			
Site Area (ha):	5.76			
Sustainability Objective	Basis for appraising sites	Score Reg 18	Score Reg 19	Commentary / Mitigation
childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	+ Site safeguards/expands an existing school on site.			There is existing employment capacity on site and this was highlighted in the Regulation 18 SA. The proposed land uses in the Regulation 19 Local Plan include the re-provision of existing employment by way of intensification of employment on site, including complementary commercial uses which support SME, creative industries and retail, a minor positive benefit is identified on this basis.
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			There is existing employment capacity on site and this was highlighted in the Regulation 18 SA. The proposed land uses in the Regulation 19 Local Plan include the re-provision of existing employment by way of intensification of employment on site, including complementary commercial uses which support SME, creative industries and retail, a minor positive benefit is identified on this basis.
	+ Site includes provision for employment related development.		+	
	0 Housing led scheme on land not in existing employment use.	0		
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			The site is adjacent to but not within the Gillender Street Local Industrial Location. The site allocation does include employment uses.
	+ Site would provide employment in a Local Office Location (LEL).			
	0 Site does not provide employment and does not impact on existing employment areas.	0	0	

<b>Site Name:</b>	<b>Ailsa Street</b>			
<b>Site Area (ha):</b>	<b>5.76</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score Reg 18</b>	<b>Score Reg 19</b>	<b>Commentary / Mitigation</b>
<b>9. Town Centres:</b> Promote diverse and economically thriving town centres.	- Development would result in the loss of employment in a LEL			The site lies outside of a town centre and is not proposed for main town centre uses.
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF)			The site contains Statutory Listed Building LB961, LB103(a) (Grade II) & LB104(a) (Grade II*), wholly within an Archaeological Priority Area and partially within the Limehouse Cut Conservation Area. The potential for a significant negative effect in the absence of mitigation has been identified (Reg 18) because of the presence of these features.  The Development Principles for the Sub-area in the Reg 19 Local Plan include the need to explore the opportunity for creative adaption and re-use of existing heritage buildings, and ensure they are well integrated into new development.  The Design Principles for the site in the Reg 19 Local Plan identify the need to protect or enhance and integrate heritage
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.			
	0 Site outside of a town centre and other criteria do not apply.	0	0	
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>1</sup> that includes main town centre uses. <sup>2</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			
	++ Potential for a Listed Building to be brought back into beneficial use.			
	+ Potential for a locally listed building to be brought back into use.		+	
	0 Used if none of the other criteria apply.			
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.	-/?		

<sup>1</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>2</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<b>Site Name:</b>	<b>Ailsa Street</b>			
<b>Site Area (ha):</b>	<b>5.76</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score Reg 18</b>	<b>Score Reg 19</b>	<b>Commentary / Mitigation</b>
	? Score uncertain if site is within 400m of a Conservation area or designated site.			<p>assets on site, including Poplar Public Library and Bromley Hall, and in the surrounding areas within the borough and the London Borough of Newham. A minor positive effect has been identified on this basis.</p> <p>The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing Views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.</p>
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++		<p>At the Reg 18 stage it was assumed that the Open Space provided on site would be strategic in scale.</p>
	+ Site includes open space provision but only sufficient to meet the needs of the development.		+	<p>The Reg 19 Local Plan envisages 0.4ha open space provision so this has been assessed on the basis that it will not be strategic in nature. The Design Principles for the site also highlight the need to improve riverside accessibility and the potential to improve access to the Lea River Park and Queen Elizabeth Olympic Park. A minor positive benefit is identified on this basis.</p>
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			
	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			

Site Name:	Ailsa Street			
Site Area (ha):	5.76			
Sustainability Objective	Basis for appraising sites	Score Reg 18	Score Reg 19	Commentary / Mitigation
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Adjacent to The River Thames and tidal tributaries SINC and the potential for a negative effect was identified at the Regulation 18 stage.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	The Development Principles for the sub-area identify the opportunity for development to contribute to biodiversity and ecology by bringing green spaces and wetland back into the built environment. The Design Principles for Ailsa Street highlight the opportunity to improve biodiversity and ecology along the water edges and within open spaces and a minor positive effect has been identified on this basis at Regulation 19 stage. .
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1			The site lies within Flood Zones 3a. The potential for a significant negative effect has therefore been identified.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			The Delivery Considerations for the site at Regulation 19 stage include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to
	--Site is partially or wholly within flood zone 3 a or 3b	--	--	

<b>Site Name:</b>	<b>Ailsa Street</b>			
<b>Site Area (ha):</b>	<b>5.76</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score Reg 18</b>	<b>Score Reg 19</b>	<b>Commentary / Mitigation</b>
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).	++	++	The site includes brownfield land and is also identified as containing vacant land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).			
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Aspen Way</b>			
<b>Site Area (ha):</b>	<b>6.10</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.	+	+	
	0 Site is within 50% least deprived LSOAs in the Borough			
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			Strategic open space, considered in IIA objective 11 and re-provision of college considered at Objective 6. Re-provision of community centre identified in the design principles at Regulation 19 stage so minor positive effect under this objective.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.		+	
	0 Housing or employment with no new facilities provided.	0		
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.
	+ Site safeguards an existing health facility.			

Site Name:	Aspen Way			
Site Area (ha):	6.10			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>4. Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	0 No new health facilities proposed on site	0	0	Assessed on the basis that has potential for 500+ dwellings.
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
<b>5. Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	2017 data indicates that the site sits across PTAL 3-5 and it has been appraised on this basis at regulation 19 Stage. The score at Reg 18 stage reflected older data. The Design Principles for the site identify the potential to create walking and cycling connections across Aspen Way which could improve connectivity.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
	++ Site lies within PTAL 5 or 6a/b		++	

Site Name:	Aspen Way			
Site Area (ha):	6.10			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
6. <b>Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.			Tower Hamlets College occupies part of the site and the Regulation 19 version of the Local Plan identifies the need to re-provide this. A minor positive effect is identified on this basis. The Regulation 18 plan did not include this as a requirement for the site.  No new schools proposed. Closest existing Primary School is Holy Family Catholic School 263m away and closest existing Secondary School is The Blessed John Roche Roman Catholic School 579m away.
	+ Site safeguards/expands an existing school on site.		+	
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.	0		
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
7. <b>Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			The land uses required at Regulation 19 stage include employment: compatible commercial uses, including SME and retention of an existing DLR Depot. The Regulation 19 Plan performs better than the Regulation 18 Local Plan, which just highlighted the need for employment provision without being explicit about the need to accommodate existing employment on site and a neutral score was given on that basis.
	+ Site includes provision for employment related development.		+	
	0 Housing led scheme on land not in existing employment use.	0		
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
8. <b>Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			The site lies north of (i.e. outside) Canary Wharf Preferred Office Location and west of Local Industrial Location. The preferred uses for the site include employment land.
	+ Site would provide employment in a Local Employment Location (LEL).			

Site Name:	<b>Aspen Way</b>				
Site Area (ha):	<b>6.10</b>				
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation	
9. Town Centres: Promote diverse and economically thriving town centres.	0 Site does not provide employment and does not impact on existing employment areas.	0	0	No significant effect identified on the basis that the site is not within any of the policy areas identified, although some employment will be provided on site.	
	- Development would result in the loss of employment in a LEL				
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.				
	? Impact on SIL, POL and LEL is uncertain.				
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			No main town centre uses proposed.	
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.				
	0 Site outside of a town centre and other criteria do not apply.	0	0		
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>3</sup> that includes main town centre uses. <sup>4</sup>				
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses				
	? Uncertain if site will include town centre uses.				
	++ Potential for a Listed Building to be brought back into beneficial use.				
	+ Potential for a locally listed building to be brought back into use.		+-	The site is partially within an Archaeological Priority Area and a minor negative effect was identified on that basis at Regulation 18 stage. The Design Principles for the site identify the need to respect and respond positively to the existing character, scale, height, massing and urban grain of the surrounding built environment, which includes the St Mathias Church Poplar Conservation Area and adjacent listed buildings. As the site lies within an Archaeological Priority Area the potential for a minor negative effect remains.	
	0 Used if none of the other criteria apply.				
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area)	-			
	Or Site is within a valued local view				

<sup>3</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>4</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Aspen Way			
Site Area (ha):	6.10			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.			The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
	? Score uncertain if site is within 400m of a Conservation area or designated site.			
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++	++	Includes strategic scale open space provision, including re-provision of football pitches.
	+ Site includes open space provision but only sufficient to meet the needs of the development.			
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			
	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			No designations within threshold distances. .
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			

Site Name:	Aspen Way			
Site Area (ha):	6.10			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	0 if criteria identified for other scores do not apply.	0	0	
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.			
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1			Flood Zones 3a.  The delivery considerations in the Regulation 19 Local Plan include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).	++	++	Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. Appraised on the basis that this is a 6.10ha site, score at Reg 18 stage corrected from 'minor positive' as was based on a smaller site area.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).			
	0 – Site safeguarded for existing use.			

<b>Site Name:</b>	<b>Aspen Way</b>			
<b>Site Area (ha):</b>	<b>6.10</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Scor e</b>	<b>Reg 19 Scor e</b>	<b>Commentary / Mitigation</b>
	<p>- Site involves the loss of previously undeveloped land (less than 5ha).</p> <p>-- Site involves the loss of previously undeveloped land (5ha or more).</p>			

<b>Site Name:</b>	<b>Billingsgate Market</b>			
<b>Site Area (ha):</b>	<b>5.74</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities proposed (school acknowledged under objective 6).
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.

<b>Site Name:</b>	<b>Billingsgate Market</b>			
<b>Site Area (ha):</b>	<b>5.74</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Reg 18 Score</b>	<b>Reg 19 Score</b>
population and reduce health inequalities.	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	Assessed on the basis that has potential for 500+ dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		++	2017 data indicates that the site sits across PTAL 3-5 and a significant positive effect is identified on this basis. The score for the Regulation 18 plan reflects older data.  The delivery considerations for the site at Regulation 19 stage include the need to deliver improved pedestrian and cycling routes across Aspen Way and safeguard the long term aspiration of a new crossing through the decking.
	+ Site lies within PTAL 3 or 4	+		
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

<b>Site Name:</b>	<b>Billingsgate Market</b>			
<b>Site Area (ha):</b>	<b>5.74</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.	++	++	The score at Regulation 18 stage was on the basis that the site might be required to provide a new Primary or Secondary School. The Regulation 19 Local Plan confirms that a new secondary school is required.
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			Regulation 19 score reflects the fact that employment is proposed on site include strategic office space with supporting uses such as gyms, hotels, restaurants and retail within the POL and compatible commercial uses outside of the POL, including SME. The need to relocate the wholesale market is also acknowledged. Regulation 18 score corrected from 0 to minor positive as the plan also included employment at this location and the need to relocate the market.
	+ Site includes provision for employment related development.	+	+	
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
<b>8. Economic Growth:</b> Create and sustain local economic growth	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).	++	++	Allocation includes employment development, including some within the Canary Wharf POL and other employment uses outside of the POL. of the

<b>Site Name:</b>	<b>Billingsgate Market</b>			
<b>Site Area (ha):</b>	<b>5.74</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
across a range of sectors and business sizes.	+ Site would provide employment in a Local Employment Location (LEL).			Local Plan also requires that Billingsgate Market is re-provided, within or outside of the Borough. Regulation 18 score corrected from significant negative to significant positive as the Regulation 18 Local Plan did include employment on site and the need to re-provide the market.
	0 Site does not provide employment and does not impact on existing employment areas.			
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
9. <b>Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			No main town centre uses proposed, however site is adjacent to Canary Wharf Major Centre and it is proposed to extend the Tower Hamlets Activity Area north of Canary Wharf.
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.			
	0 Site outside of a town centre and other criteria do not apply.	0	0	
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>5</sup> that includes main town centre uses. <sup>6</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			
10. <b>Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Potential for a Listed Building to be brought back into beneficial use.			Contains Statutory Listed Building LB732 (Grade II), the Accumulator Tower and the potential for a significant negative effect was identified on that basis at Regulation 18 stage.
	+ Potential for a locally listed building to be brought back into use.		+	
	0 Used if none of the other criteria apply.			

