



Meeting of the

CABINET

Tuesday, 1 November 2016 at 5.30 p.m.

A NEW LOCAL PLAN – APPENDICES PACK TWO

	PAGE NUMBER
5 .5 Our Borough, Our Plan: A New Local Plan Consultation Document (Regulation 18)	393 - 982

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London Borough of Tower Hamlets

Integrated Impact Assessment accompanying 'Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Consultation Draft'

Appendices

Draft Report for Cabinet



October 2016

Amec Foster Wheeler Environment
& Infrastructure UK Limited



Report for

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Document revisions

No.	Details	Date
1	Initial Draft to client	17 th October 2016
	Revised Draft	20 th October 2016

Appendix A: Response to consultation comments on the Sustainability Appraisal Scoping Report

Consultee	Consultation Comments	LBTH Response
Historic England	<ul style="list-style-type: none"> • Include a specific SA objective which states: “conserve and enhance the historic environment, heritage assets and their settings”. 	<ul style="list-style-type: none"> • SA Objective 10 has been changed to better reflect Historic England’s guidance and the NPPF’s wording.
Environment Agency	<ul style="list-style-type: none"> • 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. • Reference the updated Thames RBMP • Use the latest data regarding chemical and biological water quality in watercourses • Further information regarding per capita or household consumption of daily water use and water availability and the classification of water stressed areas are available. • Recommend referencing of ‘Model procedures for the management of land contamination (CLR11)’ 	<ul style="list-style-type: none"> • Appendix A has been updated • Appendix A has been updated • Appendix B has been updated • 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 • Appendix A has been updated
Natural England	<ul style="list-style-type: none"> • Baseline indicators should make reference to the relevant National Character Area (NCA) profile. • Consider the relevant ‘shoreline management plan’ or equivalent document in recognition of the borough’s flood risk categorisation • 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. • Policies should address the spread of invasive non-native species. 	<ul style="list-style-type: none"> • Appendix A has been updated • No action, as the following Shoreline Management Plans / Equivalent have already been included in the scoping document: <ul style="list-style-type: none"> ○ Thames Region Catchment Flood Management Plan, 2009 ○ River Basin Management Plan, Thames River Basin District, 2015 ○ Thames Estuary 2100 Action Plan: Managing Flood Risk Through London and the Thames Estuary, 2012 • The HRA screening will review the potential for likely significant effects on European sites and any significant effects on other non-designated sites will be considered against the biodiversity objective within the SA. • A draft policy preventing the planting of invasive, non-native species has been included.

	<ul style="list-style-type: none"> • The SA should better reflect the All London Green Grid and stress the multi-functional nature of green infrastructure • 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. • 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. • The monitoring provision for the local plan should be flexible in order to respond to changes in the evidence base. • Promote 'living buildings technology'. • SA and SEA work should focus on the significant positive opportunities that the All London Green Grid offers for policy formulation. 	<ul style="list-style-type: none"> • 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. • The current Local Plan policy (which is proposed to be retained) already prompts buffering for sites adjacent to SINCs • The SA Framework will have additional criteria to guide the assessment of potential effects on local nature conservation designations and protected species • This will be considered when monitoring framework developed • A draft policy which retains and enhances requirements for living building elements has been included. • 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.
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Appendix B

Quality Assurance Checklist for SEA/SA Elements of the IIA	
Objectives and Context	
<ul style="list-style-type: none"> The plan's purpose and objectives are made clear. 	Section 1.2 of the main report.
<ul style="list-style-type: none"> Sustainability issues, including international and EC objectives, are considered in developing objectives and targets. 	Key sustainability issues identified through a review of relevant plans and programmes (see Section 2.2 and 2.4) and analysis of baseline conditions (see Appendix D) have informed the development of the SA Framework presented in Appendix F .
<ul style="list-style-type: none"> SEA objectives are clearly set out and linked to indicators and targets where appropriate. 	Section 2.7 presents the SA objectives and these are presented in Appendix F 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"> Links with other related plans, programmes and policies are identified and explained. 	A review of related plans and programmes is contained at Appendix E and summarised in Section 2.2 of this Report.
Scoping	
<ul style="list-style-type: none"> The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report. 	The environmental bodies were consulted on the Scoping Report between 14th December 2015 and 8th February 2016.
<ul style="list-style-type: none"> The assessment focuses on significant issues. 	Sustainability issues have been identified in the baseline analysis contained in Appendix C . Section 2.2 summarises the key sustainability issues identified.
<ul style="list-style-type: none"> Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit. 	Discussed in Section 2 of this report.
<ul style="list-style-type: none"> Reasons are given for eliminating issues from further consideration. 	No issues have been knowingly eliminated from the assessment at this stage.
Baseline Information	
<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and their likely evolution without the plan are described. 	Appendix D 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"> 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. 	Throughout Section 3 of this Report, reference is made to areas which may be affected by the Local Plan. It should be noted that the quantum of growth to be provided in the Local Plan and its distribution across the Borough to 2031 has not yet been decided and will be determined through discussion with the Greater London Authority. The London Plan directs growth to Opportunity Areas within the Borough and the assessment has considered the potential effects associated with key sites.
<ul style="list-style-type: none"> Difficulties such as deficiencies in information or methods are explained. 	Discussed in Section 2 of this report.
Prediction and evaluation of likely significant effects	
<ul style="list-style-type: none"> 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. 	Section 3.2 summarises the appraisal of the sustainability performance of the Local Plan. It assesses the Vision and Key objectives Policies and strategic sites. Detailed appraisal matrices are also provided at Appendix J (policies) and K (strategic sites).

Quality Assurance Checklist for SEA/SA Elements of the IIA	
<ul style="list-style-type: none"> Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed. 	Positive and negative effects are considered within the appraisal matrices and within Section 3.2. Potential effects are identified in the short, medium and long-term.
<ul style="list-style-type: none"> Likely secondary, cumulative and synergistic effects are identified where practicable. 	The potential for cumulative and synergistic effects is considered in Section 3.4 and in appendix J.
<ul style="list-style-type: none"> Inter-relationships between effects are considered where practicable. 	Inter-relationships between effects are identified in the assessment commentary, where appropriate.
<ul style="list-style-type: none"> Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds. 	These are identified in the commentary, where appropriate.
<ul style="list-style-type: none"> Methods used to evaluate the effects are described. 	These are described in Section 2.6 of the report.
Mitigation measures	
<ul style="list-style-type: none"> Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated. 	Recommendations are presented in Section 3.7.
<ul style="list-style-type: none"> Issues to be taken into account in development consents are identified. 	Recommendations are presented in Section 3.7.
The SA Report	
<ul style="list-style-type: none"> Is clear and concise in its layout and presentation. 	The SA Report is clear and concise.
<ul style="list-style-type: none"> Uses simple, clear language and avoids or explains technical terms. Uses maps and other illustrations where appropriate. 	Maps and tables have been used to present the baseline information in Appendix D where appropriate.
<ul style="list-style-type: none"> Explains the methodology used. Explains who was consulted and what methods of consultation were used. 	Section 2 presents the methodology used for assessment whilst consultation arrangements are discussed in Section 1.
<ul style="list-style-type: none"> Identifies sources of information, including expert judgement and matters of opinion. 	Information is referenced throughout the SA Report.
<ul style="list-style-type: none"> Contains a non-technical summary 	Included.
Consultation	
<ul style="list-style-type: none"> The SEA is consulted on as an integral part of the plan-making process. 	This SA Report is being consulted upon at the same time as the Draft Local Plan consultation document.
<ul style="list-style-type: none"> 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. 	This SA Report is being consulted upon at the same time as the Draft Local Plan consultation document.
Decision-making and information on the decision	
<ul style="list-style-type: none"> The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan. 	Responses received to this SA Report will inform the preparation of the Local Plan.
<ul style="list-style-type: none"> An explanation is given of how they have been taken into account. 	This information will be provided in subsequent SA Reports.
<ul style="list-style-type: none"> Reasons are given for choices in the adopted plan, in the light of other reasonable options considered. 	This information will be provided as the Local Plan is developed.

Appendix C: Method for developing the Sustainability Objectives

SEA/ Sustainability Dimension	Sustainability Appraisal Objectives of Core Strategy (Section 2.6)	Summary of policy, plans, and programmes (Section 2.7)	Sustainability issues (Section 3.4)	South Quay Masterplan SEA	Suggested Sustainability Objectives for Local Plan (section 4.3)
<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.

SEA/ Sustainability Dimension	Sustainability Appraisal Objectives of Core Strategy (Section 2.6)	Summary of policy, plans, and programmes (Section 2.7)	Sustainability issues (Section 3.4)	South Quay Masterplan SEA	Suggested Sustainability Objectives for Local Plan (section 4.3)
<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.

SEA/ Sustainability Dimension	Sustainability Appraisal Objectives of Core Strategy (Section 2.6)	Summary of policy, plans, and programmes (Section 2.7)	Sustainability issues (Section 3.4)	South Quay Masterplan SEA	Suggested Sustainability Objectives for Local Plan (section 4.3)
			provide the highest number of places. Major skills gap between local residents and the jobs available		
<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>	To improve health, promote healthy lifestyles and reduce health inequalities. To maximise the accessibility to key services and amenities.	Protect human health and reduce health inequalities.	High levels of health inequality Life expectancy, mortality rates are worse than average, but improving. Environmental factors contribute to poor health ie. air, take-way shops. Poor child health Poor mental health	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.

SEA/ Sustainability Dimension	Sustainability Appraisal Objectives of Core Strategy (Section 2.6)	Summary of policy, plans, and programmes (Section 2.7)	Sustainability issues (Section 3.4)	South Quay Masterplan SEA	Suggested Sustainability Objectives for Local Plan (section 4.3)
			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 adaptation 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

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	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

SEA/ Sustainability Dimension	Sustainability Appraisal Objectives of Core Strategy (Section 2.6)	Summary of policy, plans, and programmes (Section 2.7)	Sustainability issues (Section 3.4)	South Quay Masterplan SEA	Suggested Sustainability Objectives for Local Plan (section 4.3)
<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.

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			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.

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Trans- boundary cooperation	-	Foster trans-boundary cooperation and co-delivery of strategies and services to address issues where appropriate.	Governance and coordination of trans-boundary matters is significant in addressing (but not limited to): <ul style="list-style-type: none"> • Housing • Waste • Heritage • Water • Flood risk • Transport • Energy Conversely, Local Plan may affect areas outside of the borough. Duty to cooperate	-	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"> • View 5: Greenwich Park to Central London • View 10: Tower Bridge 	The borough may wish to undertake local view assessments to understand whether there are local views which should be protected.	To achieve a planned and aesthetically balanced skyline, as seen in protected views. To protect views and the visual amenity of people living and working in and visiting the area and surroundings.	Design and Heritage: Enhance and protect heritage and cultural assets; distinctive character and an attractive built environment.

SEA/ Sustainability Dimension	Sustainability Appraisal Objectives of Core Strategy (Section 2.6)	Summary of policy, plans, and programmes (Section 2.7)	Sustainability issues (Section 3.4)	South Quay Masterplan SEA	Suggested Sustainability Objectives for Local Plan (section 4.3)
		<ul style="list-style-type: none"> • View 24: Island gardens, Isle of Dogs to Royal Naval College • View 25: The Queen's Walk to Tower of London 			
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

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 km². 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 (IDAOPI).

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.

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.

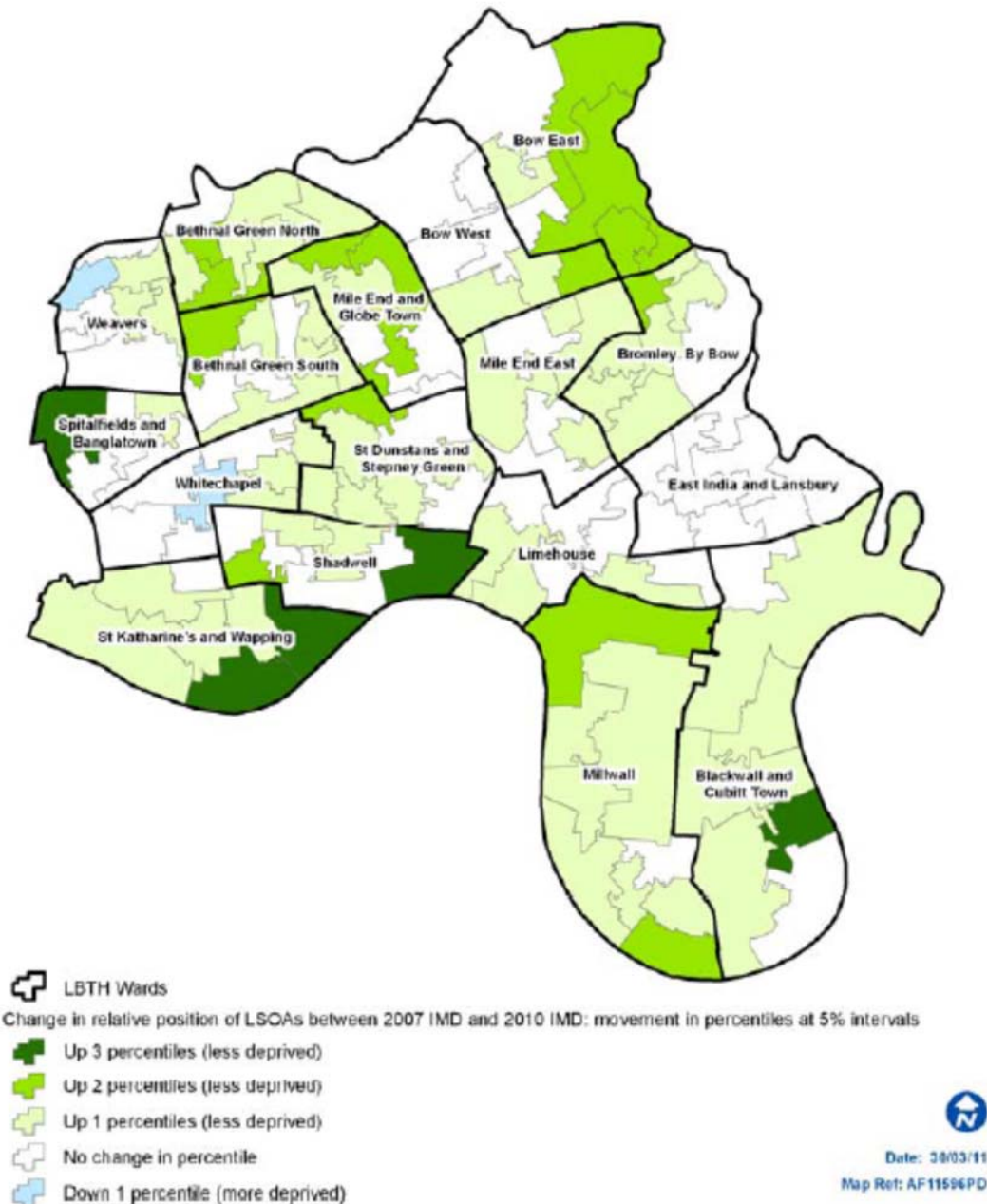


Figure 2: Change in IMD between 2007 and 2010. Source: Indices of Deprivation 2010, DCLG in LBTH, 2011.

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.

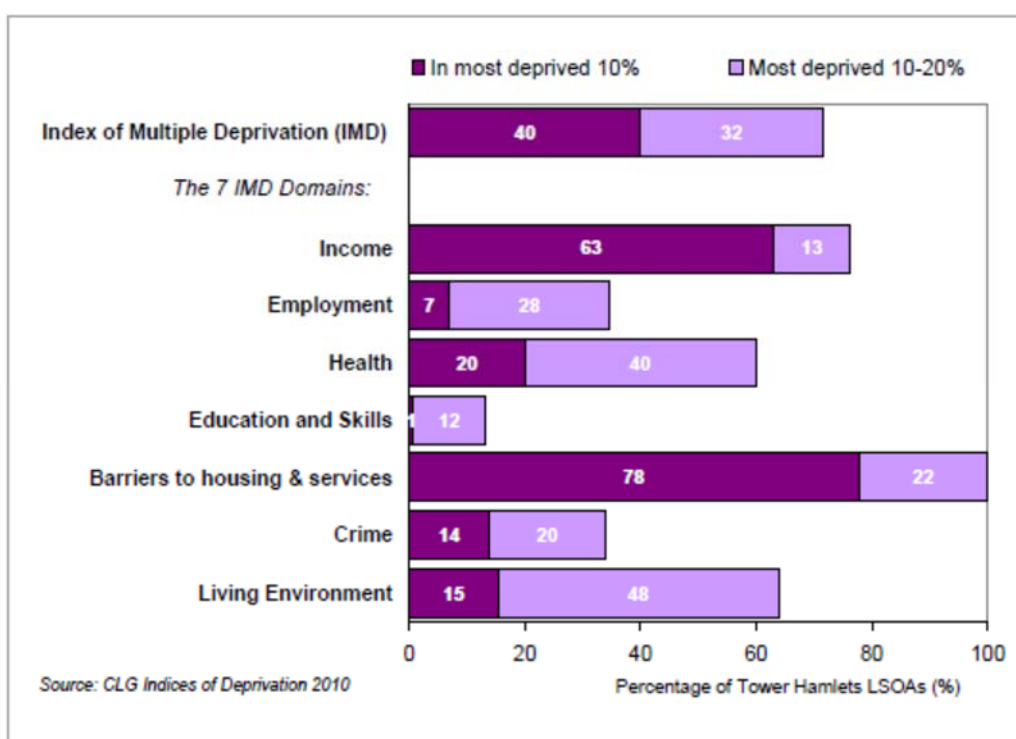


Figure 3: : Percentage of Tower Hamlets LSOAs among the most deprived in England for the IMD 2010 and the 7 domains. Source: CLG Indices of Deprivation in LBTH, 2011.

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.

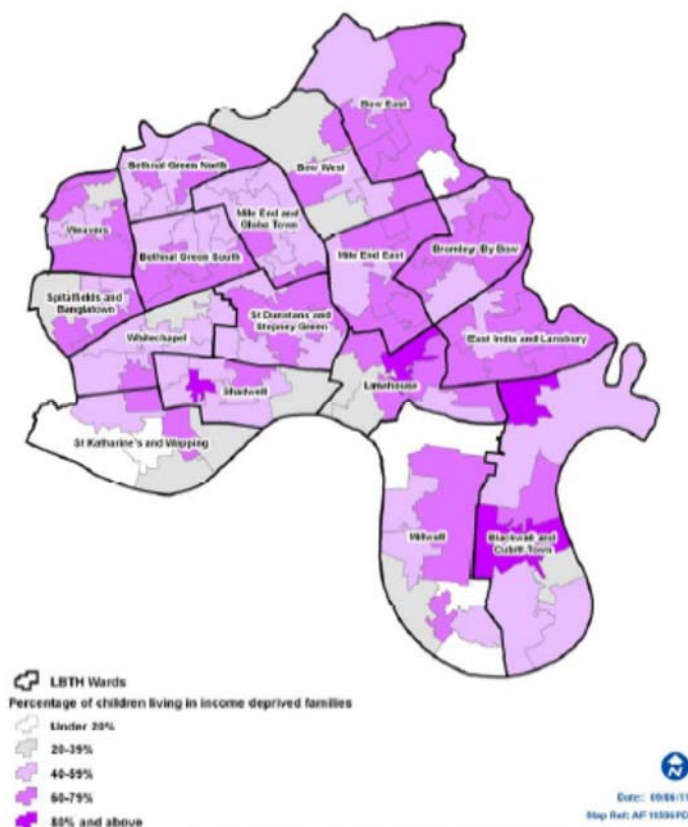


Figure 4: Percentage of children living in income deprived families, Source: Indices of Deprivation of Communities and Local Government, in LBTH, 2011.

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.

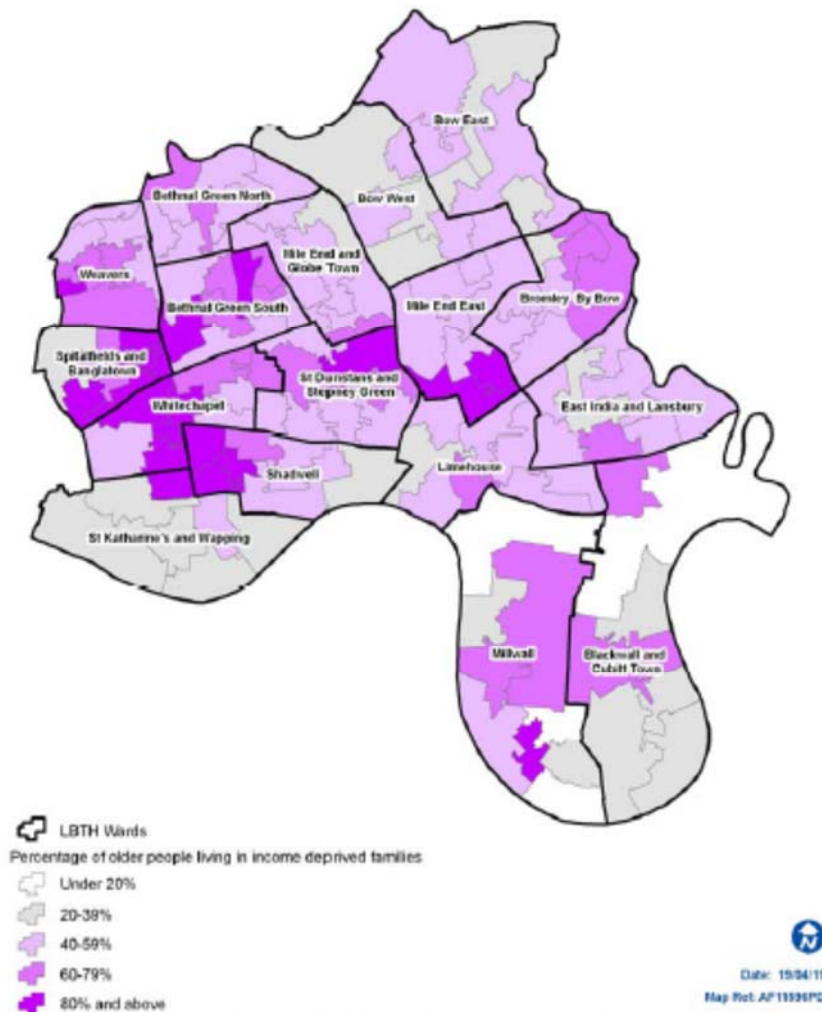


Figure 5: Percentage of older persons living in income deprived families. Source: Indices of Deprivation of Communities and Local Government, in LBTH, 2011.

2.3.4 80:20 pay ratio

Tower Hamlets has the highest pay ration between the 80th and 20th 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 resident¹). 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

¹ 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.

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
No of affordable dwelling provided	1,380	1,250	1,990	1,260	1,800

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
TOTAL	58,300	100

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.

	Market	Intermediate	Social	TOTAL
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
TOTAL	19,400	2,500	36,300	58,300

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

	Market	Intermediate	Social	TOTAL
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
TOTAL	34,100	5,600	54,600	94,300

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 2014². 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 development³.

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. 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)

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

³ LBTH SMHA, 2014

- 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 2009/10⁴. 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

⁴ ONS annual population survey

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 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	21,800	15.3	17.9	21.4

Skilled Trades and occupations				
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.