<sup>5</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>6</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Billingsgate Market			
Site Area (ha):	5.74			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			The Design Principles for the site in the Regulation 19 Local Plan highlight the need to protect or enhance the accumulator tower and its surroundings and a minor positive effect is identified on that basis.
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.	+/?		The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
	? Score uncertain if site is within 400m of a Conservation area or designated site.			
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.			Does not include strategic open space provision. However it was assumed at Regulation 18 stage that the site would provide open space to meet local need. The Regulation 19 Local Plan confirms the provision of 0.4 ha of open space and a minor positive effect is identified on that basis.
	+ Site includes open space provision but only sufficient to meet the needs of the development.	+/?	+	
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			
	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			

Site Name:	Billingsgate Market			
Site Area (ha):	5.74			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	? Not used – see above.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Adjacent to Millwall and West India Docks SINC, within 25m of Blackwall Basin SINC, 95m of Poplar Dock SINC.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	The Design Principles for the site included at Regulation 19 stage include the need to improve biodiversity and ecology along the water edges and within open spaces. A minor positive effect is identified on this basis.
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			Other policies in the Draft Local Plan should also help to avoid negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	? Impact on biodiversity is uncertain			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1			The site sits cross Flood Zones 2-3a.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations in the Regulation 19 Local Plan include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test.
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	--Site is partially or wholly within flood zone 3 a or 3b	--	--	Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to

<b>Site Name:</b>	<b>Billingsgate Market</b>			
<b>Site Area (ha):</b>	<b>5.74</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).	++	++	Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).			
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Bishopsgate Goods Yard</b>			
<b>Site Area (ha):</b>	<b>4.24</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			Potential requirement for an Idea Store identified at Regulation 18 stage and the site was appraised on that basis (minor positive effect). The Regulation 19 Local Plan identifies the need for a community / local presence facility and a minor positive effect is identified on that basis.
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			Potential requirement for an Idea Store identified at Regulation 18 stage and the site was appraised on that basis (minor positive effect). The Regulation 19 Local Plan identifies the need for a community / local presence facility and a minor positive effect is identified on that basis.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.	+	+	
	0 Housing or employment with no new facilities provided.			
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
	++ Site includes provision of a new health facility that will serve the wider community.			
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.	+ Site safeguards an existing health facility.			No new health facilities proposed on site.

Site Name:	Bishopsgate Goods Yard			
Site Area (ha):	4.24			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>4. Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	0 No new health facilities proposed on site	0	0	Assessed on the basis that has potential for 500+ dwellings.
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
<b>5. Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	PTAL 6a-b.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
	++ Site lies within PTAL 5 or 6a/b	++	++	
<b>6. Education:</b> Increase and improve the provision of and	+ Site lies within PTAL 3 or 4			
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			
	++ Site includes provision of a new school that will meet wider needs.			No new schools proposed. Closest existing Primary School is St Matthias Church of England Primary

<b>Site Name:</b>	<b>Bishopsgate Goods Yard</b>			
<b>Site Area (ha):</b>	<b>4.24</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	+ Site safeguards/expands an existing school on site.  0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.  - Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away  - Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.  ? Impacts on education facilities are uncertain.			School 75m away and closest existing Secondary School is St Bernard's School 365m away.
7. <b>Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.  + Site includes provision for employment related development.  0 Housing led scheme on land not in existing employment use.  - Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).  -- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).  ? Impact on existing employment is uncertain.		+	The Regulation 19 Local Plan identifies the need for compatible commercial uses, including SME.
8. <b>Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).  + Site would provide employment in a Local Employment Location (LEL).	++	++	The site allocation would provide employment within the City Fringe

Site Name:	Bishopsgate Goods Yard			
Site Area (ha):	4.24			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>9. Town Centres:</b> Promote diverse and economically thriving town centres.	0 Site does not provide employment and does not impact on existing employment areas.			Site is partially within / close to the Brick Lane district centre. Proposed retail frontages on the eastern edge of the site are likely to be within the designated Town Centre, with other employment uses just outside of the Town Centre.
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Contains Statutory Listed Building LB910 (Grade II) and partially within the Fournier Street CA and the potential for a significant negative effect was identified on that basis at Regulation 18 stage.  The Regulation 19 Local Plan identifies the need to protect or enhance the existing Grade II Listed Braithwaite Viaduct and other heritage assets and sensitively consider its impacts on the conservation
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.			
	0 Site outside of a town centre and other criteria do not apply.	+	+	
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>7</sup> that includes main town centre uses. <sup>8</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			

<sup>7</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>8</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<b>Site Name:</b>	<b>Bishopsgate Goods Yard</b>			
<b>Site Area (ha):</b>	<b>4.24</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.	-/?		areas, strategic and local views and a minor positive effect is identified on this basis.  The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++	++	Includes strategic scale open space provision.
	+ Site includes open space provision but only sufficient to meet the needs of the development.			
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			
	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			

<b>Site Name:</b>	<b>Bishopsgate Goods Yard</b>			
<b>Site Area (ha):</b>	<b>4.24</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Within 68m of Spitalfields City Farm and Allen Gardens SINC.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	The Design Principles for the site include the need to improve biodiversity and ecology within open space and green infrastructure and the potential for a minor positive benefit is identified on this basis.
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1	++	++	Within FZ1.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	--Site is partially or wholly within flood zone 3 a or 3b			

<b>Site Name:</b>	<b>Bishopsgate Goods Yard</b>			
<b>Site Area (ha):</b>	<b>4.24</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).			Whilst the site does not include brownfield land it is identified as containing vacant land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	+	+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>		<b>Bow Common Gas Works</b>		
<b>Site Area (ha):</b>		<b>3.94</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score Reg 18</b>	<b>Score Reg 19</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.	+	+	
	0 Site is within 50% least deprived LSOAs in the Borough			
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities proposed that impact on this objective. .
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.

<b>Site Name:</b>		<b>Bow Common Gas Works</b>		
<b>Site Area (ha):</b>		<b>3.94</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score Reg 18</b>	<b>Score Reg 19</b>	<b>Commentary / Mitigation</b>
population and reduce health inequalities.	+ Site safeguards an existing health facility.			Assessed on the basis that has potential for fewer than 500 dwellings.
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			Assessed on the basis that has potential for fewer than 500 dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	+	+	
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b			PTAL 2.
	+ Site lies within PTAL 3 or 4			
	0 – not used			
	- Site lies within PTAL 2	-	-	
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

<b>Site Name:</b>		<b>Bow Common Gas Works</b>			
<b>Site Area (ha):</b>		<b>3.94</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Score Reg 18</b>	<b>Score Reg 19</b>	<b>Commentary / Mitigation</b>
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.		++	++	New Secondary School proposed.
	+ Site safeguards/expands an existing school on site.				
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.				
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away				
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.				
	? Impacts on education facilities are uncertain.				
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.				The Local Plan identifies the need to re-provide existing employment on site.
	+ Site includes provision for employment related development.		+	+	
	0 Housing led scheme on land not in existing employment use.				
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).				
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).				
	? Impact on existing employment is uncertain.				
<b>8. Economic Growth:</b> Create and sustain local economic growth	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).		++	++	The site is within the City Fringe. Proposed residential development would replace onsite warehousing but the

<b>Site Name:</b>	<b>Bow Common Gas Works</b>			
<b>Site Area (ha):</b>	<b>3.94</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score Reg 18</b>	<b>Score Reg 19</b>	<b>Commentary / Mitigation</b>
across a range of sectors and business sizes.	+ Site would provide employment in a Local Employment Location (LEL).			Local Plan identifies the need to re-provide employment on site.
	0 Site does not provide employment and does not impact on existing employment areas.			
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
9. <b>Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Site outside of a town centre and other criteria do not apply (residential proposal which is not likely to include main town centre uses).
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.			
	0 Site outside of a town centre and other criteria do not apply.	0	0	
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>9</sup> that includes main town centre uses. <sup>10</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			
	++ Potential for a Listed Building to be brought back into beneficial use.			
10. <b>Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	+ Potential for a locally listed building to be brought back into use.	+/?	+	Locally Listed building within the site and the Local Plan highlights the need to protect/enhance this.
	0 Used if none of the other criteria apply.			The Design Principles identify the need to protect or enhance heritage assets on site and in the surrounding

<sup>9</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>10</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<b>Site Name:</b>		<b>Bow Common Gas Works</b>		
<b>Site Area (ha):</b>		<b>3.94</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score Reg 18</b>	<b>Score Reg 19</b>	<b>Commentary / Mitigation</b>
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			areas, including within the Tower Hamlets Cemetery Conservation Area.
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.			The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
	? Score uncertain if site is within 400m of a Conservation area or designated site.			
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++	++	Includes strategic scale open space provision.
	+ Site includes open space provision but only sufficient to meet the needs of the development.			
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			
	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			

<b>Site Name:</b>	<b>Bow Common Gas Works</b>			
<b>Site Area (ha):</b>	<b>3.94</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score Reg 18</b>	<b>Score Reg 19</b>	<b>Commentary / Mitigation</b>
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Within 20m of Tower Hamlets Cemetery Park and Ackroyd Drive LRN, within 15m of Mile End Park, Old railway at Fairfoot Road and Tower Hamlets Cemetery Park and The Soanes Centre SINC and the potential for a minor negative effect has been identified on this basis.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	The Development Principles for the site include the need to improve biodiversity and ecology within open space and green infrastructure.
	0 if criteria identified for other scores do not apply.			Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1	++	++	Within FZ1.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations include the provision that Development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test.
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	--Site is partially or wholly within flood zone 3 a or 3b			

<b>Site Name:</b>		<b>Bow Common Gas Works</b>		
<b>Site Area (ha):</b>		<b>3.94</b>		
Sustainability Objective	Basis for appraising sites	Score Reg 18	Score Reg 19	Commentary / Mitigation
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more). + Site involves the re-use of previously developed land and buildings (less than 5ha). 0 – Site safeguarded for existing use. - Site involves the loss of previously undeveloped land (less than 5ha). -- Site involves the loss of previously undeveloped land (5ha or more).		+ +	The site includes brownfield land and a historic landfill site. It also includes an active gas holder and warehousing which new residential development would replace. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.

<b>Site Name:</b>	<b>Chrissp Street Town Centre</b>			
<b>Site Area (ha):</b>	<b>3.62</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	+ + Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.	++	++	Re-provision of Idea Store and Local Market required.
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough			
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	+ + Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			Re-provision of Idea Store and Local Market required.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.	+	+	
	0 Housing or employment with no new facilities provided.			
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			

<b>Site Name:</b>	<b>Chrissp Street Town Centre</b>			
<b>Site Area (ha):</b>	<b>3.62</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.
	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
<b>4. Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	Assessed on the basis that has potential for 500+ dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
<b>5. Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b	++	++	Across PTAL 3-5.  The design considerations in the Regulation 19 Local Plan include a range of measures to improve connectivity including Improved walking and cycling connections to, from within the site, specifically to All Saints DLR Station.
	+ Site lies within PTAL 3 or 4			
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			

<b>Site Name:</b>	<b>Chrissp Street Town Centre</b>			
<b>Site Area (ha):</b>	<b>3.62</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.			No new schools proposed. Closest Primary School is Susan Lawrence Junior School 74m away and closest secondary school is Langdon Park Community School 218m away.
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.	0	0	
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	+ Site includes provision for employment related development.	+	+	Employment uses proposed as part of district town centre regeneration alongside residential units. The proposed site allocation requires a market to be re-provided and a range of (retail) unit sizes to be provided.
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			

Site Name:	Chrissp Street Town Centre			
Site Area (ha):	3.62			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>8. Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			Seeks to regenerate district town centre, and includes employment use, albeit the site is not within a designated employment location.
	+ Site would provide employment in a Local Employment Location (LEL).			
	0 Site does not provide employment and does not impact on existing employment areas.	0	0	
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
<b>9. Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			The site lies partly within the Chrissp Street district centre. Included main town centre uses however the site area is less than 5ha.
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.	+	+	
	0 Site outside of a town centre and other criteria do not apply.			
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>11</sup> that includes main town centre uses. <sup>12</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			
	++ Potential for a Listed Building to be brought back into beneficial use.			
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural	+ Potential for a locally listed building to be brought back into use.		+	The site lies within Lansbury Conservation Area but does not contain any listed buildings. A minor negative effect was identified at the Regulation 18 stage.