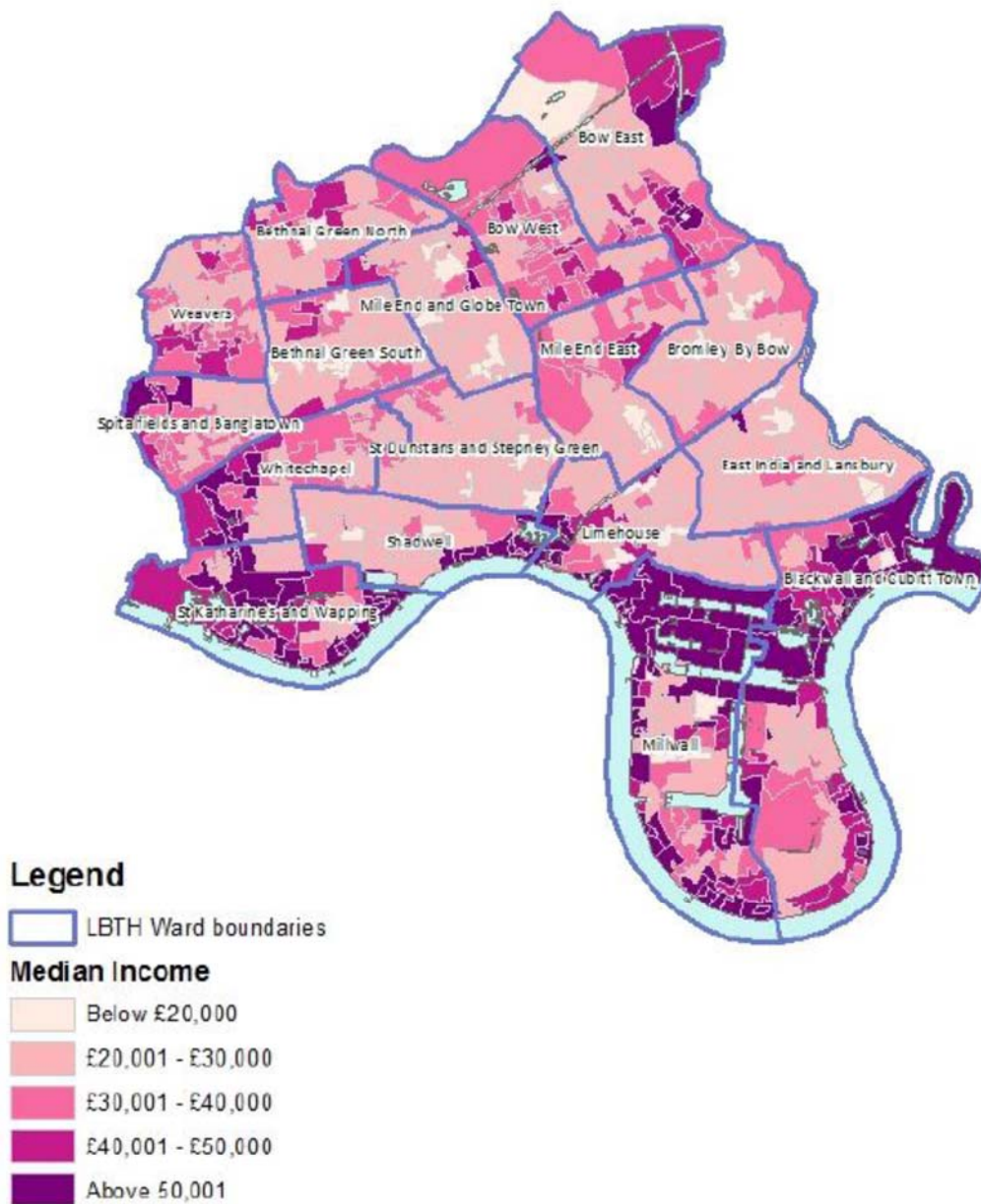


Figure 6: Median household income by area 2013. Source: CACI Paycheck, 2013 in LBTH Household Income Survey, 2013.

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/g6200/Public%20reports%20ack%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 England⁴.

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 100,00), the second highest premature

death rate from cancer (128.5 per 1000) and the second highest premature death rate (36.9 per 100,00) 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.

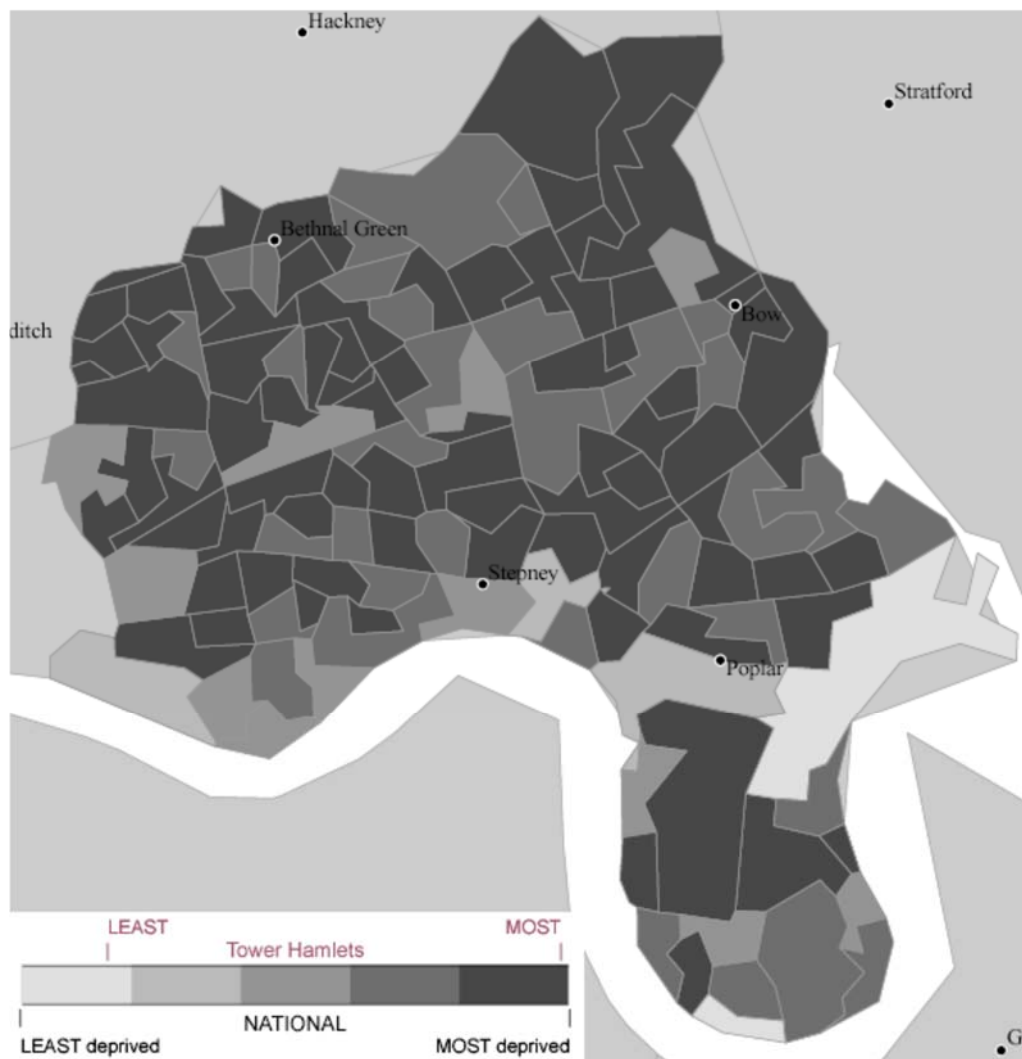


Figure 7: Geographic distribution of health and disability deprivation across Tower Hamlets. Source: Indices of Deprivation 2010 for England.

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 (CO₂), nitrogen dioxide (NO₂), 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 their quality action plan.

8.3.1 Levels of emissions

The borough exceeds air quality objectives for Oxides of Nitrogen (NO + NO₂-collectively referred to as NO_x) and particulate matter (PM₁₀). As of 2015, the Council has a duty to monitor PM_{2.5}. 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 ³ as an 8 hour mean, not to be exceeded more than 10 times a year	Yes	-	-
Nitrogen Dioxide	200 ug/m ³ as a 1 hour mean, not to be exceeded more than 18 times a year	Yes	Yes	Yes
Nitrogen Dioxide	40 ug/m ³ 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 NO_x 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 Hamlets⁵. Air quality hotspots as of 2010 were Aldgate, Limehouse and Bromley-by-Bow. There are a number of interventions to reduce sources of air pollution from transport such as encouraging more sustainable mode splits and supporting active transport and trip reduction⁶.

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.

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

⁶ 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 CO2 per resident.

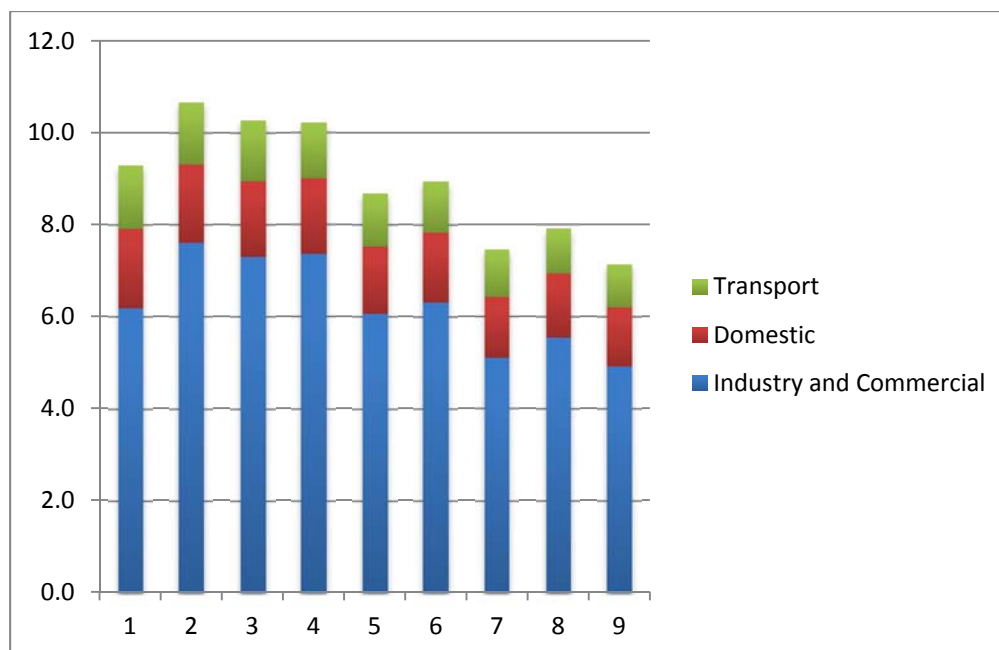


Figure 8: Per capita Local CO2 emission estimates; industry, domestic and transport sectors 2005-2013 (t CO2 per person). Source: UK local authority and regional carbon dioxide emissions national statistics: 2005-2013.

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 ⁷

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 nighttime) in most summers.

⁷ <http://climatelondon.org.uk/lccp/>

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.

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.
- CO₂ tends to dominate the direction of clean energy policy and actions. On the other hand the impacts of NO_x 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.

Mode of Journey to Work	Tower Hamlets (%)	London (%)
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.

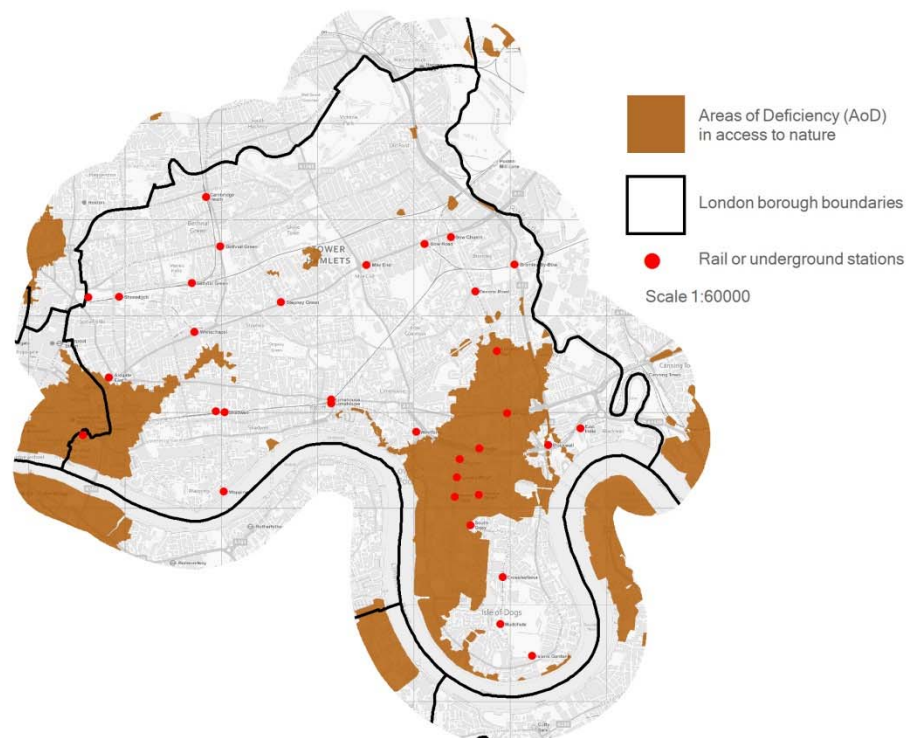
There are 46 Sites of Importance for Natural Conservation. Under the Tower Hamlets Biodiversity Action Plan, 2009, there are Habitat Action Plans for gardens and grounds; parks, squares and burial grounds; rivers and standing water; and the built environment. The Biodiversity Action Plan also identifies 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

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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.