<sup>11</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>12</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Chrisp Street Town Centre			
Site Area (ha):	3.62			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
assets; distinctive character and an attractive built environment.	<p>0 Used if none of the other criteria apply.</p> <p>- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view</p> <p>-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.</p> <p>? Score uncertain if site is within 400m of a Conservation area or designated site.</p>			<p>The Design Principles in the Regulation 19 Local Plan include •the need to protect or enhance heritage assets on site and in the surrounding areas, including the Lansbury Estate and Conservation Area to the west and Poplar Baths to the south. A minor positive effect is identified on this basis.</p> <p>The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.</p>
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.</p> <p>+ Site includes open space provision but only sufficient to meet the needs of the development.</p> <p>0 Site or associated use does not generate a need for open space.</p> <p>- Development would result in the loss of open space but partial compensatory land is provided elsewhere.</p> <p>-- Development would result in the loss of open space and compensatory land is not provided elsewhere.</p> <p>? Impact on open space provision is uncertain.</p>		 	<p>Does not include strategic open space provision. However as the proposal includes residential development it is assumed that open space to meet onsite needs would be provided in accordance with relevant planning policies. The Design Principles for the site in the Regulation 19 Local Plan also include the need to integrate the site with the Green Grid route.</p>
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p>++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.</p> <p>+ Not used – see above.</p> <p>0 Score all sites as neutral.</p> <p>- Not used – see above.</p>	0	0	

<b>Site Name:</b>	<b>Chrissp Street Town Centre</b>			
<b>Site Area (ha):</b>	<b>3.62</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	-- Not used – see above.			No relevant designations within threshold distances.
	? Not used – see above.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			No relevant designations within threshold distances.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 if criteria identified for other scores do not apply.	0	0	
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.			
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			The delivery considerations include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1			Within FZ2.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1	-	-	

<b>Site Name:</b>	<b>Chrisp Street Town Centre</b>			
<b>Site Area (ha):</b>	<b>3.62</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Reg 18 Score</b>	<b>Reg 19 Score</b>
	--Site is partially or wholly within flood zone 3 a or 3b			potential for a minor negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).			Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).		+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Crossharbour Town Centre</b>			
<b>Site Area (ha):</b>	<b>4.89</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.		++	Appraised on the basis that it was being considered for an Idea Store at Regulation 18 Stage. The Regulation 19 Local Plan includes the need for a local presence facility alongside redevelopment of the district centre and a significant positive effect is identified on this basis.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.	+		
	0 Housing or employment with no new facilities provided.			
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the	++ Site includes provision of a new health facility that will serve the wider community.	++	++	Health facility proposed (re-provision and expansion).

<b>Site Name:</b>	<b>Crossharbour Town Centre</b>			
<b>Site Area (ha):</b>	<b>4.89</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
population and reduce health inequalities.	+ Site safeguards an existing health facility.			Assessed on the basis that has potential for 500+ dwellings.
	0 No new health facilities proposed on site			
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	Assessed on the basis that has potential for 500+ dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b	++	++	Across PTAL 1b-5.
	+ Site lies within PTAL 3 or 4			
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

Site Name:	Crossharbour Town Centre			
Site Area (ha):	4.89			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.	++	++	New Primary School proposed.
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			The proposed site allocation includes for comprehensive redevelopment of the district centre providing retail floorspace and other commercial uses, including SME.
	+ Site includes provision for employment related development.	+	+	
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			

Site Name:	Crossharbour Town Centre			
Site Area (ha):	4.89			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
across a range of sectors and business sizes.	+ Site would provide employment in a Local Employment Location (LEL).			Site lies partly within the Crossharbour district centre. Proposed health facility is a main town centre use and the proposed retail/commercial uses are also likely to be main town centre uses, including a replacement supermarket.
	0 Site does not provide employment and does not impact on existing employment areas.	0	0	
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
9. <b>Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Site lies partly within the Crossharbour district centre. Proposed health facility is a main town centre use and the proposed retail/commercial uses are also likely to be main town centre uses, including a replacement supermarket.
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.	+	+	
	0 Site outside of a town centre and other criteria do not apply.			
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>13</sup> that includes main town centre uses. <sup>14</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			
	++ Potential for a Listed Building to be brought back into beneficial use.			
10. <b>Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	+ Potential for a locally listed building to be brought back into use.		+	No identified designated heritage assets within the site however the Design Principles in the Regulation 19 Local Plan identify the need to protect or enhance the setting of the Maritime Greenwich World Heritage
	0 Used if none of the other criteria apply.	0		

<sup>13</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>14</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<b>Site Name:</b>	<b>Crossharbour Town Centre</b>			
<b>Site Area (ha):</b>	<b>4.89</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	<ul style="list-style-type: none"> <li>- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area)</li> <li>Or</li> <li>Site is within a valued local view</li> </ul>			<p>Site and other surrounding heritage assets. A minor positive effect is identified at Regulation 19 stage on this basis.</p>
	<ul style="list-style-type: none"> <li>-- site includes a heritage feature of national importance</li> <li>Or</li> <li>Site potentially impacts on a WHO or its buffer zone.</li> </ul>			<p>The Local Plan identifies the need to protect or enhance the setting of the Maritime Greenwich World Heritage Site and other surrounding heritage assets.</p>
	<ul style="list-style-type: none"> <li>? Score uncertain if site is within 400m of a Conservation area or designated site.</li> </ul>			<p>The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall Buildings' and Policy D.DH7 'Density'.</p>
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.			Does not include strategic open space provision. However as the proposal includes residential development it was assumed at Regulation 18 stage that open space to meet onsite needs would be provided in accordance with relevant planning policies so a minor positive effect, with some uncertainty was indicated.
	+ Site includes open space provision but only sufficient to meet the needs of the development.	+/-	+	Note that the Regulation 19 Development Principles are not explicit on the need for open space at this location however the concept plan for the site indicates publicly accessible open space on the western portion of the site and a minor positive effect has been identified on this basis.
	0 Site or associated use does not generate a need for open space.			Mudchute Park and Farm lies to the south of the site.
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			

<b>Site Name:</b>	<b>Crossharbour Town Centre</b>			
<b>Site Area (ha):</b>	<b>4.89</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			Adjacent to Mudchute Park Farm LNR and Mudchute Park and Farm SINC, within 25m of Millwall and West India Docks SINC.  Potential for a negative effect on biodiversity. The Design Principles for the in the Regulation 19 Local Plan include the need to improve biodiversity and ecology and a minor positive effect is identified on this basis.  Other polices in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Adjacent to Mudchute Park Farm LNR and Mudchute Park and Farm SINC, within 25m of Millwall and West India Docks SINC.  Potential for a negative effect on biodiversity. The Design Principles for the in the Regulation 19 Local Plan include the need to improve biodiversity and ecology and a minor positive effect is identified on this basis.  Other polices in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	

<b>Site Name:</b>	<b>Crossharbour Town Centre</b>			
<b>Site Area (ha):</b>	<b>4.89</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Reg 18 Score</b>	<b>Reg 19 Score</b>
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site is wholly within flood zone 1			Within FZ3a.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
	++ Site involves the re-use of previously developed land and buildings (5ha or more).			Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. As the site is less than 5ha a minor positive effect is identified.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	+	+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Leven Road Gas Works</b>			
<b>Site Area (ha):</b>	<b>8.56</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Reg 18 Scor e</b>	<b>Reg 19 Scor e</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	+ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.	++	++	
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough			
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	+ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities that are relevant to this objective.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			

<b>Site Name:</b>	<b>Leven Road Gas Works</b>			
<b>Site Area (ha):</b>	<b>8.56</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Reg 18 Score</b>	<b>Reg 19 Score</b>
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.
	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
<b>4. Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	Assessed on the basis that has potential for 500+ dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
	++ Site lies within PTAL 5 or 6a/b			
<b>5. Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	+ Site lies within PTAL 3 or 4			2017 data indicates site is within PTAL 0-2 so a minor negative effect is identified on that basis at Regulation 19 stage. The Regulation 18 score reflects older data.  The Design Principles in the Regulation 19 Local Plan include the need to improve walking and cycling
	0 – not used			
	- Site lies within PTAL 2		-	

<b>Site Name:</b>	<b>Leven Road Gas Works</b>			
<b>Site Area (ha):</b>	<b>8.56</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Reg 18 Score</b>	<b>Reg 19 Score</b>
	-- Site lies within PTAL 1a or b	--		
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			connections to, from within the site, specifically to link with the River Lea Park walk, Aberfeldy neighbourhood centre, to Langdon Park DLR station and East India DLR station.
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.	++	++	New Secondary School proposed.
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			Regulation 19 Local Plan requires re-provision of existing employment and a minor positive effect is identified on that basis.
	+ Site includes provision for employment related development.		+	
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			

<b>Site Name:</b>	<b>Leven Road Gas Works</b>			
<b>Site Area (ha):</b>	<b>8.56</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Scor e</b>	<b>Reg 19 Scor e</b>	<b>Commentary / Mitigation</b>
	? Impact on existing employment is uncertain.	?		
<b>8. Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			The site allocation includes an allowance for employment but does not impact on existing employment areas.
	+ Site would provide employment in a Local Employment Location (LEL).			
	0 Site does not provide employment and does not impact on existing employment areas.	0	0	
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
<b>9. Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Site outside of a town centre and other criteria do not apply (residential proposal which is not likely to include main town centre uses).
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.			
	0 Site outside of a town centre and other criteria do not apply.	0	0	
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>15</sup> that includes main town centre uses. <sup>16</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			

<sup>15</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>16</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<b>Site Name:</b>	<b>Leven Road Gas Works</b>			
<b>Site Area (ha):</b>	<b>8.56</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	? Uncertain if site will include town centre uses.			
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Potential for a Listed Building to be brought back into beneficial use.			The site lies within an Archaeological Priority Area and a minor negative effect was identified at Regulation 18 stage in light of this.
	+ Potential for a locally listed building to be brought back into use.			
	0 Used if none of the other criteria apply.			
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view	-	+/-	The design considerations in the Regulation 19 Local Plan include the need to retain and integrate the characteristic gasholders in the provision of green open space and a mixed positive and negative score is identified on that basis, i.e. there could still be an impact on the Archaeological Priority Area but benefits associated with retention of the gasholders.
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.			
	? Score uncertain if site is within 400m of a Conservation area or designated site.			The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++	++	Includes strategic scale open space provision.
	+ Site includes open space provision but only sufficient to meet the needs of the development.			
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			

<b>Site Name:</b>	<b>Leven Road Gas Works</b>			
<b>Site Area (ha):</b>	<b>8.56</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Scor e</b>	<b>Reg 19 Scor e</b>	<b>Commentary / Mitigation</b>
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			
	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Adjacent to The River Thames and tidal tributaries SINC. A minor negative effect was identified at the Regulation 18 stage on this basis.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	The Design Principles for the site in the Regulation 19 Local Plan identify the need to improve biodiversity along water edges and within open spaces. The Development Principles for the sub-area also identify the opportunity to bring green spaces and wetland areas into the built environment. The River Lea forms the northern boundary to the site and a minor positive has been identified on this basis.
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.

<b>Site Name:</b>	<b>Leven Road Gas Works</b>			
<b>Site Area (ha):</b>	<b>8.56</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Reg 18 Score</b>	<b>Reg 19 Score</b>
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1			Within FZ3a.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).	++	++	The site includes brownfield land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).			
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			



<b>Site Name:</b>	<b>Limeharbour</b>			
<b>Site Area (ha):</b>	<b>4.87</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities proposed except a primary school and open space.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.