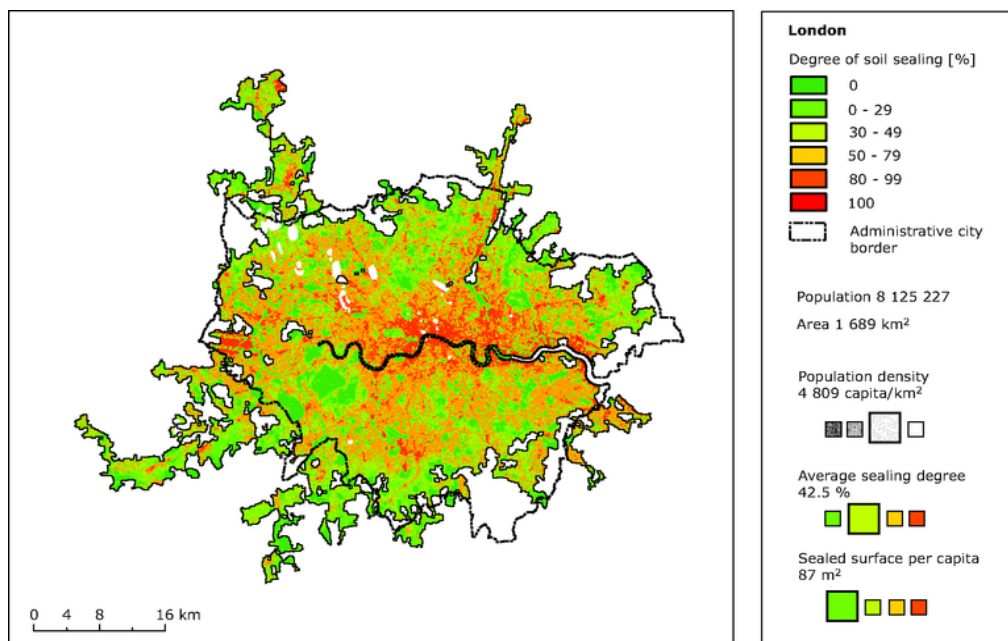


Figure: degree of soil sealing in London. Source: European Environment Agency.

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.

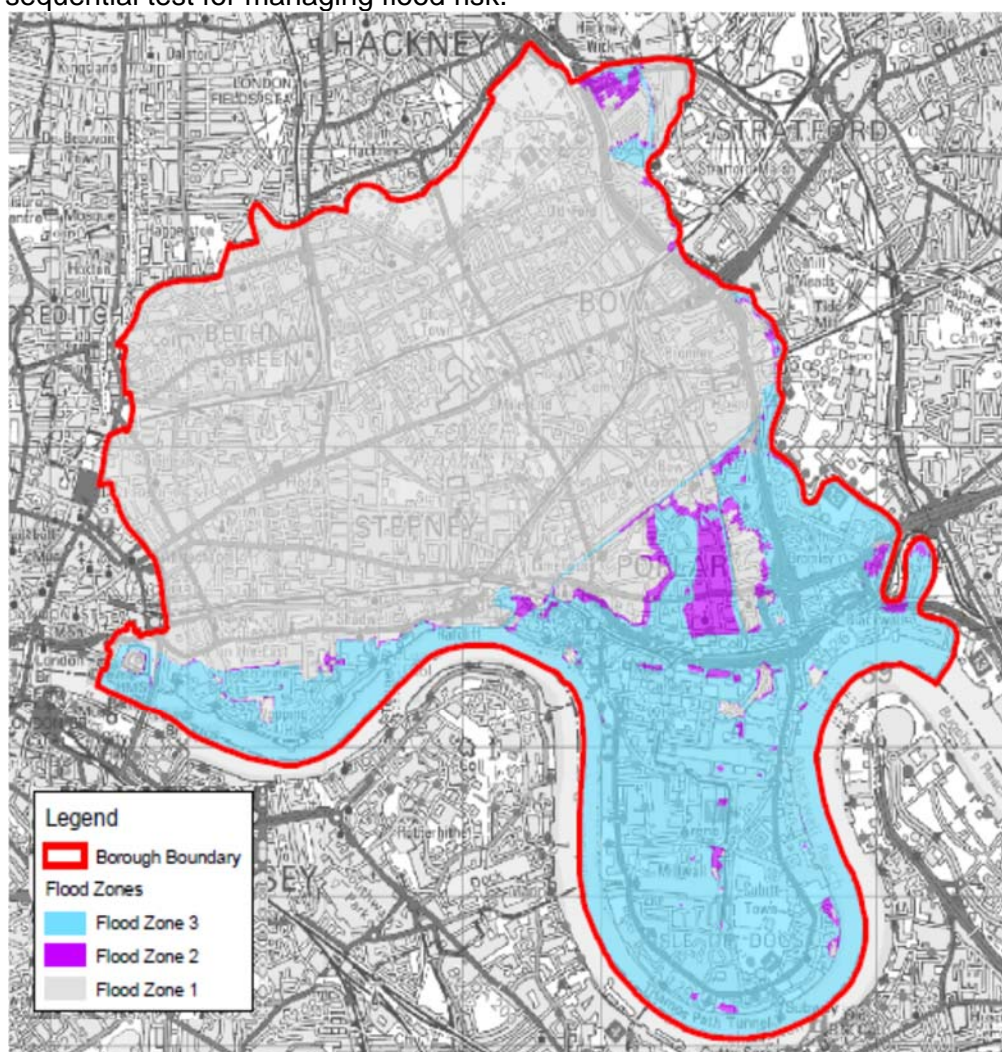


Figure 9: Tower Hamlets Strategic Flood Assessment. Source Capita Symonds for LBTH.

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 rivers 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

	2012/1 3	2013/1 4	2014/1 5
	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

	2012/1 3	2013/1 4	2014/1 5
% 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.

	Nov 10 - Oct 11	Nov 11 - Oct 12	Nov 12 - Oct 13	Nov 13 - Oct 14	Nov 14 - Oct 15	
Category	Year 1	Year 2	Year 3	Year 4	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

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:

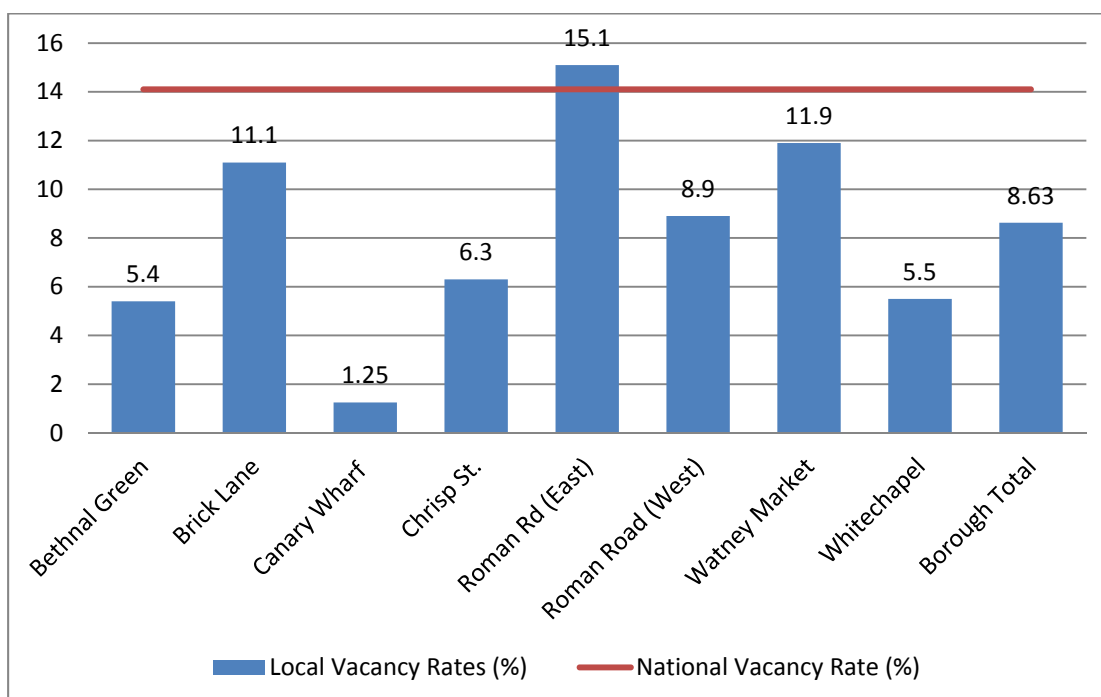


Table 16 2014/15 Town Centre Vacancy Rates. Source: LBTH Survey

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 150m² 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

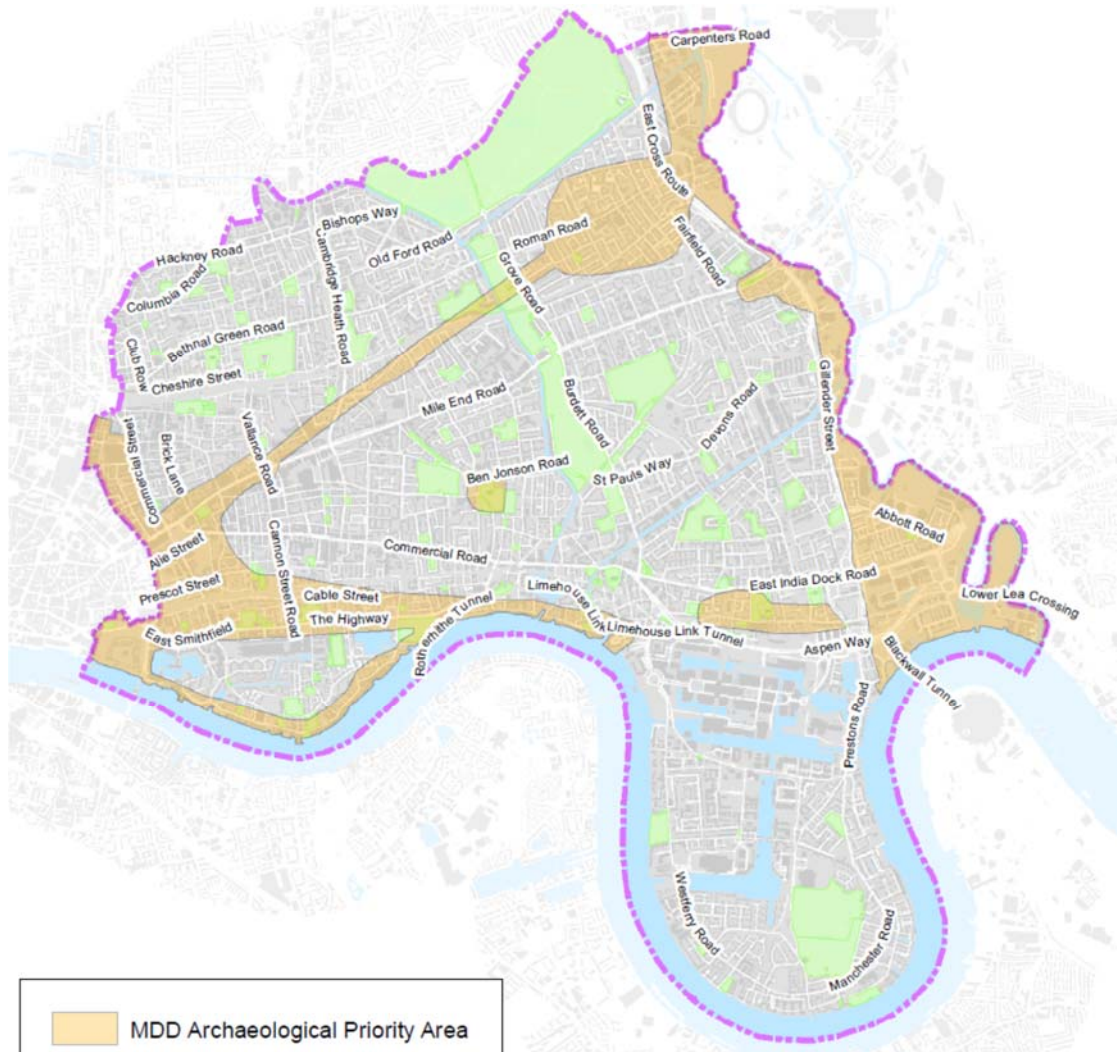
As of August 2015, there were 58 Conservation Areas within the borough. A list of these and respective character appraisals and guidelines about how the character can be conserved can be found on the LBTH Conservation website.

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: 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)
United Nations Sustainable Development Goals (2015)		
<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"> • End poverty in all its forms everywhere • End hunger, achieve food security and improved nutrition and promote sustainable agriculture • Ensure healthy lives and promote well-being for all at all ages • Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all • Ensure availability and sustainable management of water and sanitation for all • Ensure access to affordable, reliable, sustainable and modern energy for all • Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all • Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation • Reduce inequality within and among countries • Make cities and human settlements inclusive, safe, resilient and sustainable • Ensure sustainable consumption and production patterns 	<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: 11.1 By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums 11.2 By 2030, provide access to safe,</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> • Take urgent action to combat climate change and its impacts • Conserve and sustainably use the oceans, seas and marine resources for sustainable development • Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss • Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels • Strengthen the means of implementation and revitalize the global partnership for sustainable development 		<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
		<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 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>
UN Framework Convention on Climate Change (UNFCCC) (1992) and Kyoto Protocol (1997)		
<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"> • Gather and share information on greenhouse gas emissions • Launch national strategies for climate change • Co-operate in preparing for adaptation to the impacts of climate change. 	<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>

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

European Union

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
SEA Directive 2001 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment		
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.
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		
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)
European Spatial Development Perspective (1999)		
<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"> • Economic and social cohesion • Conservation of natural resources and cultural heritage • More balanced competitiveness of the European territory. 	<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>
Renewed EU Sustainable Development Strategy (2006) and 2009 review		
<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"> • Environmental protection; • Social equity and cohesion; • Economic prosperity; and • Meeting our international responsibilities. <p>The guiding principles are:</p> <ul style="list-style-type: none"> • Promotion and protection of fundamental 	<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"> • rights; • Solidarity within and between generations; • Open and democratic society; • Involvement of citizens; • Involvement of businesses and social partners; • Policy coherence and governance; • Policy integration; • Use best available knowledge; • Precautionary principle; and • Making polluters pay 	
Environment Action Plan to 2020, the 7th EAP that will be guiding European environment policy until 2020		
<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"> • to protect, conserve and enhance the Union's natural capital • to turn the Union into a resource-efficient, green, and competitive low-carbon economy • to safeguard the Union's citizens from environment-related pressures 	<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"> • better implementation of legislation • better information by improving the knowledge base • more and wiser investment for environment and climate policy • full integration of environmental requirements and considerations into other policies 	
<p>Directive 1996/62/EC: Air Quality Framework (1996) and Daughter Directives: (1999, 2000 & 2002) - New Air Quality Directive 2008/50/EC</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)
EU Water Framework Directive (2000/60/EC)		
<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"> • 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 • Promotes sustainable water use based on a long-term protection of available water resources • 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 • Ensures the progressive reduction of pollution of groundwater and prevents its further pollution • Contributes to mitigating the effects of floods and droughts 	<p>Objectives for surface waters:</p> <ul style="list-style-type: none"> • Achievement of good ecological status and good surface water chemical status by 2015 • Achievement of good ecological potential and good surface water chemical status for heavily modified water bodies and artificial water bodies • Prevention of deterioration from one status class to another • Achievement of water-related objectives and standards for protected areas <p>Objectives for groundwater:</p> <ul style="list-style-type: none"> • Achievement of good groundwater quantitative and chemical status by 2015 • Prevention of deterioration from one status class to another • Reversal of any significant and sustained upward trends in pollutant concentrations and prevent or limit input of 	<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"> Achievement of water related objectives and standards for protected areas 	
Directive 2006/118/EC on the protection of groundwater against Pollution and Deterioration		
<p>This Directive is designed to prevent and combat groundwater pollution. Its provisions include:</p> <ul style="list-style-type: none"> 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 preventing and limiting indirect discharges (after percolation through soil or subsoil) of pollutants into groundwater. 	<p>Groundwater is considered to have a good chemical status when:</p> <ul style="list-style-type: none"> 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); 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; the concentration of any other 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<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"> 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 	
Directive on the Assessment and Management of Flood Risks 2007/60/EC		
<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>	No specific targets of relevance.	<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>
The Waste Framework Directive (2008) Directive 2008/98/EC on waste		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>The aims of this directive are to:</p> <ul style="list-style-type: none"> • Provide a comprehensive and consolidated approach to the definition and management of waste. • To shift from thinking of waste as an unwanted burden to a valued resource and make Europe a recycling society. • Ensure waste prevention is the first priority of waste management. • Provide environmental criteria for certain waste systems, to establish when waste ceases to be a waste (rather than significantly amending the definition of waste). 	<p>No specific targets of relevance.</p>	<p>The SA needs to incorporate objectives that address waste issues, e.g. minimisation and re-use 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>Electricity Production from Renewable Energy Sources (2001) Directive 2001/77/EC</p> <p>Promotion of the use of energy from renewable sources (2009) Directive 2009/28/EC</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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<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>	
<p>The Landfill Directive 1999 Directive 99/31/EC on the landfill of waste</p>		
<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"> • Reduce the amount of biodegradable waste sent to landfill to 75% of the 1995 level by 2010. • Reduce this to 50% in 2013 and 35% by 2020. 	<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>
<p>EU Environmental Noise Directive (2002) Directive 2002/49/EC relating to the assessment and management of environmental noise</p>		
<p>Defines a common approach to avoid, prevent and reduce the adverse effects</p>	<p>Principles of the directive include:</p>	<p>The SA should assess the effects</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>due to the exposure to environmental noise. 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"> • Monitoring environmental problems. • Informing and consulting the public. • Addressing local noise issues. • Developing a long-term EU strategy. 	<p>of the plan on noise including from disturbance to local populations and also wildlife.</p>
<p>EU Habitats Directive (1992) Directive 92/43/EC on the conservation of natural habitats and of wild fauna and flora</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"> • Walthamstow Reservoir (SPA)

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
		<ul style="list-style-type: none"> • Epping Forest (SAC) • Lower Thames Marshes (SPA) <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>
EU Biodiversity Strategy to 2020		
<p>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.</p>	<p>No specific objectives or indicators.</p>	<p>Include SA objectives that address biodiversity.</p> <p>LP must consider biodiversity protection.</p>
EU Conservation of Wild Birds Directive 2009 Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended		
<p>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>	<p>The preservation, maintenance, and re-establishment of biotopes and habitats shall include the following measures:</p> <ul style="list-style-type: none"> • Creation of protected areas. • Upkeep and management in 	<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"> • Re-establishment of destroyed biotopes. • Creation of biotopes. 	<p>is maintained and not damaged from development.</p> <p>Avoid pollution or deterioration of habitats or any other disturbances affecting birds.</p>
Aarhus Convention (Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters) (1998)		
<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>
The Charter for the Conservation of Historic Towns and Urban Areas (International Council on Monuments and Sites, 1987)		
<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
		borough.
European Transport Policy for 2010: A Time to Decide (European Commission, 2001)		
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>
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)		
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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
Directive on Integrated Pollution Prevention and Control (96/61/EC)		
<p>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.</p>	<p>There are no specific objectives, targets or indicators of relevance.</p>	<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

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

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"> • Promoting sustainable transport. • Supporting high quality communications infrastructure. • Delivering a wide choice of high quality homes. • Requiring good design. • Promoting healthy communities. • Meeting the challenge of climate change, flooding, and coastal change. • Conserving and enhancing the historic environment. • Facilitating the use of sustainable materials. 	<ul style="list-style-type: none"> • Sustainable transport. • housing availability and quality. • good design. • health and well-being • climate change mitigation and adaption, to include minimising the risk of flooding. • conservation and enhancement of the natural environment. • conservation and enhancement of heritage assets. <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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
		<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. Recognise the wider benefits of biodiversity.</p> <p>Sustain and enhance heritage assets and put them to viable uses consistent with their conservation. 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.
Localism Act 2011		
<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"> • New freedoms and flexibilities for local government; • New rights and powers for local communities, including neighbourhood planning 	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>
UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)		
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	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"> • Sustainable consumption and production – working towards achieving more with less • Climate change and energy - confronting the greatest threat • Natural resource protection and environmental enhancement - protecting the natural resources on which we depend • From local to global - building sustainable communities - • Creating places where people want to live and work, now and in the future. <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"> • Living within environmental limits • Ensuring a strong, healthy, and just society • Achieving a sustainable economy • Promoting good governance • Using sound science responsibly <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"> • Sustainable consumption and production • Climate change and energy • Natural resource protection and environmental Enhancement • Sustainable Communities 	<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"> • Greenhouse gas emissions: Kyoto target and CO2 emissions • CO2 emissions by end user: industry, domestic, transport (excluding international aviation), other • Renewable electricity: renewable electricity generated as a percentage of total electricity • Energy supply: UK primary energy supply and gross inland energy consumption • Water resource use: total abstractions • from non-tidal surface and ground water sources • Waste: arising by (a) sector (b) method of disposal • Bird populations: bird population indices: farmland birds (b) woodland birds (c) birds of coasts and estuaries (d) wintering wetland birds • Biodiversity conservation: priority species status (b) priority habitat status • River quality: rivers of good (a) 	<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)
	biological (b) chemical quality <ul style="list-style-type: none"> Air quality and health: (a) annual levels of particles and ozone (b) days when air pollution is moderate or higher 	
Sustainable Communities: Building for the Future (ODPM, 2003)		
<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"> Sustainable communities; Step changes in housing supply; Decent homes; including the need to bring council homes up to a decent standard; and Improvements to the local environment, particularly the public realm. <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. 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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
		<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>
The Community Infrastructure Levy Regulations 2010 and amendments 2014		
<p>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.</p>	<p>No specific objectives or indicators.</p>	<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>
Urban White Paper – Our Towns and Cities: The Future (ODPM, 2000)		
<p>The Urban White Paper sets out a vision for the future of towns and cities.</p>	<p>It identifies four steps to making “all</p>	<p>SA objectives should reflect the</p>

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"> • Getting the design and quality of the urban fabric right. • Enabling all towns and cities to create and share prosperity. • Providing the quality services people need. • Equipping people to participate in developing their communities. <p>This vision of urban living includes:</p> <ul style="list-style-type: none"> • People living in attractive, well-kept towns and cities which use space and buildings well; • Good design and planning, which makes it practical to live in a more environmentally sustainable way, with less noise, pollution and traffic congestion; • Towns and cities able to create and share prosperity, investing to help all their citizens reach their full potential; and • 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. <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)
	includes targets such as: <ul style="list-style-type: none"> • Better, safer and more reliable transport systems, leading to the increased use of public transport and reductions in road congestion by 2010; • Better housing with all social housing being of a decent standard by 2010 and with most improvement taking place in deprived areas; • 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; • Better designed buildings and places; and clean and more attractive streets. 	
HOUSING		
Sustainable Communities: Homes for All (ODPM, 2005)		
This strategy sets out the Governments 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.	Targets include: <ul style="list-style-type: none"> • Maintain target that 60% of all new housing development should be built on brownfield land • Raise design standards, with the aim that a hundred more developments gain a Building for Life Award for Excellence • Improve minimum energy standards for 	SA should include objectives that support the achievement of sustainable housing provision. Local Plan principles should reflect support for improving housing supply to relevant design standards and in an energy efficient manner.