Site Name:	Limeharbour			
Site Area (ha):	4.87			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
population and reduce health inequalities.	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	Assessed on the basis that has potential for 500+ dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b			Across PTAL 3-4.
	+ Site lies within PTAL 3 or 4	+	+	
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

<b>Site Name:</b>	Limeharbour			
<b>Site Area (ha):</b>	4.87			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.	++	++	New Primary School proposed.
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			The Regulation 19 Local Plan includes an allowance for compatible commercial uses, including SME.
	+ Site includes provision for employment related development.		+	
	0 Housing led scheme on land not in existing employment use.	0		
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			

Site Name:	Limeharbour			
Site Area (ha):	4.87			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
across a range of sectors and business sizes.	+ Site would provide employment in a Local Employment Location (LEL). 0 Site does not provide employment and does not impact on existing employment areas. - Development would result in the loss of employment in a LEL -- Development would result in the loss of employment in the City Fringe, a SIL or POL. ? Impact on SIL, POL and LEL is uncertain.			
9. Town Centres: Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF). + Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study. 0 Site outside of a town centre and other criteria do not apply. - Site of less than 5ha outside of either a town centre or edge of centre <sup>17</sup> that includes main town centre uses. <sup>18</sup> -- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses ? Uncertain if site will include town centre uses.			Site is within the Tower Hamlets Activity Area but not allocated for town centre uses.
10. Design and Heritage: Enhance and conserve heritage and cultural	++ Potential for a Listed Building to be brought back into beneficial use. + Potential for a locally listed building to be brought back into use.		+	No designated heritage assets were identified at the Regulation 18 stage however the Design Principles for the site in the Regulation 19 Local Plan identifies the

<sup>17</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>18</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Limeharbour			
Site Area (ha):	4.87			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
assets; distinctive character and an attractive built environment.	<p>0 Used if none of the other criteria apply.</p> <p>- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view</p> <p>-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.</p> <p>? Score uncertain if site is within 400m of a Conservation area or designated site.</p>	0		<p>need to protect or enhance the setting of heritage assets in and around the area, including the historic docks and the setting of the Maritime Greenwich World Heritage Site to the south. A minor positive effect is identified on this basis.</p> <p>The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.</p>
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.</p> <p>+ Site includes open space provision but only sufficient to meet the needs of the development.</p> <p>0 Site or associated use does not generate a need for open space.</p> <p>- Development would result in the loss of open space but partial compensatory land is provided elsewhere.</p> <p>-- Development would result in the loss of open space and compensatory land is not provided elsewhere.</p> <p>? Impact on open space provision is uncertain.</p>	++	++	Includes strategic scale open space provision.
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p>++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.</p> <p>+ Not used – see above.</p> <p>0 Score all sites as neutral.</p>	0	0	

<b>Site Name:</b>	<b>Limeharbour</b>			
<b>Site Area (ha):</b>	<b>4.87</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Adjacent to Millwall and West India Docks SINC. The potential for a minor negative effect was identified on this basis.  The Design Principles for the site include the need to improve biodiversity and nature conservation along the water edges and within open spaces and a minor positive effect has been identified on this basis.  Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
	++ Site is wholly within flood zone 1			Within FZ3a.

<b>Site Name:</b>	<b>Limeharbour</b>			
<b>Site Area (ha):</b>	<b>4.87</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).			The site contains brownfield land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. Site is under 5ha and Reg 18 score corrected to reflect that.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	+	+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>		<b>Marian Place Gas Works and The Oval</b>			
<b>Site Area (ha):</b>		<b>3.75</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score</b>		<b>Commentary / Mitigation</b>	
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			(The site is only marginally within the 10 -50% most deprived LSOAs in the Borough)	
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.	+	+		
	0 Site is within 50% least deprived LSOAs in the Borough				
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)				
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)				
	? Effects on deprived LSOAs uncertain.				
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			The land-use requirements for the site include other compatible community and social uses and a minor positive effect is identified on this basis.	
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.		+		
	0 Housing or employment with no new facilities provided.	0			
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)				
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)				
	? Uncertain if facilities will be provided.				

<b>Site Name:</b>		<b>Marian Place Gas Works and The Oval</b>		
<b>Site Area (ha):</b>		<b>3.75</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score</b>		<b>Commentary / Mitigation</b>
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.
	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
<b>4. Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			Assessed on the basis that has potential for fewer than 500 dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	+	+	
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
<b>5. Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		++	2017 data indicates site is within PTAL 4-6a and a significant positive effect is identified on this basis. The Regulation 18 score reflects older data.
	+ Site lies within PTAL 3 or 4	+		
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			

<b>Site Name:</b>		<b>Marian Place Gas Works and The Oval</b>		
<b>Site Area (ha):</b>		<b>3.75</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score</b>		<b>Commentary / Mitigation</b>
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.			<p>An early iteration of the Local Plan included a requirement for a Primary School, although this was not carried through to the Regulation 18 Local Plan the site was scored on the basis of a school being provided on site so the Regulation 18 score has been amended on that basis.</p> <p>Mowlem Primary School is approximately 0.2km away and Oaklands Secondary School is 0.6km away.</p>
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.	0	0	
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			<p>The Regulation 19 Local Plan indicates that employment is proposed on the site, including SME start-ups and creative and tech industries and a minor positive effect is identified on that basis.</p>
	+ Site includes provision for employment related development.		+	
	0 Housing led scheme on land not in existing employment use.	0		
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			

<b>Site Name:</b>		<b>Marian Place Gas Works and The Oval</b>		
<b>Site Area (ha):</b>		<b>3.75</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Score</b>	<b>Commentary / Mitigation</b>
<b>8. Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			The site allocation includes employment but does not impact on existing employment areas.
	+ Site would provide employment in a Local Employment Location (LEL).			
	0 Site does not provide employment and does not impact on existing employment areas.	0	0	
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
<b>9. Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Site outside of a town centre, but adjacent to Cambridge Heath Neighbourhood Centre. Residential proposal which is not likely to include main town centre uses.
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.			
	0 Site outside of a town centre and other criteria do not apply.	0	0	
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>19</sup> that includes main town centre uses. <sup>20</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural	++ Potential for a Listed Building to be brought back into beneficial use.			The site contains Statutory Listed Building LB869 (Grade II) and is mostly within the Hackney Road & Regents

<sup>19</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>20</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<b>Site Name:</b>		<b>Marian Place Gas Works and The Oval</b>		
<b>Site Area (ha):</b>		<b>3.75</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Score</b>	<b>Commentary / Mitigation</b>
assets; distinctive character and an attractive built environment.	+ Potential for a locally listed building to be brought back into use.		+	Canal Conservation Area. It also includes part of view 8A.1 of the London View Management Framework. The potential for a significant negative effect was identified at Regulation 18 stage because of the presence of the Listed Buildings and Conservation Area.
	0 Used if none of the other criteria apply.			
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			The Design Principles for the site in the Regulation 19 Local Plan identify the need to respect and respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, specifically integrate heritage assets on site and in the surrounding areas.
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.		-/-?	
	? Score uncertain if site is within 400m of a Conservation area or designated site.			The need to retain and enhance the existing gasholders for their local character and landmark merit is also identified. A minor positive effect is identified on this basis.
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++	++	The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
	+ Site includes open space provision but only sufficient to meet the needs of the development.			
	0 Site or associated use does not generate a need for open space.			Includes strategic scale open space provision.

<b>Site Name:</b>		<b>Marian Place Gas Works and The Oval</b>		
<b>Site Area (ha):</b>		<b>3.75</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score</b>		<b>Commentary / Mitigation</b>
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere. -- Development would result in the loss of open space and compensatory land is not provided elsewhere. ? Impact on open space provision is uncertain.			
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting. + Not used – see above. 0 Score all sites as neutral. - Not used – see above. -- Not used – see above. ? Not used – see above.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment). + Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment). 0 if criteria identified for other scores do not apply. - Site is within 100m of a locally designated site Or Protected species likely to be on site. -- Site is within 500m of a nationally/internationally designated site. ? Impact on biodiversity is uncertain		+	Adjacent to London's Canals SINC. Potential for a negative effect on biodiversity identified at both Regulation 18 and 19 stage.  Design Principles for the site in the Regulation 19 Local Plan include the need to improve biodiversity and ecology within open spaces and green infrastructure and a minor positive effect is identified.  Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment). + Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			

<b>Site Name:</b>		<b>Marian Place Gas Works and The Oval</b>		
<b>Site Area (ha):</b>		<b>3.75</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Score</b>	<b>Commentary / Mitigation</b>
	0 No effect.		0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		++	Within FZ1
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b			
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).			The site includes brownfield land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. The proposed site allocation notes that any development proposal would need to address any environmental pollution and land contamination caused by the existing gas works.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).		+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Marsh Wall East</b>			
<b>Site Area (ha):</b>	<b>3.42</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	+ + Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	+ + Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities proposed that are relevant to this objective. A Primary School, Health Facility and small Open space are proposed and considered elsewhere in this appraisal.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the	+ + Site includes provision of a new health facility that will serve the wider community.	++	++	Health facility proposed.

Site Name:	Marsh Wall East			
Site Area (ha):	3.42			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
population and reduce health inequalities.	+ Site safeguards an existing health facility.			Assessed on the basis that has potential for fewer than 500 dwellings.
	0 No new health facilities proposed on site			
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			Assessed on the basis that has potential for fewer than 500 dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	+	+	
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
	++ Site lies within PTAL 5 or 6a/b			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	+ Site lies within PTAL 3 or 4	+	+	Across PTAL 3-4
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

<b>Site Name:</b>	<b>Marsh Wall East</b>			
<b>Site Area (ha):</b>	<b>3.42</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.	++	++	New Primary School proposed
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			The Regulation 19 Local Plan includes an allowance for employment: including provision for SMEs.
	+ Site includes provision for employment related development.		+	
	0 Housing led scheme on land not in existing employment use.	0		
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			

Site Name:	Marsh Wall East			
Site Area (ha):	3.42			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
across a range of sectors and business sizes.	+ Site would provide employment in a Local Employment Location (LEL). 0 Site does not provide employment and does not impact on existing employment areas. - Development would result in the loss of employment in a LEL -- Development would result in the loss of employment in the City Fringe, a SIL or POL. ? Impact on SIL, POL and LEL is uncertain.			
9. Town Centres: Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF). + Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study. 0 Site outside of a town centre and other criteria do not apply. - Site of less than 5ha outside of either a town centre or edge of centre <sup>21</sup> that includes main town centre uses. <sup>22</sup> -- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses ? Uncertain if site will include town centre uses.			Site falls within the Tower Hamlets Activity Area but not allocated for retail use.
10. Design and Heritage: Enhance and conserve heritage and cultural	++ Potential for a Listed Building to be brought back into beneficial use. + Potential for a locally listed building to be brought back into use.		+	The site borders the Coldharbour Conservation Area to the east and an uncertain effect is identified at Regulation 18 stage on this basis.

<sup>21</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>22</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Marsh Wall East			
Site Area (ha):	3.42			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
assets; distinctive character and an attractive built environment.	<p>0 Used if none of the other criteria apply.</p> <p>- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view</p> <p>-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.</p> <p>? Score uncertain if site is within 400m of a Conservation area or designated site.</p>			<p>The Design Principles in the Regulation 19 Local Plan identify the need to protect or enhance the setting of heritage assets in and around the area, including the historic docks and the setting of the Maritime Greenwich World Heritage Site to the south. A minor positive effect is identified on that basis.</p> <p>The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH7 'Shaping and Managing Views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall Buildings' and Policy D.DH7 'Density'..</p>
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.</p> <p>+ Site includes open space provision but only sufficient to meet the needs of the development.</p> <p>0 Site or associated use does not generate a need for open space.</p> <p>- Development would result in the loss of open space but partial compensatory land is provided elsewhere.</p> <p>-- Development would result in the loss of open space and compensatory land is not provided elsewhere.</p> <p>? Impact on open space provision is uncertain.</p>	++	+	<p>The Regulation 18 Local Plan appraisal assumed there would be strategic open space at this site. The Regulation 19 Local Plan confirms that a small site (0.4ha) will be provided and a minor positive effect is identified on that basis.</p>

Site Name:	Marsh Wall East			
Site Area (ha):	3.42			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			Adjacent to Millwall and West India Docks SINC and a minor negative effect was identified at Regulation 18 stage on this basis.  The Design Principles for the site in the Regulation 19 Local Plan identify the need to improve biodiversity and nature conservation along the water edges and within open spaces and a minor positive effect is identified on this basis.  Other polices in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Adjacent to Millwall and West India Docks SINC and a minor negative effect was identified at Regulation 18 stage on this basis.  The Design Principles for the site in the Regulation 19 Local Plan identify the need to improve biodiversity and nature conservation along the water edges and within open spaces and a minor positive effect is identified on this basis.  Other polices in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	

Site Name:	Marsh Wall East			
Site Area (ha):	3.42			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			Within FZ2-3a.  Delivery considerations include the requirement that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site is wholly within flood zone 1			The site includes brownfield land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
	++ Site involves the re-use of previously developed land and buildings (5ha or more).			
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	+	+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>		<b>Marsh Wall West</b>		
<b>Site Area (ha):</b>		<b>6.39</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Reg 18 Score</b>	<b>Reg 19 Score</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities proposed that relate to this objective. Primary school, health facility and open space considered elsewhere in this appraisal.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			