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"> • Establish a new Code for Sustainable Buildings to promote excellence in environmental performance • Raise the average energy efficiency of the whole of the residential housing stock by 20% compared with 2000. • Promote more sustainable buildings, saving energy, water and materials and helping to meet the target to cut UK carbon emissions by 60% by 2050: • Promote more sustainable, high quality design and construction, to reduce waste and improve resource efficiency. 	<p>The Local Plan should ensure adequate provision of new housing to meet future demand.</p>
The Code for Sustainable Homes: Setting the Standard in Sustainability for New Homes (2008)		
<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.</p> <p>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"> • Energy & CO2 • Emissions, • Pollution, • Water, • Heath & Wellbeing, • Materials, 	<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"> • Management, • Surface, • Water Run-off, • Ecology, and • Waste. 	
CLIMATE CHANGE		
Climate Change Act (2008)		
<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"> • To improve carbon management, helping the transition towards a low-carbon economy • 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]. 	<p>Relevant commitments within the Act are:</p> <ul style="list-style-type: none"> • 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. • A carbon budgeting system which caps emissions over five-year periods, to aid progress towards the 2050 target. • 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. • The inclusion of International aviation and shipping emissions in 	<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"> • 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). • New powers to support the creation of a Community Energy Savings Programme. 	
Stern Review of the Economics of Climate Change (2006)		
<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)
UK Carbon Plan (2011)		
<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 Plan includes the following targets:</p> <ul style="list-style-type: none"> • Commitment to reduce carbon emissions by at least 80% by 2050. 	<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>
Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report (2009)		
<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"> 1. Conserve existing biodiversity 1a Conserve protected areas and other high quality habitats 1b Conserve range and ecological variability of habitats and species 2 Reduce sources of harm not linked to climate 3 Develop ecologically resilient and varied landscapes 3a Conserve and enhance local variation within sites and habitats 3b Make space for the natural development of rivers and coasts 4 Establish ecological networks through habitat protection, restoration and creation 5 Make sound decisions based on analysis 		<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)
5a Thoroughly analyse causes of change 5b Respond to changing conservation priorities 6 Integrate adaptation and mitigation measures into conservation management, planning and practice		
The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)		
<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"> • 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”. • Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”. • 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 	<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"> • 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”. • 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”. • Business – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change”. • Local Government – “Local government plays a central role in leading and supporting local places to become more 	
ENERGY		
Energy White Paper – Planning for our electric future (DECC, 2012)		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>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.</p>	<p>15% renewable energy target by 2020 and 80% carbon reduction target by 2050.</p>	<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>
<p>Building a Greener Future: Policy Statement (DCLG, 2007)</p>		
<p>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>	<p>This Statement confirms the government's intention to achieve</p> <ul style="list-style-type: none"> • 25% more energy efficient homes by 2010, • 44% more efficient homes by 2013 and • zero carbon (net carbon emissions should be zero per annum) homes by 2016. 	<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>
<p>The Energy Efficiency Opportunity in the UK (DECC, 2012)</p>		
<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"> • Embryonic markets. 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> Information. Misaligned financial incentives. Undervaluing energy efficiency. 		the Strategy and improve the existing building stock through appropriate adaptation measures.
Energy Act 2013		
<p>The Act sets out new legislation to:</p> <ul style="list-style-type: none"> Reflect the availability of new technologies (such as CCS and emerging renewable technologies) Correspond with our changing requirements for security of supply infrastructure (such as offshore gas storage) Ensure adequate protection for the environment and the tax payer as our energy market changes. 	There are no specific targets or indicators of relevance.	<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>
UK Fuel Poverty Strategy (Department for Business, Enterprise and Regulatory Reform, 2001)		
<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>	There are no specific objectives, targets or indicators of relevance.	<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>
TRANSPORT		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
Transport White Paper – Cutting Carbon, creating growth: Making sustainable local transport happen (DfT 2011)		
<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>
The Future of Transport White Paper – A Network for 2030 (DfT, 2004)		
<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 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"> • Ensure we can benefit from mobility and access while minimising the impact on other people and the environment, now and in the future. • Get the best out of our transport system without damaging our overall quality of life. • Develop strategies that recognise that demand for travel will increase in the future. • Work towards a transport network that can meet the challenges of a growing economy and the 	<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"> Provides targets for emission reductions, now superseded by later agreements. Transport is currently responsible for about a quarter of total emissions. 	
Door to Door: A Strategy for Improving Sustainable Transport Integration (DfT, 2013)		
<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"> Accurate, accessible and reliable information about different transport options Convenient and affordable tickets Regular and straightforward connections at all stages of the journey and between different modes of transport Safe and comfortable transport facilities <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>
CONSERVATION AND BIODIVERSITY		
Wildlife and Countryside Act (1981) (as amended)		
<p>The Act still forms the basis of conservation legislation in Great Britain, although</p>	<p>The document does not contain specific</p>	<p>The SA Framework should include</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>it has been much modified.</p> <p>Schedules 5 and 8 of the Act detail lists of legally protected wild animals and plants respectively. These are updated every five years.</p>	<p>targets or indicators.</p>	<p>objectives relating to the protection and enhancement of biodiversity resources.</p> <p>The Local Plan must ensure that the requirements of the Act are complied with and that species and habitats are protected.</p>
The Conservation of Habitats and Species Regulations (2010)		
<p>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.</p> <p>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).</p>	<p>The document does not contain specific targets or indicators.</p>	<p>The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.</p> <p>It is essential that the Local Plan should consider biodiversity protection.</p>
Working with the Grain of Nature: a Biodiversity Strategy for England (March 2011)		
<p>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.</p>	<p>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</p>	<p>SA objectives should incorporate the key aims of the strategy.</p> <p>The Local Plan should help promote the vision of the strategy for towns</p>

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"> • To ensure that cities, towns and other settlements contribute fully to the goals of biodiversity conservation • To ensure that construction, planning, development and regeneration have minimal adverse impacts on biodiversity and enhance where possible • To ensure that biodiversity conservation is integral to sustainable urban communities, both in the built environment, and in parks and green spaces • 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 • Strategies, social inclusion, health and equality of opportunity • To value, further and enhance people's own contributions to 	<p>and cities and ensure that it does not impede the achievement of the five key aims for towns and cities.</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	improving biodiversity in towns and cities and to increase their access to it	
Natural Environment White Paper (2011)		
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.	There are eighteen UK biodiversity indicators grouped under six focal areas aligned to those used by the Convention on Biological Diversity: 1. Status and trends in components of biodiversity 2. Sustainable use 3. Threats to biodiversity 4. Ecosystem integrity and ecosystem goods and services 5. Status of resource transfers and use 6. Public awareness and participation	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). The Local Plan should protect the intrinsic value of nature and recognise the multiple benefits it could have for communities.
Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)		
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.	The strategy includes 22 priorities which include actions for the following sectors: • Agriculture • Forestry • Planning and Development • Water Management • Marine Management • Fisheries	Include SA objective relating to the protection and enhancement of the natural environment. The Local Plan should take into account their role in seeking to prevent the degradation of biodiversity and ecosystem services

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> • Air Pollution • Invasive Non-Native Species 	within LBTH. DPDs should also recognise their contribution to securing a net gain in biodiversity.
Safeguarding our Soils: A Strategy for England (DEFRA, 2009)		
<p>The vision is “by 2030, all England’s soils will be managed sustainability 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 sustainability 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"> • Better protection for agricultural soils. • Protecting and enhancing stores of soil carbon. • Building the resilience of soils to a changing climate. • Preventing soil pollution. • Effective soil protection during construction and development. • Dealing with our legacy of contaminated land. 	<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>
GREENSPACE		
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)		
<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"> • of at least 2ha in size, no more than 	<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)
	300m (5 minutes walk) from home; <ul style="list-style-type: none"> • at least one accessible 20ha site within 2km of home; • one accessible 100ha site within 5km of home; and • one accessible 500ha site within 10km of home; plus a minimum of 1ha of statutory Local Nature Reserves per thousand population. 	ensure that the standards are met within the borough.
HERITAGE		
Historic Environment: A Force For the Future (2001)		
<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"> • Public interest in the historic environment is matched by effective partnerships and the development of a sound base from which to develop policies. • Maximising the full potential of the historic environment as a learning resource. • 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. • The historic environment is protected and sustained for the benefit of our own and future generations. • The historic environment is an economic asset that is well harnessed. 	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)
Planning (Listed Buildings and Conservation Areas) Act 1990		
<p>The Planning (Listed Buildings and Conservation Areas) Act 1990 is an Act of Parliament of 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>
Historic Environment Good Practice Advice in Planning Notes 1,2 and 3 (Historic England, 2015)		
<p>The three guides are:</p> <ol style="list-style-type: none"> 1. The Historic Environment in Local Plans 2. Managing Significance in decision taking on the Historic Environment 3. The Setting of Heritage Assets <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>
Guidance on Tall Buildings (CABE and English Heritage 2007)		
<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)
<p>identify these.</p>		<p>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.</p>
<p>Urban White Paper – Our Towns and Cities: The Future (ODPM 2000)</p>		
<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"> • Getting the design and quality of the urban fabric right. • Enabling all towns and cities to create and share prosperity. • Providing the quality services people need. • Equipping people to participate in developing their communities. <p>This vision of urban living includes:</p> <ul style="list-style-type: none"> • People living in attractive, well-kept towns and cities which use space and buildings well; • Good design and planning, which makes it practical to live in a more environmentally sustainable way, with less noise, pollution and traffic congestion; • Towns and cities able to create and share prosperity, investing to help all their citizens reach their full potential; and • 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. 	<p>As well as targets on crime, education attainment, health and unemployment it includes targets such as:</p> <ul style="list-style-type: none"> • Better, safer and more reliable transport systems, leading to the increased use of public transport and reductions in road congestion by 2010; • Better housing with all social housing being of a decent standard by 2010 and with most improvement taking place in deprived areas; • 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; • Better designed buildings and places; and clean and more attractive streets. 	<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>
<p>AIR</p>		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (DEFRA, 2007)		
<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"> • 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. • Render polluting emissions harmless. • Sets air quality standards for 13 air pollutants. 	<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>
WATER AND FLOOD		
Water Resources Strategy for England and Wales (2009)		
<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. 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>
Future Water: The Government's Water Strategy for England (DEFRA, 2008)		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>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>	<p>The vision for 2030 is one where we, as a country have:</p> <ul style="list-style-type: none"> • “improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps; • Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water; • Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges; • Cut greenhouse gas emissions; and • Embed continuous adaptation to climate change and other pressures across the water industry and water users”. 	<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>
<p>Flood and Water Management Act (2010)</p>		
<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. 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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>management and unitary and county councils the 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.</p>		<p>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.</p>
<p>The National Flood and Coastal Erosion Risk Management Strategy for England (Environment Agency, 2011)</p>		
<p>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>	<p>The strategic aims and objectives of the Strategy are to:</p> <ul style="list-style-type: none"> • manage the risk to people and their property; • Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national; • Achieve environmental, social and economic benefits, consistent with the principles of sustainable development. 	<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>
<p>Planning Policy Guidance Flood Risk and Coastal Change (March 2014)</p>		
<p>Advises on how planning can take account of the risks associated with flooding and coastal change in plan-making and the application process.</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</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
		<p>sustainably.</p> <p>The Local Plan should seek to reduce and manage the risk of all types of flooding, using best practice guidance.</p>
<p>Thames Region Catchment Flood Management Plan, 2009</p>		
<p>The CFMP is a high-level strategic planning tool, which should be used to agree policies for sustainable floor 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"> • Flood defences cannot be built to protect everything • Climate change will be the major cause of increased flood risk in the future • The flood plain is our most important asset in managing flood • Development and urban regeneration provide a crucial opportunity to manage the risk. <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>
<p>WASTE</p>		
<p>Waste Strategy for England (DEFRA, 2007)</p>		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<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"> • Tackle the amount of waste produced, by breaking the link between economic growth and waste production. • Put waste which is produced to good use through substantial increases in re-use, recycling, composting, and recovery of energy. 	<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>
National Planning Policy for Waste 2014		
<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"> • Positive planning to deliver sustainable development and resource efficiency; • Consideration of waste management needs alongside other key spatial planning concerns such as transport and housing; • Providing a framework for stakeholder engagement; • Enabling waste to be disposed and recovered in line with the Proximity Principle; • Moving management up the Waste Hierarchy without endangering the environment or human health • Ensuring design of all developments contributes to the 	<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.	
COMMUNITIES		
The Egan Review – Skills for Sustainable Communities (2004)		
<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"> • Governance – effective and inclusive participation, representation and leadership. • Transport and connectivity – Good transport services and communications linking people to jobs, schools, health and other services. • Services – a full range of appropriate, accessible public, private community and voluntary services. • Environmental – providing places for people to live in an environmentally friendly way. • Economy – A flourishing and diverse local economy. • Housing and the Built Environment – a quality built and natural environment • Social and cultural – vibrant, harmonious and inclusive communities 	<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"> • % of population who live in wards that rank within the most deprived 10% and 25% of wards in the country. • % of residents surveyed and satisfied with their neighbourhoods as a place to live. • % of respondents surveyed who feel they ‘belong’ to the neighbourhood (or community). • Domestic burglaries per 1000 households and % detected. • % of adults surveyed who feel they can influence decisions affecting their local area. • Household energy use (gas and electricity) per household. • % people satisfied with waste recycling facilities. 	<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"> • Average no. of days where air pollution is moderate or higher for NO2, SO2, O3, CO or PM10. • % of listed building of Grade I and II* at risk of decay. • % of residents surveyed finding it easy to access key local services. • % of people of working age in employment (with BME breakdown). • Average life expectancy. • No. of primary care professionals per 100,000 population. 	
HEALTH		
Working for a Healthier Tomorrow – Dame Carol Black’s Review of the health of Britain’s working age population (2008)		
<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"> • Prevention of illness and promotion of health and well-being • Early intervention for those who develop a health condition • 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 <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"> • Life expectancy • Mortality during working age • % of the working age population being in good, fairly good or poor health • Proportion of people out of work due to sickness or disability • Sickness absence per annum • Sickness notes issued per medical 	<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"> • condition • % of working time lost due to sickness • Proportion of the working age population on incapacity benefits • Employment rate • Employment rate for disabled people • Income rates • Economic inactivity and reasons for inactivity, split into those inactive who would like to work and those seeking work • Proportion of deviation from perfect health by social class (Quality Adjusted Life Year (QALY) health measure and work status. • Proportion of adult population who smoke • Work related illness by industry • Proportion of working age population with mental health conditions • Incapacity benefits claimants by primary medical condition • Costs of working age ill health 	
<p>Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002</p>		

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"> • Flooding • Vector-borne diseases • Food-borne diseases • The effects of climate change on drinking water supplies • The direct effects of high temperatures • The air pollution climate • Exposure to ultra-violet light 	<p>A number of indicators are presented in this Report.</p> <p>They key ones include:</p> <ul style="list-style-type: none"> • Mean annual temperature • Number of days per year with daily mean exceeding 20oC • Number of days per year with daily mean below 0oC • Annual total rainfall • Seasonal rainfall • Maximum daily wind speed • Annual highest maximum daily wind speed • Annual cases of malaria 	<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>
Fair Society, Healthy Lives, The Marmot Review (2010)		
<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"> • Giving every child the best start in life • Enabling all children, young people and adults to maximize their capabilities and have control over their lives • Creating fair employment and good work for all 	<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>

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

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

Regional and Sub-Regional Level Plans

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
PLANNING		
London Plan: Spatial Development Strategy For Greater London (Consolidated with alterations since 2011) (2015)		
<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"> • A city that meets the challenges of economic and population growth. • An internationally competitive and successful city. • A city of diverse, strong, secure and accessible neighbourhoods. • A city that delights the senses. • A city that becomes a world leader in improving the environment. 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities. 	<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>	<p>aspirations, especially around housing quantify and affordability.</p>
Accessible London: Achieving an inclusive environment (GLA, 2014)		
<p>This Supplementary Planning Guidance (SPG) provides detailed advice and guidance on the policies which promote an inclusive environment in London. The SPG:</p>	<p>There are no specific targets or indicators in this document</p>	<p>SA objectives should take the Accessibility Strategy into account.</p>

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

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> • Basements policy and developments • Local food growing 		
Shaping neighbourhoods: character and context (GLA, 2014)		
<p>The objectives of this SPG are to provide:</p> <ul style="list-style-type: none"> • specific guidance on the attributes of character and context in London (physical, cultural, social, economic, perceptions and experience); • information on resources that inform an understanding of character and context in London; • an analysis of the interrelationships between different aspects of character, and how it can be articulated and presented to others; • 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. 	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>
Planning and Equality and Diversity in London (GLA, 2007)		
<p>This SPG:</p> <ul style="list-style-type: none"> • 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; • sets out some of the tools for promoting equality and diversity in planning processes; • highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination in the planning context; • sets out overarching principles and the key spatial issues for planning for equality; and 	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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> 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. 		
London View Management Framework SPG (GLA, 2012)		
<p>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</p>	<p>There are no specific targets or indicators in this document</p>	<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>
HOUSING		
London Housing Strategy (GLA, 2014)		
<p>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>	<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. The five key priorities of the Strategy are:</p> <ul style="list-style-type: none"> Increasing housing supply to 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>levels not seen since the 1930s</p> <ul style="list-style-type: none"> • Better supporting working Londoners and helping more of them into home ownership • Improving the private rented sector and promoting new purpose-built and well managed private rented housing • Pushing for a new, long-term financial settlement for London Government to drive housing delivery • Bring forward land for development and accelerating the pace of housing delivery through Housing Zones and the London Housing Bank. 	<p>that Strategy's targets can be met.</p>
Draft Interim Housing Supplementary Planning Guidance (GLA, 2015)		
<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> • intensification • town centre renewal, especially centres with good public transport accessibility • opportunity and intensification areas and growth corridors • mixed use redevelopment, especially of surplus commercial capacity and surplus public land, and particularly that with good transport accessibility • sensitive renewal of existing residential areas, especially in areas of good public transport accessibility <p>Boroughs must identify new, and review existing housing sites for inclusion in LDFs</p>		<p>The Local Plan must ensure that land use and transport links are available to ensure that Strategy’s targets can be met.</p>
AIR		
The Mayor’s Air Quality Strategy – Clearing the Air (GLA, 2010)		
<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"> • Make London a more pleasant place to live and work in; • Reduce the burden on health services in the capital; • Enhance London’s reputation as a green city – making it more attractive to tourists and businesses; and • Make London cleaner whilst safeguarding its biodiversity. 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
TRANSPORT		
The Mayor's Transport Strategy (GLA, 2010)		
<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"> • To support economic development and population growth; • Enhance the quality of life for all Londoners; • Improve the safety and security of all Londoners; • Improve transport opportunities for all Londoners; • Reduce transport's contribution to climate change, and improve its resilience; and • Support delivery of the London 2012 Olympic and Paralympic Games and its legacy <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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<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>	
The Mayor's Vision for Cycling in London (GLA, 2013)		
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"> • A tube network for the bike; • Safer streets for the bike; • More people travelling by bike; and • Better places for everyone 	<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>
Taking forward the Mayor's Transport Strategy Accessibility Implementation Plan: 2012		
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	Contains details and expected dates for projects.	Take into account strategy and project timelines within the Local Plan.

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
Mayor's Transport Strategy (MTS). The report provides greater detail about the implementation and priorities contained within the MTS Accessibility Implementation Plan.		
Travel in London (Report 4 – Transport for London) (2011)		
<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"> • Resident population, employment and deprivation. • Travel intensity, mode shares and household car ownership for residents. • Perceptions of quality of life in the Olympic boroughs. • Local air quality. • Public transport accessibility in the vicinity of the Olympic Park. 	<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>
CLIMATE CHANGE AND ENERGY		
The Mayor's Climate Change Adaptation Strategy (GLA, 2011)		
Takes a risk-based approach to understanding the climate impacts today, and how these are expected to change through the 21st century. Provides a	There are no specific targets or indicators in this document	Include objectives which seek to promote the implementation of adaptation

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>framework to identify and prioritise the key climate risks and then to identify who is best placed to deliver actions to reduce or manage these risks</p>		<p>measures to make the Borough more 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>
<p>The Mayor's Climate Change Mitigation and Energy Strategy (GLA, 2011)</p>		
<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"> • To reduce London's CO2 emissions to mitigate climate change; • To maximise economic opportunities from the transition to a low carbon capital; • To ensure a secure and reliable energy supply for London; and • To meet, and where possible, exceed national climate change and energy objectives. 	<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>Green light to clean power: The Mayor's Energy Strategy (GLA February 2004)</p>		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>The Strategy sets out the Mayor's proposals for change in the way energy is 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>	<p>Targets include:</p> <ul style="list-style-type: none"> • CO2 emission reductions of 60% from 2000 levels by 2050, • one zero-carbon scheme in each Borough by 2010, • London to generate 665GWh of electricity and 280GWh of heat, from up to 40,000 renewable energy schemes by 2010. 	<p>SA Objectives should reflect the Mayors 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>
BIODIVERSITY		
The Mayor's Biodiversity Strategy (GLA, 2002)		
<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"> • Establishing principles for the use and management of the water and land beside the River Thames; • Encourage the management, enhancement and creation of green space for biodiversity, and promote public access and appreciation of nature; • Promote the conservation and enhancement of 	<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</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>farmland biodiversity;</p> <ul style="list-style-type: none"> • Encourage greening of the built environment and the use of open space in ecologically sensitive ways; and • Encourage business to play a major role in the programme for conserving London's biodiversity. <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>	<p>adhere to the aims of the Strategy.</p> <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.</p>
London Biodiversity Action Plan (various)		
<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"> 1. acid grassland 2. chalk grassland 	<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</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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
3. heathland 4. parks & urban greenspaces 5. private gardens 6. reedbeds 7. rivers & 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	London Plan.	The Local Plan should ensure that there is no overall loss in biodiversity resources, any loss must be compensated for by land which is of equal or higher biological diversity.
ECONOMY		
The Mayor's Economic Development Strategy (GLA, 2010)		
The Strategy sets out the vision with respect to the London economy, and how it can be realised, and be compatible with this Strategy.	It includes five economic objectives: <ul style="list-style-type: none"> 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 	Include a SA objective which seeks to promote employment and the economy of the area. The Local Plan should take into account the Mayor's vision for the London economy and the objectives which underpin it.

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>creativity;</p> <ul style="list-style-type: none"> • To ensure that London has the most competitive business environment in the world; • To make London one of the world's leading low carbon capitals by 2025 and a global leader in carbon finance; • To give all Londoners the opportunity to take part in London's economic success, access sustainable employment and progress in their careers; and • 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. <p>The strategy contains no specific economic targets or indicators but refers to targets in the London Plan and other</p>	