<b>Site Name:</b>		<b>Marsh Wall West</b>		
<b>Site Area (ha):</b>		<b>6.39</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Reg 18 Score</b>	<b>Reg 19 Score</b>
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.	++ Site includes provision of a new health facility that will serve the wider community.		++	++
	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site			
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
<b>4. Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).		++	++
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
<b>5. Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b			
	+ Site lies within PTAL 3 or 4		+	+
	0 – not used			
	- Site lies within PTAL 2			

<b>Site Name:</b>		<b>Marsh Wall West</b>		
<b>Site Area (ha):</b>		<b>6.39</b>		
Sustainability Objective	<b>Basis for appraising sites</b>		<b>Reg 18 Score</b>	<b>Reg 19 Score</b>
		-- Site lies within PTAL 1a or b		
? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.				
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.		++	++
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			
	+ Site includes provision for employment related development.		+	+
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			

<b>Site Name:</b>		<b>Marsh Wall West</b>		
<b>Site Area (ha):</b>		<b>6.39</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	? Impact on existing employment is uncertain.			
<b>8. Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			The site allocation includes employment but does not impact on existing employment areas.
	+ Site would provide employment in a Local Employment Location (LEL).			
	0 Site does not provide employment and does not impact on existing employment areas.	0	0	
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
<b>9. Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).	++	++	Site is within the Tower Hamlets Activity Area and existing consent includes a retail element.
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.			
	0 Site outside of a town centre and other criteria do not apply.			
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>23</sup> that includes main town centre uses. <sup>24</sup>			

<sup>23</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>24</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<b>Site Name:</b>		<b>Marsh Wall West</b>		
<b>Site Area (ha):</b>		<b>6.39</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Potential for a Listed Building to be brought back into beneficial use.			No designated heritage assets identified at Regulation 18 stage.
	+ Potential for a locally listed building to be brought back into use.		+	The Design Principles for the site in the Regulation 19 Local Plan identify the need to protect and enhance the setting of the Maritime Greenwich World Heritage Site and other surrounding heritage assets including the historic dockside promenade and a minor positive effect is identified on that basis.
	0 Used if none of the other criteria apply.	0		
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.			
	? Score uncertain if site is within 400m of a Conservation area or designated site.			The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++		Regulation 18 Local Plan appraisal assumed there would be strategic open space at this site. The Regulation 19 Local Plan confirms that a small site (0.4ha) will be provided and a minor positive effect is identified on that basis.
	+ Site includes open space provision but only sufficient to meet the needs of the development.		+	
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			

<b>Site Name:</b>		<b>Marsh Wall West</b>		
<b>Site Area (ha):</b>		<b>6.39</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.  + Not used – see above.  0 Score all sites as neutral.  - Not used – see above.  -- Not used – see above.  ? Not used – see above.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).  + Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).  0 if criteria identified for other scores do not apply.  - Site is within 100m of a locally designated site Or Protected species likely to be on site.  -- Site is within 500m of a nationally/internationally designated site.  ? Impact on biodiversity is uncertain		+	Adjacent to Millwall and West India Docks SINC.  Potential for a negative effect on biodiversity identified at Regulation 18 stage. The Design Principles for the site in the Regulation 19 Local Plan identify the need to improve biodiversity.  Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).  + Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			

<b>Site Name:</b>		<b>Marsh Wall West</b>		
<b>Site Area (ha):</b>		<b>6.39</b>		
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
	0 No effect.	0		
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1			Within FZ3a  Delivery considerations require that Development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).	++	++	The site includes brownfield land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).			
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			



<b>Site Name:</b>	<b>Millharbour</b>			
<b>Site Area (ha):</b>	<b>3.58</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Score</b>		<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.	+	+	
	0 Site is within 50% least deprived LSOAs in the Borough			
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities proposed that are relevant to this objective A primary school, health facility and open space are proposed and are considered under elsewhere in this appraisal.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
<b>3. Health and wellbeing:</b> Improve the health and wellbeing of the	++ Site includes provision of a new health facility that will serve the wider community.	++	++	Health facility proposed

Site Name:	Millharbour			
Site Area (ha):	3.58			
Sustainability Objective	Basis for appraising sites	Score		Commentary / Mitigation
population and reduce health inequalities.	+ Site safeguards an existing health facility.			Assessed on the basis that has potential for fewer than 500 dwellings.
	0 No new health facilities proposed on site			
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			Assessed on the basis that has potential for fewer than 500 dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	+	+	
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b			Across PTAL 2-3.
	+ Site lies within PTAL 3 or 4		+/	
	0 – not used		+/	
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

Site Name:	Millharbour			
Site Area (ha):	3.58			
Sustainability Objective	Basis for appraising sites	Score		Commentary / Mitigation
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.	++	++	New Primary School proposed
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			Local Plan makes an allowance for employment uses and planning permissions PA/14/3195 and PA/14/01246 include office and retail space.
	+ Site includes provision for employment related development.	+	+	
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
8. Economic Growth: Create and sustain local economic growth	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			The site includes an allowance for employment but is not within a SIL, POL or LEL.

Site Name:	Millharbour		
Site Area (ha):	3.58		
Sustainability Objective	Basis for appraising sites	Score	Commentary / Mitigation
across a range of sectors and business sizes.	+ Site would provide employment in a Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	0	0
	- Development would result in the loss of employment in a LEL		
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.		
	? Impact on SIL, POL and LEL is uncertain.		
9. Town Centres: Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).	++	++
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.		
	0 Site outside of a town centre and other criteria do not apply.		
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>25</sup> that includes main town centre uses. <sup>26</sup>		
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses		
	? Uncertain if site will include town centre uses.		
			Site falls within the Tower Hamlets Activity Area and existing consent includes provision for retail.
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Potential for a Listed Building to be brought back into beneficial use.		
	+ Potential for a locally listed building to be brought back into use.		+
	0 Used if none of the other criteria apply.	0	
			No designated heritage assets identified at Regulation 18 stage.

<sup>25</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>26</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Millharbour		
Site Area (ha):	3.58		
Sustainability Objective	Basis for appraising sites	Score	Commentary / Mitigation
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view		The Design Principles in the Regulation 19 Local Plan identify the need to protect and enhance the setting of the Maritime Greenwich World Heritage Site and other surrounding heritage assets including the historic dockside promenade.
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.		The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
	? Score uncertain if site is within 400m of a Conservation area or designated site.		
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.		Includes 0.4ha of open space provision.
	+ Site includes open space provision but only sufficient to meet the needs of the development.	+	+
	0 Site or associated use does not generate a need for open space.		
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.		
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.		
	? Impact on open space provision is uncertain.		
0 Score all sites as neutral.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.		
	+ Not used – see above.		
	0 Score all sites as neutral.	0	0

Site Name:	Millharbour		
Site Area (ha):	3.58		
Sustainability Objective	Basis for appraising sites	Score	Commentary / Mitigation
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	- Not used – see above.		Adjacent to Millwall and West India Docks SINC. Potential for a negative effect on biodiversity identified at Regulation 18 stage. The Design Principles for the in the Regulation 19 Local Plan identify the need to improve biodiversity.
	-- Not used – see above.		
	? Not used – see above.		
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		Other polices in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).	+	
	0 if criteria identified for other scores do not apply.		
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-	
	-- Site is within 500m of a nationally/internationally designated site.		
	? Impact on biodiversity is uncertain		
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		Within FZ2-3.  Development principles require that Development should accord with any flood mitigation and adaptation
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		
	0 No effect.	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).		
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).		
	? Impact is uncertain.		

<b>Site Name:</b>	<b>Millharbour</b>			
<b>Site Area (ha):</b>	<b>3.58</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>		<b>Score</b>	<b>Commentary / Mitigation</b>
	- Majority of site is within flood zone 2, with remainder in flood zone 1			measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test.
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).			The site includes brownfield land and is also identified as containing a vacant car sales office. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. The Regulation 18 appraisal was based on a larger site area and has been amended.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	+	+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Millharbour South</b>			
<b>Site Area (ha):</b>	<b>4.09</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities proposed except open space, Primary School and Health Facility.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			

Site Name:	Millharbour South			
Site Area (ha):	4.09			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
3. <b>Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.	++ Site includes provision of a new health facility that will serve the wider community.	++	++	Health facility proposed.
	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site			
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	Assessed on the basis that has potential for 500+ dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b			2017 data indicates that the site is within zones 2 to 3 and a minor positive effect is identified on that basis. The Regulation 18 score reflects older data.
	+ Site lies within PTAL 3 or 4		+	
	0 – not used			
	- Site lies within PTAL 2	-		
	-- Site lies within PTAL 1a or b			

Site Name:	Millharbour South			
Site Area (ha):	4.09			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.	++	++	Local Plan makes provision for a Primary School.
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			Local Plan includes allowance for employment provision. Planning permission PA/11/00798 includes ground floor office and retail space.
	+ Site includes provision for employment related development.	+	+	
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			

Site Name:	Millharbour South			
Site Area (ha):	4.09			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	? Impact on existing employment is uncertain.			
8. <b>Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			Site includes employment provision but is not within a SIL, POL or LEL.
	+ Site would provide employment in a Local Employment Location (LEL).			
	0 Site does not provide employment and does not impact on existing employment areas.	0	0	
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
9. <b>Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Site falls within the Tower Hamlets Activity Area. Employment uses including main town centre uses (retail) have been consented within a site area less than 5ha outwith a town centre or edge of centre location.
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.	+	+	
	0 Site outside of a town centre and other criteria do not apply.			
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>27</sup> that includes main town centre uses. <sup>28</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			

<sup>27</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>28</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Millharbour South			
Site Area (ha):	4.09			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	? Uncertain if site will include town centre uses.			
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Potential for a Listed Building to be brought back into beneficial use.			No designated heritage assets identified at the Regulation 18 stage.
	+ Potential for a locally listed building to be brought back into use.		+	The design considerations include the need to protect and enhance the setting of the Maritime Greenwich World Heritage Site and other surrounding heritage assets including the historic dockside promenade. A minor positive effect is identified on this basis.
	0 Used if none of the other criteria apply.	0		
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.			
	? Score uncertain if site is within 400m of a Conservation area or designated site.			The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++		Regulation 18 Local Plan appraisal assumed there would be strategic open space at this site. The Regulation 19 Local Plan confirms that a small site (0.4ha) will be provided and a minor positive effect is identified on that basis.
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	+ Site includes open space provision but only sufficient to meet the needs of the development.		+	The Local Plan notes that open space provision in this location has the potential to expand the permitted open space at Westferry Printworks. A significant positive cumulative effect.
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			

Site Name:	Millharbour South			
Site Area (ha):	4.09			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			Adjacent to Millwall and West India Docks SINC. Potential for a negative effect on biodiversity identified at Regulation 18 stage. The Design Principles for the site in the Regulation 19 Local Plan identify the need to improve biodiversity and ecology.  Other polices in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Adjacent to Millwall and West India Docks SINC. Potential for a negative effect on biodiversity identified at Regulation 18 stage. The Design Principles for the site in the Regulation 19 Local Plan identify the need to improve biodiversity and ecology.  Other polices in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			

Site Name:	Millharbour South			
Site Area (ha):	4.09			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1			Within FZ3a.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations require that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test.
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).			The site includes brownfield land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. The Regulation 18 appraisal was based on a larger site area and has been amended.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	+	+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

Site Name:	North Quay			
Site Area (ha):	3.27			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
1. <b>Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
2. <b>Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No community facilities proposed except open space.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
	++ Site includes provision of a new health facility that will serve the wider community.			
3. <b>Health and wellbeing:</b> Improve the health and wellbeing of the	No new health facilities proposed on site.			

Site Name:	North Quay			
Site Area (ha):	3.27			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
population and reduce health inequalities.	+ Site safeguards an existing health facility.			At the Regulation 18 stage it was assumed that the site would be developed wholly for employment. The Regulation 19 Local Plan indicates that up to 25% of the site could be used for housing and a positive effect is anticipated.
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			At the Regulation 18 stage it was assumed that the site would be developed wholly for employment. The Regulation 19 Local Plan indicates that up to 25% of the site could be used for housing and a positive effect is anticipated.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).		+	
	0 No housing provided e.g. employment led scheme.	0		
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		++	2017 data indicates the site is within PTAL 5-6a. A significant positive effect is identified on that basis. The Regulation 18 appraisal reflects older data.
	+ Site lies within PTAL 3 or 4	+		
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

Site Name:	North Quay			
Site Area (ha):	3.27			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.			Closest existing Primary School is Holy Family Catholic School, approximately 260m away and closest existing Secondary School is The Blessed John Roche Roman Catholic School, approximately 620m away.
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.	0	0	
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			Employment led development proposed at Regulation 18 stage. The Regulation 19 allocation also includes employment.
	+ Site includes provision for employment related development.	+	+	
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			

Site Name:	North Quay			
Site Area (ha):	3.27			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>8. Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).	++	++	Employment led development is proposed the site lies close to / within Canary Wharf Preferred Office Location.
	+ Site would provide employment in a Local Employment Location (LEL).			
	0 Site does not provide employment and does not impact on existing employment areas.			
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
<b>9. Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Employment uses, likely to include main town centre uses, are proposed on a site area less than 5ha entirely within Canary Wharf Major Centre.
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.	+	+	
	0 Site outside of a town centre and other criteria do not apply.			
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>29</sup> that includes main town centre uses. <sup>30</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			

<sup>29</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>30</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	North Quay			
Site Area (ha):	3.27			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Potential for a Listed Building to be brought back into beneficial use.			No identified designated heritage assets.
	+ Potential for a locally listed building to be brought back into use.			
	0 Used if none of the other criteria apply.	0	0	
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.			
	? Score uncertain if site is within 400m of a Conservation area or designated site.			
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++		Regulation 19 Local Plan includes 0.4ha of open space provision and a minor positive effect is identified.
	+ Site includes open space provision but only sufficient to meet the needs of the development.		+	
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
<b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			
	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	

Site Name:	North Quay			
Site Area (ha):	3.27			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	- Not used – see above.			Adjacent to Millwall and West India Docks SINC.  Potential for negative effect identified at Regulation 18 Stage.  The Design Principles in the Regulation 19 Local Plan identify the need to improve biodiversity and ecology and a minor positive effect is identified.
	-- Not used – see above.			
	? Not used – see above.			
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
	++ Site is wholly within flood zone 1			

<b>Site Name:</b>	<b>North Quay</b>			
<b>Site Area (ha):</b>	<b>3.27</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The development considerations highlight the need to accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain,
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).			The site includes brownfield land, also identified as vacant land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	+	+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Reuters LTD</b>			
<b>Site Area (ha):</b>	<b>2.71</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	+ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities proposed that are relevant to this objective, a Primary School and open space are proposed and considered elsewhere in this appraisal.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
<b>3. Health and wellbeing:</b> Improve the health and	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.

Site Name:	Reuters LTD			
Site Area (ha):	2.71			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
wellbeing of the population and reduce health inequalities.	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			Assessed on the basis that has potential for fewer than 500 dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	+	+	
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b			Primarily PTAL 2-4
	+ Site lies within PTAL 3 or 4	+	+	
	0 – not used			
	- Site lies within PTAL 2			
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

Site Name:	Reuters LTD			
Site Area (ha):	2.71			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.	++	++	New Primary School proposed.
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			Local Plan includes the requirement to replace existing employment capacity on site.
	+ Site includes provision for employment related development.	+	+	
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
<b>8. Economic Growth:</b> Create and sustain local economic growth	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			The site allocation includes employment but does not impact on existing employment areas.

Site Name:	Reuters LTD			
Site Area (ha):	2.71			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
across a range of sectors and business sizes.	+ Site would provide employment in a Local Employment Location (LEL).			
	0 Site does not provide employment and does not impact on existing employment areas.	0	0	
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
9. Town Centres: Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Site outside of a town centre and other criteria do not apply (residential proposal which is not likely to include main town centre uses).
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.			
	0 Site outside of a town centre and other criteria do not apply.	0	0	
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>31</sup> that includes main town centre uses. <sup>32</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Potential for a Listed Building to be brought back into beneficial use.			The site contains Statutory Listed Building LB696(a) (Grade II) and lies within an Archaeological Priority Area.
	+ Potential for a locally listed building to be brought back into use.		+/?	
	0 Used if none of the other criteria apply.			

<sup>31</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>32</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Reuters LTD			
Site Area (ha):	2.71			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			The potential for a significant negative effect was identified at Regulation 18 stage. The Design Principles for the site in the Regulation 19 Local Plan do now acknowledge the need to retain, reuse or enhance the existing heritage assets, however the site is within an Archaeological Priority Area so a mixed score is provided at this stage.
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.	→/?		
	? Score uncertain if site is within 400m of a Conservation area or designated site.			The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall Buildings' and Policy D.DH7 'Density'.
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.			Includes 0.4ha of open space.
	+ Site includes open space provision but only sufficient to meet the needs of the development.	+	+	
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption				

Site Name:	Reuters LTD			
Site Area (ha):	2.71			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
measures to reduce and respond to the impacts of climate change.	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Adjacent to The River Thames and tidal tributaries SINC.  Potential for a negative effect on biodiversity identified in this instance at Regulation 18 stage. The Design Principles for the site in the Regulation 19 Local Plan include the need to improve biodiversity and ecology and a minor positive effect is identified on this basis.  Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
	++ Site is wholly within flood zone 1			Within FZ3a.

Site Name:	Reuters LTD			
Site Area (ha):	2.71			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations include the need to accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).			The site includes brownfield land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	+	+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Riverside South</b>			
<b>Site Area (ha):</b>	<b>2.17</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	+ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No new community facilities proposed that are relevant to this objective.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
<b>3. Health and wellbeing:</b> Improve the health and	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.

Site Name:	Riverside South			
Site Area (ha):	2.17			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
wellbeing of the population and reduce health inequalities.	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			Assessed on the basis that has potential for fewer than 500 dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	+	+	
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		++	2017 data indicates that the site is within PTAL 5. The Regulation 18 score reflects older data.
	+ Site lies within PTAL 3 or 4			
	0 – not used			
	- Site lies within PTAL 2	-		
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

Site Name:	Riverside South			
Site Area (ha):	2.17			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.			No new schools proposed on site. Closest existing Primary School is Seven Mills Primary School approximately 570m away and closest existing Secondary School is Bacon's College approximately 1km away
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.	0	0	
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			Site includes employment related activities.
	+ Site includes provision for employment related development.	+	+	
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
<b>8. Economic Growth:</b> Create and sustain local economic growth	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).	++	++	

Site Name:	Riverside South			
Site Area (ha):	2.17			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
across a range of sectors and business sizes.	+ Site would provide employment in a Local Employment Location (LEL).			The proposed employment led site allocation aligns with the site's location within the Canary Wharf Preferred Office Location.
	0 Site does not provide employment and does not impact on existing employment areas.			
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
9. Town Centres: Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Employment uses, likely to include main town centre uses, are proposed on a site area fewer than 5ha entirely within Canary Wharf Major Centre.
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.	+	+	
	0 Site outside of a town centre and other criteria do not apply.			
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>33</sup> that includes main town centre uses. <sup>34</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Potential for a Listed Building to be brought back into beneficial use.			A listed lock wall forms the eastern boundary of the site.
	+ Potential for a locally listed building to be brought back into use.		+	
	0 Used if none of the other criteria apply.			

<sup>33</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>34</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Riverside South			
Site Area (ha):	2.17			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			The potential for a significant negative effect was identified (score at Regulation 18 stage amended).
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.	-/-		The Design Principles in the Regulation 19 Local Plan have been amended to ensure that existing heritage assets, including the listed local wall is retained, re-used or enhanced. A minor positive effect is identified on this basis.
	? Score uncertain if site is within 400m of a Conservation area or designated site.			The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall Buildings' and Policy D.DH7 'Density'.
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++		Regulation 18 score reflects the assumption that strategic scale open space provision would be provided. The Regulation 19 Local Plan confirms that 0.4ha of open space will be provided.
	+ Site includes open space provision but only sufficient to meet the needs of the development.		+	
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere.			
	? Impact on open space provision is uncertain.			
	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption				

Site Name:	Riverside South			
Site Area (ha):	2.17			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
measures to reduce and respond to the impacts of climate change.	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			<p>Adjacent to The River Thames and tidal tributaries SINC and within 55m of Millwall and West India Docks SINC.</p> <p>The potential for a minor negative effect on biodiversity was identified at Regulation 18 stage. The Design Principles in the Regulation 19 Local Plan now include the need to improve biodiversity and ecology along the water edges and within open spaces. A minor positive effect is therefore identified.</p> <p>Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid network' and D.OWS4 'Water spaces'.</p>
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			

Site Name:	Riverside South			
Site Area (ha):	2.17			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1			Within FZ3a.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).			The site includes brownfield land and is identified as vacant land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).	+	+	
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Westferry Printworks</b>			
<b>Site Area (ha):</b>	<b>6.16</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
1. <b>Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.			
	0 Site is within 50% least deprived LSOAs in the Borough	0	0	
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
2. <b>Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			Proposed re-provision of leisure centre.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.	+	+	
	0 Housing or employment with no new facilities provided.			
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			
3. <b>Health and wellbeing:</b> Improve the health and	++ Site includes provision of a new health facility that will serve the wider community.			No new health facilities proposed on site.

Site Name:	Westferry Printworks			
Site Area (ha):	6.16			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
wellbeing of the population and reduce health inequalities.	+ Site safeguards an existing health facility.			
	0 No new health facilities proposed on site	0	0	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).	++	++	Assessed on the basis that site has potential for 500+ dwellings.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			
	0 No housing provided e.g. employment led scheme.			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b			PTAL 1b-2.
	+ Site lies within PTAL 3 or 4			
	0 – not used			
	- Site lies within PTAL 2	-	-	
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			

Site Name:	Westferry Printworks			
Site Area (ha):	6.16			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.	++	++	New Secondary School proposed
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.			
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			Regulation 18 Local Plan did not identify the need to replace employment on site and was assessed on that basis. The Regulation 19 version of the Local Plan identifies the need to provide employment on site and a minor positive effect is identified.
	+ Site includes provision for employment related development.		+	
	0 Housing led scheme on land not in existing employment use.	0		
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	? Impact on existing employment is uncertain.			
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			Would provide employment but does not impact on existing employment areas.
	+ Site would provide employment in a Local Employment Location (LEL).			

Site Name:	Westferry Printworks			
Site Area (ha):	6.16			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
9. Town Centres: Promote diverse and economically thriving town centres.	0 Site does not provide employment and does not impact on existing employment areas.	0	0	Site outside of a town centre and other criteria do not apply (residential proposal which is not likely to include main town centre uses)
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Using the parameters in the SA framework no potential for effects on heritage assets was identified at Regulation 18 stage. The site is outside of the buffer zone of the Maritime Greenwich World Heritage
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.			
	0 Site outside of a town centre and other criteria do not apply.	0	0	
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>35</sup> that includes main town centre uses. <sup>36</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			

<sup>35</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>36</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	<b>Westferry Printworks</b>			
Site Area (ha):	<b>6.16</b>			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			Site but there is potential for development to impact on its setting.
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.			The Design Principles in the Regulation 19 Local Plan identify the need to Protect or enhance the setting of the Maritime Greenwich World Heritage Site and other surrounding heritage assets and a minor positive effect is identified on this basis.
	? Score uncertain if site is within 400m of a Conservation area or designated site.			The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH7 'Shaping and Managing Views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall Buildings' and Policy D.DH7 'Density'.
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.  + Site includes open space provision but only sufficient to meet the needs of the development.  0 Site or associated use does not generate a need for open space.  - Development would result in the loss of open space but partial compensatory land is provided elsewhere.  -- Development would result in the loss of open space and compensatory land is not provided elsewhere.  ? Impact on open space provision is uncertain.	++	++	Includes strategic scale open space provision.
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting.			

Site Name:	Westferry Printworks			
Site Area (ha):	6.16			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
measures to reduce and respond to the impacts of climate change.	+ Not used – see above.			
	0 Score all sites as neutral.	0	0	
	- Not used – see above.			
	-- Not used – see above.			
	? Not used – see above.			
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			Adjacent to Millwall and West India Docks SINC and within 65m of The River Thames and tidal tributaries.  Potential for a negative effect on biodiversity has been identified at Regulation 18 stage.  The Development Principles for the site in the Regulation 19 Local Plan identify the need to improve biodiversity and ecology along the water edges and within open spaces and a minor positive effect is therefore identified.  Other policies in the Draft Local Plan should also help to avoid potential negative effects, e.g. Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid' and D.OWS4 'Water spaces'.
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		+	
	0 if criteria identified for other scores do not apply.			
	- Site is within 100m of a locally designated site Or Protected species likely to be on site.	-		
	-- Site is within 500m of a nationally/internationally designated site.			
	? Impact on biodiversity is uncertain			
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	+ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).			
	0 No effect.	0	0	
	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			

Site Name:	Westferry Printworks			
Site Area (ha):	6.16			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	? Impact is uncertain.			
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1			Within FZ3a.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			The delivery considerations include that development should accord with any flood mitigation and adaptation measures stated within the borough's Level 2 Strategic Flood Risk Assessment (2017) and the sequential test. Whilst these measures will help mitigate flood risk the potential for a significant negative effect is judged to remain, albeit it is acknowledged that the Local Plan seeks to mitigate the risk.
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	-- Site is partially or wholly within flood zone 3 a or 3b	--	--	
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site involves the re-use of previously developed land and buildings (5ha or more).	++	++	The site includes brownfield land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).			
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			

<b>Site Name:</b>	<b>Whitechapel South</b>			
<b>Site Area (ha):</b>	<b>9.5</b>			
<b>Sustainability Objective</b>	<b>Basis for appraising sites</b>	<b>Reg 18 Score</b>	<b>Reg 19 Score</b>	<b>Commentary / Mitigation</b>
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	++ Site is within the 10% most deprived LSOAs in the Borough and provides housing / employment opportunities.			No community facilities proposed that are relevant to this objective - open space and re-provision of health facility is identified and considered elsewhere in this appraisal.
	+ Site is within 10 -50% most deprived LSOAs in the Borough and provides housing/employment opportunities.	+	+	
	0 Site is within 50% least deprived LSOAs in the Borough			
	- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	-- Not used (the score against this objective is only positive to identify development that contributes to addressing deprivation)			
	? Effects on deprived LSOAs uncertain.			
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	++ Site includes a range of facilities (community and faith facilities, Idea Store etc.). Could be safeguarding existing facilities on site or providing new ones. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			No community facilities proposed that are relevant to this objective - open space and re-provision of health facility is identified and considered elsewhere in this appraisal.
	+ Site includes a facility (community and faith facilities, Idea Store etc.) Could be safeguarding existing facility or provision of a new one. Note to avoid 'double counting' health facilities should only be accounted for under SA Objective 3 and schools under Objective 6.			
	0 Housing or employment with no new facilities provided.	0	0	
	- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	-- Not used (on basis of assumption that proposed development would not lead to net loss of community facilities)			
	? Uncertain if facilities will be provided.			

Site Name:	Whitechapel South			
Site Area (ha):	9.5			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
3. <b>Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.	++ Site includes provision of a new health facility that will serve the wider community.			Both versions of the Local Plan includes requirement for re-provision of health facility (Regulation 18 score amended accordingly).
	+ Site safeguards an existing health facility.	+	+	
	0 No new health facilities proposed on site			
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	-- Not used (on basis that proposed development site would not lead to net loss of community facilities)			
	? Effects on health facilities are uncertain.			
4. <b>Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).			The Regulation 18 Local Plan did not include an allowance for housing. The Regulation 19 Local Plan includes allowance for housing and a minor positive effect is identified.
	+ Site provides a net gain of 499 or fewer dwellings (assessed on the basis of the minimum number of dwellings that would be provided).		+	
	0 No housing provided e.g. employment led scheme.	0		
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	- Not used (on basis that the plan will lead to an overall gain in housing, including affordable housing).			
	? Impact on housing is uncertain.			
5. <b>Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b	++	++	PTAL 6a
	+ Site lies within PTAL 3 or 4			
	0 – not used			
	- Site lies within PTAL 2			

Site Name:	Whitechapel South			
Site Area (ha):	9.5			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	-- Site lies within PTAL 1a or b			
	? Only used if there is some other factor that creates uncertainty, e.g. in relation to capacity of the transport network.			
<b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	++ Site includes provision of a new school that will meet wider needs.			No new schools proposed. Closest existing Primary School is Kobi Nazrul Primary School 188m away and closest existing Secondary School is Wapping High School 79m away.
	+ Site safeguards/expands an existing school on site.			
	0 Employment, commercial or other type of scheme with no impact on existing schools or housing site that relies on new or existing capacity elsewhere that is within 800m of a Primary School or 3km of a Secondary School with capacity.	0	0	
	- Site relies on an existing Primary School that is over 800m away Or Site relies on a Secondary School that is over 3km away			
	- Site relies on an existing Primary School that is over 800m away with no capacity. Or Site relies on a Secondary School that is over 3km away with no capacity.			
	? Impacts on education facilities are uncertain.			
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	++ Not used at this stage due to uncertainties around the scale and significance of employment provision.			Employment led development proposed.
	+ Site includes provision for employment related development.	+	+	
	0 Housing led scheme on land not in existing employment use.			
	- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			
	-- Not used (on basis that the plan should lead to an overall increase in employment land, including provision for any firms affected by redevelopment).			

Site Name:	Whitechapel South			
Site Area (ha):	9.5			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	? Impact on existing employment is uncertain.			
<b>8. Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).			Employment led development, partly within the Whitechapel Local Employment Location.
	+ Site would provide employment in a Local Employment Location (LEL).	+	+	
	0 Site does not provide employment and does not impact on existing employment areas.			
	- Development would result in the loss of employment in a LEL			
	-- Development would result in the loss of employment in the City Fringe, a SIL or POL.			
	? Impact on SIL, POL and LEL is uncertain.			
<b>9. Town Centres:</b> Promote diverse and economically thriving town centres.	++ Site of 5ha or more within a town centre that includes main town centre uses (as defined in the NPPF).			Employment uses, likely to include main town centre uses, are proposed on a total site area exceeding 5ha. The site lies within Whitechapel district centre, although additional land is in edge of centre locations.
	+ Site of less than 5ha within a town centre that includes main town centre uses, or site delivers new local centre, including retail facilities, the need for which has been identified through the Town Centre Retail Capacity Study.	+	+	
	0 Site outside of a town centre and other criteria do not apply.			
	- Site of less than 5ha outside of either a town centre or edge of centre <sup>37</sup> that includes main town centre uses. <sup>38</sup>			
	-- Site of 5ha or more outside of a town centre and edge of centre that includes main town centre uses			
	? Uncertain if site will include town centre uses.			

<sup>37</sup> The NPPF defines edge of centre for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

<sup>38</sup> The NPPF defines main town centre uses as Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Site Name:	Whitechapel South			
Site Area (ha):	9.5			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>10. Design and Heritage:</b> Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	++ Potential for a Listed Building to be brought back into beneficial use.			The site contains the following statutorily listed buildings: LB404, LB435, LB436, LB437, LB438, LB438, LB439, LB440, LB473, LB667, LB831, LB835, LB668, LB835, LB611, LB921, LB766, LB770, LB666(a) (all Grade II) LB564(a) (Grade II*). The site also includes Locally Listed Building D7 and is partially within an Archaeological Priority Area. The potential for a significant negative effect was identified at Regulation 18 stage.
	+ Potential for a locally listed building to be brought back into use.		+	
	0 Used if none of the other criteria apply.			
	- Site includes or is within a heritage feature of local / regional importance (including Conservation Area and Archaeological Priority Area) Or Site is within a valued local view			
	-- site includes a heritage feature of national importance Or Site potentially impacts on a WHO or its buffer zone.	--/?		The Design Principles for the site in the Regulation 19 Local Plan identify the need to protect or enhance heritage assets and character on site and in the surrounding areas. A minor positive effect is identified on this basis.
<b>11. Open space:</b> Enhance and increase open spaces that are high quality, networked and multi-functional.	? Score uncertain if site is within 400m of a Conservation area or designated site.			The actual effect on heritage features will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan in relation to design and heritage. Relevant policies include: Policy S.DH1 'Delivering high quality design, Policy D.DH2 'Attractive streets, spaces and public realm', Policy S.DH3 'Heritage and the historic environment', Policy D.DH4 'Shaping and managing views,' Policy S.DH5 'World heritage sites', Policy D.DH6 'Tall buildings' and Policy D.DH7 'Density'.
	++ Site includes open space provision of a scale that will help meet wider needs, this could include improvements to publicly accessible space.	++	++	Includes strategic scale open space provision
	+ Site includes open space provision but only sufficient to meet the needs of the development.			
	0 Site or associated use does not generate a need for open space.			
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.			

Site Name:	Whitechapel South			
Site Area (ha):	9.5			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
	-- Development would result in the loss of open space and compensatory land is not provided elsewhere. ? Impact on open space provision is uncertain.			
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	++ Considered to be neutral across projects as all projects will need to comply with the London Plan in relation to the provision of on-site renewables and carbon off-setting. + Not used – see above. 0 Score all sites as neutral. - Not used – see above. -- Not used – see above. ? Not used – see above.			
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment). + Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment). 0 if criteria identified for other scores do not apply. - Site is within 100m of a locally designated site Or Protected species likely to be on site. -- Site is within 500m of a nationally/internationally designated site. ? Impact on biodiversity is uncertain	0	0	No natural heritage designations within threshold distances.
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment). + Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment). 0 No effect.	0	0	

Site Name:	Whitechapel South			
Site Area (ha):	9.5			
Sustainability Objective	Basis for appraising sites	Reg 18 Score	Reg 19 Score	Commentary / Mitigation
<b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding	- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			Within FZ1.  As the site is >1ha, it will be subject to a site specific flood risk assessment to assess all sources of flood risk.
	-- Not used (evaluation of any negative effects requires a level of detail absent at this stage of site appraisal and assessment).			
	? Impact is uncertain.			
<b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++ Site is wholly within flood zone 1	++	++	The site includes brownfield land. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses.
	+ Majority of site is within flood zone 1, with remainder in flood zone 2			
	0 not used			
	- Majority of site is within flood zone 2, with remainder in flood zone 1			
	--Site is partially or wholly within flood zone 3 a or 3b			
	? Uncertain as to which flood zone(s) site is in. If site is in more than one flood risk zone score against the highest risk area.			
	++ Site involves the re-use of previously developed land and buildings (5ha or more).	++	++	
	+ Site involves the re-use of previously developed land and buildings (less than 5ha).			
	0 – Site safeguarded for existing use.			
	- Site involves the loss of previously undeveloped land (less than 5ha).			
	-- Site involves the loss of previously undeveloped land (5ha or more).			





## Appendix N Review Against NPPF



## Appendix N:

### Draft Policy Review - Indicative NPPF Compliance

The Tables below summarise compliance with the NPPF. In some instances reference has also been made to the London Plan and supporting Supplementary Planning Documents. This exercise was first undertaken to inform the Regulation 18 Draft Local Plan and has been updated to reflect the content of the Regulation 19 Draft Local Plan.

#### High level considerations

<b>NPPF Requirements</b>	<b>LBTH Policies</b>
Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements? Is the plan justified? Is it based on robust and credible evidence? Is it the most appropriate strategy when considered against the alternatives? A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.	Policy S.H1 'Meeting housing needs' and supporting text sets out how the strategy seeks to meet objectively assessed requirements and additional requirements arising from the London Plan. Policy S.EMP1 and supporting text set out the background in terms of the target for employment provision.  There is no consideration of alternative spatial strategies (distribution of development within the Borough) – this is because the London Plan identifies strategic locations for growth in the Borough and the Local Plan must be in conformity with the London Plan.  The plan is not explicit in terms of the balance between housing and employment provision and the optimum overall balance between the two, again this reflects the role of the London Plan in setting targets for housing and employment growth in the Borough.
<b>Amec Foster Wheeler Observations (Recommendations are shown in bold)</b>	
The Plan seeks to meet the requirements for new homes and employment set out in the London Plan to 2031.  The majority of policies are justified – some detailed observations are provided below under specific topics. Areas where the evidence base needs strengthening are identified in the document and are being addressed. The Local Plan provides more background on the housing and employment targets arising from the London Plan and the implications of meeting them over the plan period.  A general recommendation from a previous iteration of the SA was that the wording of some policies should be reviewed to ensure that they are compliant with the NPPF, e.g. prefacing policies with ' <i>development will be permitted where if...</i> etc. The Council has addressed this comment.	

#### Building a Strong, Competitive Economy

<b>NPPF Requirements</b>	<b>LBTH Policies</b>
An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose). (22)	Spatial Policy S.EMP1 'Creating investment and jobs' Policy D.EMP2 'New employment space' Policy D.EMP3 'Loss of employment space and

	Policy D.EMP4 'Redevelopment within the borough's employment areas.'
<b>Amec Foster Wheeler Observations (Recommendations are shown in bold)</b>	
The Employment Land Review has been undertaken and this highlights a significant shortfall in industrial floorspace provision that provides the bases for protecting existing sites.	
A previous recommendation (at the Regulation 18 stage) was that the requirement for vacant employment sites to be marketed for 24 months needed further justification. Reference was added to the Employment Land Review (2016) in Policy EMP4 of the Regulation 18 Local Plan (now Policy D.EMP3). It is noted that this reference has not been carried forward into the Regulation 19 Local Plan. The Employment Land Review 2016 provides sufficient justification for the requirement and is referenced in the evidence base. Based on experience since the Regulation 18 IIA was undertaken it was also recommended that the Policy is amended to say 'active marketing <b>continuously</b> over a period of at least 24 months'. This recommendation has been incorporated in the Regulation 19 Draft Local Plan in Policy D.EMP4.	
The May 2016 note on the IIA recommended that the council consider adding a justification for the presumption against live-work and work-live units (now Policy D.EMP2) and note that this was added at Regulation 18 stage and has been retained in the Regulation 19 version of the Local Plan.	
The May 2016 note on the IIA recommended adding a cross reference to the Council's Planning Obligations SPD to ensure that local people and existing firms have the chance to benefit from local training, employment/procurement during both construction and operational phases and it is noted that S.SG1 references these principles.	
This recommendation raised a more general question as to whether or not the Local Plan provided the necessary 'policy hook' for the Planning Obligations SPD and it is noted that Policy D.SG5 on developer contributions and its supporting text provides the hook.	

#### Delivering a Wide Choice of High Quality Homes

NPPF Requirements	LBTH Policies
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p> <p>Set out the authority's approach to housing density to reflect local circumstances.(47)</p> <p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (159)</p> <p>Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing</p> <p><b>Planning Policy for Traveller Sites, August 2015</b></p> <ul style="list-style-type: none"> <li>a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets</li> <li>b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15</li> <li>c) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)</li> <li>d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density</li> <li>e) protect local amenity and environment.</li> </ul>	<p><b>LBTH Policies</b></p> <p>Policy S.H1 is concerned with meeting housing needs. Other policies are as follows:</p> <p>Policy D.H2 'Affordable housing'</p> <p>Policy D.H3 'Housing standards and quality'</p> <p>PolicyD.H4 'Specialist housing'</p> <p>Policy D.H5 'Gypsies and traveller accommodation'</p> <p>Policy D.H6 'Student housing'</p> <p>Policy D.H7 'Housing with shared facilities (houses in multiple occupation)'.</p>
<b>Amec Foster Wheeler Observations (Recommendations are shown in bold)</b>	
The overall requirement to 2031 has been established and policy S.H1 and supporting text set out how this will be met, there is some uncertainty in relation to the latter phase of the plan period but the Borough Council has indicated	

that it is confident that the target can be met over the plan period. The Council is also committed to keeping the plan under review.

The draft policies reflect local issues, e.g. size and tenure of housing required and deliverability of a range of affordable housing.

Policy S.H1 safeguards the existing Gypsy and Traveller site at Old Willow Close. It is recommended that the safeguarded site is identified on the Proposals Map once it is prepared.

The supporting text to policy S.H1 highlights the need to seek financial contributions from sites of less than 10 units because of the need for affordable housing. This is consistent with London Plan Policy 3.13 which states: "*Boroughs are encouraged to seek a lower threshold through the LDF process where this can be justified in accordance with guidance, including circumstances where this will enable proposals for larger dwellings in terms of floorspace to make an equitable contribution to affordable housing provision.*"

### Promoting sustainable transport

<b>NPPF Requirements</b>	<b>LBTH Policies</b>
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p> <p>Supporting high quality communications infrastructure (paras 42-46)</p> <p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p>	<p>S.TR1 'Sustainable travel'</p> <p>Policy D.TR2 'Impacts on the transport network'</p> <p>Policy D.TR3 'Parking and permit – free'</p> <p>Policy D.TR4 'Sustainable delivery and servicing'</p> <p>Policies D.SG4 and D.TR4 encourages the use of Construction and/or Freight Consolidation Centres (NPPF para 35).</p> <p>Section 4 of the plan, including strategic sites, provides details of the facilities required at strategic sites, including health and education facilities (NPPF para 38).</p>

<p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	
<p><b>Amec Foster Wheeler Observations (Recommendations are shown in bold)</b></p> <p>The range and content of the policies appears to be broadly reasonable, and accord with the intentions of the NPPF. Policy S.TR1 states that proposals will be expected to be focused within areas with high levels of public transport accessibility and/or areas identified within the town centre hierarchy set out in policy S.TC1, in respect of developments generating significant levels of trips. A previous recommendation was that the justification for the policy could provide advice on how future applications should demonstrate a) public transport accessibility is appropriate b) public transport can accommodate the development. This has been addressed in the supporting text to D.TR2.</p>	

#### Ensuring the vitality of town centres

<p><b>NPPF Requirements</b></p> <p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period. (23)</p> <p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres. (23)</p>	<p><b>LBTH Policies</b></p> <p>Policy S.TC1 'Supporting the network and hierarchy of centres'</p> <p>D.TC2 'Retail in our town centres.'</p> <p>D.TC3 'Retail outside our town centres'</p> <p>D.TC4 'Financial and professional services'</p> <p>D.TC5 'Food, drink, entertainment and the night-time economy'</p> <p>D.TC6 'Short-stay accommodation'</p> <p>D.TC7 'Markets'</p>
<p><b>Amec Foster Wheeler Observations</b></p> <p>The range and content of the policies appears to be broadly reasonable, and accord with the intentions of the NPPF. A previous recommendation was that a reference to the GLA's SPG on Town Centres could be provided in the introductory text. Reference to the SPG has been added to the evidence links for the Chapter.</p> <p>A previous recommendation was that a list of District Centres be included in policy – this has been addressed in Policy S.TC1.</p> <p>A previous recommendation was for justification for solid shutters not being permitted, e.g. to make the area more welcoming in the evening. This has been addressed in the justification for D.DH9 'Shopfronts'.</p> <p>A previous recommendation was that the Plan could cross-reference the Council's Statement of Licensing Policy – this has been addressed and the relevant policy is now D.TC5.</p> <p>A previous recommendation was that policy on the night-time economy (D.TC5) could draw more from the GLA's SPG on Town Centres (pages 23 to 24). As noted above, the town centres SPG has been added to the evidence base.</p>	

#### Green Infrastructure

<p><b>NPPF Requirements</b></p> <p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these. (73)</p> <p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space'. (76-78)</p> <p>Protect valued landscapes. (109)</p> <p>Prevent unacceptable risks from pollution and land instability.</p> <p>(109)Encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider</p>	<p><b>LBTH Policies</b></p> <p>S.OWS1 'Creating a network of open spaces'</p> <p>S.OWS2 'Enhancing the network of water spaces.'</p> <p>D.OWS3 'Open Space and green grid network'</p> <p>D.OWS4 'Water spaces'.</p>
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<p>the case for setting a locally appropriate target for the use of brownfield land (111).</p> <p>Set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks. (113)</p> <p>Local planning authorities should: (114)</p> <p>set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure</p> <p>Planning policies should minimise impacts on biodiversity and geodiversity. (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries. (117)</p>	
<p><b>Amec Foster Wheeler Observations (Recommendations are shown in bold)</b></p> <p>The range and content of the policies appears to be broadly reasonable, and accord with the intentions of the NPPF. It was previously suggested that the Plan could acknowledge the All London Green Grid and the contribution that green spaces within the Borough contribute to it. Chapter 8 of the Local Plan acknowledges the All London Green Grid in the supporting text and references the relevant SPG in the evidence links.</p>	

#### Conserving and enhancing the historic environment

<b>NPPF Requirements</b>	<b>LBTH Policies</b>
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk. (126)</p> <p>Paragraphs 132 to 134 relate to the impact of proposed development on the significance of a designated heritage asset.</p> <p>Paragraph 135 relates to non-designated heritage assets.</p>	<p>Policy S.DH1 'Delivering high quality design'</p> <p>Policy S.DH3: Heritage and the historic environment</p> <p>Policy D.DH4 'Shaping and managing views'</p> <p>S.DH5: World heritage sites</p> <p>Section 4 of the Local Plan, including Strategic Sites sets out design principles, including those relating to built heritage.</p>
<p><b>Amec Foster Wheeler Observations (Recommendations are shown in bold)</b></p> <p>Previous recommendations as follows:</p> <p>Consider whether or not Policy S.DH.3 reflects the language and principles set out in the NPPF at paragraphs 132 to 134 and paragraph 138 in relation to the significance of designated heritage assets and their conservation, the concepts of substantial and less than substantial harm etc.</p> <p>Paragraph 135 of the NPPF relates to non-designated assets and set out the principles for determining applications that affect them.</p> <p>Consider splitting Policy S.DH3 into two parts, one dealing with proposals affecting designated assets and one dealing with non-designated assets.</p> <p>Consider whether or not the same comments apply to Policy S.DH.5: World heritage sites, for example the language used in relation to assessing harm on their setting.</p> <p>Policy S.DH3 has been amended and uses the terminology in the NPPF. S.DH4 has been amended to refer to Outstanding Universal Value.</p>	

### Requiring good design

<p><b>NPPF Requirements</b></p> <p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area. (58)</p>	<p><b>LBTH Policies</b></p> <p>S. DH1 'Delivering high quality design'  D.DH2 'Attractive streets, spaces and public realm'.  S.DH3 'Heritage and the historic environment'  D.DH4 'Shaping and managing views'  S.DH5 'World heritage sites'  D.DH6 'Tall buildings.'  D.DH7 'Density'  D.DH8 'Amenity'  D.DH9 'Shopfronts'  D.DH10 'Advertisements, hoardings and signage' and  D.DH11 Telecommunications</p>
<p><b>Amec Foster Wheeler Observations (Recommendations are shown in bold)</b></p> <p>The range and content of the policies appears to be broadly reasonable, and accord with the intentions of the NPPF. It was previously suggested that the plan could reference the use of 'designing out crime' principles. This has been addressed in Spatial Policy D.DH2.</p>	

### Promoting healthy communities

<p><b>NPPF Requirements</b></p> <p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments. (69)</p> <p>Policies should plan positively for the provision and use of shared space, community facilities and other local services. (70)</p>	<p><b>LBTH Policies</b></p> <p>Policy S.DH1 'Delivering high quality design'  D.DH2 'Attractive streets, spaces and public realm'  Spatial Policy S.CF1 Supporting community facilities  Policy D.CF2 'Existing community facilities'  Policy D.CF3 'New and enhanced community facilities'  D.CF4 'Public houses'</p>
<p><b>Amec Foster Wheeler Observations (Recommendations are shown in bold)</b></p> <p>A previous recommendation was that the plan could consider an explicit reference to the provision of facilities through shared spaces, Policies S.PCF1 and D.CF3 encourage shared facilities.</p>	

### Climate Change, Minerals, Resources and Energy

<p><b>NPPF Requirements</b></p> <p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p> <p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p> <p>Minimise vulnerability to climate change and manage the risk of flooding. (99)</p> <p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be</p>	<p><b>LBTH Policies</b></p> <p>Policy S.SG2 'Delivering sustainable growth in Tower Hamlets,  D.ES3 'Urban greening and biodiversity'  D.ES4 'Flood risk'  D.ES5 'Sustainable drainage'  D.ES6 'Sustainable water management'  D.ES7 'A zero carbon borough'  D.ES8 'Contaminated land and storage of hazardous substances"  D.ES10 'Overheating'  S.MW1 'Managing our waste,'</p>
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<p>worked where they are found, it is important to make best use of them to secure their long-term conservation. (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials. (146)</p> <p>the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat) (156);</p>	<p>D.MW2 'New and enhanced waste facilities' and D.MW3 'Waste collection facilities in new development'</p>
<p><b>Amec Foster Wheeler Observations (Recommendations are shown in bold)</b></p> <p>Policy ES4 identifies the need to consider issues associated with the Urban Heat Island Effect and this is supported. A previous recommendation was that the Plan could identify areas of the Borough that might be more susceptible to this effect. The recommendation was addressed at Regulation 18 stage and has been retained in the Regulation 19 Local Plan. The justification for Policy D.ES3 identifies types of areas that can experience the Heat Island effect and also specific designations that may be more susceptible.</p>	