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	supporting documents.	
Draft Central Activity Zone Supplementary Planning Guidance (2015)		
<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"> • promoting the CAZ as a competitive business location • promoting strategic clusters of culture, arts and entertainment uses/activities, • enhancing the distinct environment and heritage of the CAZ. • identifying capacity for residential development in the CAZ without compromising strategic functions • guidance on transport, movement and infrastructure including the implementation of essential new transport infrastructure schemes 	There are no specific targets and indicators in this document.	<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>
Town centres SPG (GLA, 2014)		
<p>The SPG includes guidance to:</p> <ul style="list-style-type: none"> • promote the vitality and viability of London's town centres, including neighbourhood and local centres; • support a vibrant mix of uses in town centres including retailing, leisure, culture, tourism, business, social infrastructure and housing; • accommodate growth in demand for new town centre floorspace within centres or in well integrated edge of centre sites; • bring back into use vacant or under-used properties; • promote inclusive access by public transport, shop mobility, walking and 	There are no specific targets and indicators in this document.	<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>cycling to the range of goods and services in town centres sustainable neighbourhoods with quality design and public realm, now and for the future;</p> <ul style="list-style-type: none"> • develop the sense of place and identity of town centres, making them places that people will want to visit; • implement the Strategic Outer London Development Centre concept to enhance the distinct economic strengths of these locations whilst complementing growth in other centres. 		
London Office Policy Review (GLA 2012)		
<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"> • There will be demand for new office space and for new types of formats of office space and related employment space • The rate of growth in office jobs 2011-36 is forecast to be half that prevailed over the last two decades • 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. • London's new villages and access to rapid and reliable public transport infrastructure. • 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 	<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>
SOCIAL INFRASTRUCTURE		
Social Infrastructure Supplementary Planning Guidance (GLA, 2015)		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<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"> • Planning for social infrastructure provision; • Health and social care considerations; • Education requirements; • Sports facilities; and • Faith requirements. 	<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>
Shaping neighbourhoods – play and informal recreation SPG (GLA, 2012)		
<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>
CULTURE		
The Mayor’s Cultural Strategy (GLA, 2014)		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>The Strategy sets out the Mayor’s vision for developing and promoting cultural life in London.</p> <p>Sets out the following priorities for culture:</p> <ul style="list-style-type: none"> • Maintaining London’s position as a world city for culture • Widening the reach to excellence - improve access and participation in high quality arts and cultural activities • 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. • Working on the quality of internships and apprenticeships and encouraging volunteering, pathways into the sector will be improved. • 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 	<p>It sets priorities and recommendations for how to strengthen the cultural life of Londoners.</p> <p>There are no specific targets and indicators in this document.</p>	<p>Include SA objectives which seek to 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>
HEALTH		
The London Health Inequalities Strategy (GLA, 2010)		
<p>The Strategy sets out a framework for partnership action to:</p> <ul style="list-style-type: none"> • Improve the physical health and mental well-being of all Londoners; • Reduce the gap between Londoners with best and worst health outcomes; • Create the economic, social and environmental conditions that improve quality of life for all; and • Empower individuals and communities to take control of their lives, with a particular focus on the most disadvantaged. 	<p>The key objectives of the Strategy are:</p> <ul style="list-style-type: none"> • Empowering individuals and communities to improve health and well-being; • Improve access to high quality health and social care services particularly for Londoner who have poor 	<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)
	health outcomes; <ul style="list-style-type: none"> • Reduce income inequality and the negative consequences of relative poverty; • Increase the opportunities for people to access the potential benefits of good work and meaningful activity; and • Develop and promote London as a healthy place for all. 	
NOISE		
The Mayor's Ambient Noise Strategy (2004)		
<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"> • To minimise the adverse impacts of road traffic noise; • To encourage preferential use of vehicles which are quieter in their operating conditions; • To minimise the adverse impacts of noise from freight and servicing; • To promote effective noise management on rail networks in London; • To minimise the adverse impacts of aircraft noise in London, especially at night; 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> To minimise the adverse impacts of noise on or around London's rivers and canals, while retaining working wharves and boatyards, and enhancing water space tranquillity and soundscape quality; 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; To improve noise environments in London's neighbourhoods, especially for housing, schools, hospitals and other noise-sensitive uses; To protect and enhance the tranquillity and soundscape quality of London's open spaces, green networks and public realm 		
WASTE		
The Mayor's Municipal Waste Management Strategy (GLA, 2011)		
<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"> 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; Minimise the impact of municipal waste management on our environment and reduce the carbon footprint of London's municipal waste; 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; Manage the bulk of London's municipal waste within London's boundary, through investment in new waste infrastructure. 	<p>Achieving the Mayor's net self-sufficiency targets set out in The London Plan:</p> <ul style="list-style-type: none"> To achieve zero municipal waste direct to landfill by 2025. 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. <p>To increase London's capacity to reuse or repair municipal waste from</p>	<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>approximately 6,000 tonnes a 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"> • 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"> - 545,000 tonnes of CO₂eq in 2015 - 770,000 tonnes of CO₂eq in 2020 - One million tonnes of CO₂eq in 2031 • 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. 	
<p>The Mayor's business waste strategy for London (GLA, 2011)</p>		

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>The overriding aims are to:</p> <ul style="list-style-type: none"> • focus on waste reduction and the more efficient management of resources to reduce the financial and environmental impact of waste • manage as much of London's waste within its boundaries as practicable, by taking a strategic approach to developing new capacity • boost recycling performance and energy generation to deliver environmental and economic benefits to London. 	<p>The Mayor's key targets for the management of business waste are as follows:</p> <ul style="list-style-type: none"> • achieve 70 per cent reuse, recycling and composting of C&I waste by 2020, maintaining these levels to 2031 • achieve 95 per cent reuse, recycling and composting of CDE waste by 2020, maintaining these levels to 2031. 	<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>
WATER		
The Mayor's Water Strategy – Securing London's Water Future (GLA, 2011)		
<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"> • To use the water London already has more effectively and efficiently; • To minimise the release of untreated wastewater and diffuse pollution into the water environment; • To manage, and where possible reduce, the threat of flooding to people and their property; and • To reduce the greenhouse gas emissions produced from supplying water and treating wastewater. 	<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</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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>125 l/p/d.</p> <p>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.</p>	
OPEN SPACE AND LANDSCAPE		
London Plan - All London Green Grid Supplementary Planning Document and Area Framework for Lee Valley and Finchley Ridge (GLA, 2012)		
<p>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</p>	<p>There are no specific targets or indicators in this document</p>	<p>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.</p>
London's Natural Signature and Lea River Valley Natural Landscape Area (January 2011)		
<p>Since a lack of widespread awareness of the underlying nature of London has</p>	<p>There are no specific targets or</p>	<p>The SA Framework should include</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>been a major cause of the gradual erosion of London's natural character – 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</p>	<p>indicators in this document</p>	<p>objectives relating to preserving the quality of the natural environment and Natural Landscape Areas.</p> <p>The Local Plan should ensure the natural character of the area is preserved and enhanced.</p>
<p>The canopy – London's Urban Forest – A guide for designers, planners and developers (2011)</p>		
<p>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.</p>	<p>There are no specific targets or indicators in this document</p>	<p>Include an SA Objective regarding improving addressing the impacts of climate change.</p> <p>Local Plan should recognise the benefits trees can create for city environments including retention and net increase, and policies should address these issues.</p>
<p>RIVERS AND CATCHMENTS</p>		
<p>River Basin Management Plan, Thames River Basin District (2009 update imminent)</p>		
<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</p>	<ul style="list-style-type: none"> By 2015, 22% of surface waters (rivers, lakes, estuaries and coastal waters) are going to improve for at least one biological, chemical 	<p>The SA Framework should include objectives that consider effects upon water quality and water resources.</p> <p>The Local Plan should consider how the</p>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
<p>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>	<p>or physical element.</p> <ul style="list-style-type: none"> • 25% of surface waters will be at good or better ecological status. • 17% of groundwater bodies will be at good overall status by 2015. • At least 30% of assessed surface waters will be at good or better biological quality by 2015. 	<p>water environment can be protected and enhanced.</p>
Thames Estuary 2100 Action Plan: Managing Flood Risk Through London and the Thames Estuary (EA, 2012)		
<p>Include SEA objectives relating to the provision of new/retention of existing social infrastructure.</p>	<p>For the first 25 years (2010-2035), the Strategy seeks to:</p> <ul style="list-style-type: none"> • Continue to maintain the current flood defence system – including planned improvements; • Ensure that effective floodplain management (emergency and spatial planning) is in place across the estuary; • Safeguard areas that will be required for future changes to the flood defences; • Monitor change indicators including sea level rise and 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)	
	climate change and review the Plan as required.		
Thames Catchment Flood Management Plan (EA, 2009)			
<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>	There are no specific targets or indicators in this document	<p>The SA Framework should include objectives that promote reduction and management of flood risk.</p> <p>The Local Plan should consider how sustainable approaches to managing flood risk can be incorporated.</p>	
HERITAGE			

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
Archaeology and Planning in Greater London: A charter for Greater London Archaeology Advisory Service (2011)		
<p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> • Scheduled Ancient Monuments • Archaeological Priority Zones • Locally Important Remains • National Important Remains 	<p>The SA Framework should include an objective around protecting archaeological heritage.</p> <p>The Local Plan should include policies that relate to archaeological protection, including sufficient archaeological investigations as part of the planning process.</p>
Olympic Legacy Supplementary Planning Guidance (2012)		
<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"> • Homes and communities • Business and employment • Connectivity and transport • Urban form • Open space and sustainable development. 	<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"> • Creating a coherent and high quality city within a world city region • Improving educational attainment, skills and raising aspirations • Reducing worklessness, benefit dependency and child 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for Sustainability Appraisal (SA) and Local Plan (LP)
	<p>poverty.</p> <ul style="list-style-type: none"> • Homes for all • Enhancing health and wellbeing • Reducing serious crime rates and anti-social behaviour • Maximising sports legacy and increasing participation. <p>Targets align with those of the London Plan.</p>	

London Borough of Tower Hamlets Policy

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
PLANNING AND STRATEGY		
Tower Hamlets Core Strategy & Managing Development Plan Document 2025 (adopted 2010)		
<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,</p>	<ul style="list-style-type: none"> • Strategic target for affordable homes of 50% until 2025. • 35%-50% affordable homes on sites providing 10 new residential units or more (subject to viability). • An overall strategic tenure split for affordable homes 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<p>and does not solely relate to development decisions.</p> <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>	<p>from new development as 70% social rented and 30% intermediate.</p> <ul style="list-style-type: none"> • 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. 	<p>The objectives and guidance within the Local Plan should update the Core Strategy and DPD.</p>
<p>Tower Hamlets Community Plan to 2020 (2015)</p>		
<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"> • A great place to live; • A prosperous and fair community; • A safe and cohesive community; and • A healthy and supportive community. <p>There are 4 new cross cutting priorities:</p> <ul style="list-style-type: none"> • Empowering residents and building resilience • Promoting healthier lives • Increasing employment • Responding to population growth 	<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>
<p>TRANSPORT AND MOBILITY</p>		

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
Tower Hamlets Local Implementation Plan 2 2011-2031 (2011)		
<p>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>	<p>LIP2 contains nine transport objectives for the Borough:</p> <ul style="list-style-type: none"> • To promote a transport environment that encourages sustainable travel choices for all; • To ensure the transport system is safe and secure for all in the borough; • To ensure the transport system is efficient and reliable in meeting the present and future needs of the borough's population and economy; • To reduce the impact of transport on the environment and wellbeing; • To ensure transport is accessible for all; • To encourage smarter travel behaviour; • To better integrate land use and transport planning policy and programmes; • To protect, celebrate and improve sustainable access to the borough's cultural, historical and heritage assets to enhance local distinctiveness, character and townscape views; and • To maximise the benefits and opportunities offered by the London 2012 Games and its legacy. <p>These objectives contribute to the overall transport vision for Tower Hamlets and are supported by a delivery plan and programme for investment.</p>	<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>
The Cycling Plan for Tower Hamlets (2015)		
<p>The Cycling Plan aims to promote the use of bicycles as an</p>	<p>The Plan is underpinned by 32 pledges and four targets:</p>	<p>Include a SA objective which seeks to</p>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
effective and enjoyable means of transport and reduce the need to travel by car.	<ul style="list-style-type: none"> • Double the volume of cyclists in the borough • Increase the proportion of residents cycling to work to 15% • Reduce the risk of cyclist accidents by half • Double the number of children cycling to school 	<p>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>
Tower Hamlets Walking Plan 2011-2021 (2011)		
<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"> 1. Enhance the Walking Network 2. Improve Pedestrian Safety and Security. 3. Integrate Walking Across Policy Areas. 4. Promote Walking to the Community. <p>These objectives are further detailed with steps and priorities to meets 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>
HEALTH AND WELLBEING		
Tower Hamlets Joint Strategic Needs Assessment (2015)		
<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>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
Tower Hamlets Health and Wellbeing Strategy 2006 – 2016 (Refresh approved 2012)		
<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"> • Reduce inequalities in health and wellbeing • Improve the experience of people who use our services • Develop excellent integrated and more localised services • Promoting independence, choice and control • Invest resources effectively <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>
Mental Health Strategy 2014 – 2019 (2014)		
<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>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
COMMUNITY		
Tower Hamlets Community Safety Plan 2013 -16 (2014)		
<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>To make Tower Hamlets a Safe and Cohesive Community the Partnership focus on achieving the following objectives:</p> <ul style="list-style-type: none"> • Gangs and Serious Youth Violence • Anti-Social Behaviour (ASB) and Arson • Drugs and Alcohol • Violence (including Domestic Violence and Violence against Women and Girls) • Prostitution • Hate Crime and Community Cohesion • Killed or Seriously Injured on our roads • Property/Serious Acquisitive Crime • Public Confidence and Satisfaction • Reducing Re-offending • MOPAC 7 (Mayor's Office of Policing and Crime priority neighbourhood crimes) 	<p>Indicators included within this plan include:</p> <ul style="list-style-type: none"> • Number of Arson incidents (all deliberate Fires) • Number of Deliberate Fires (Deliberate) • Number of Grass/open land fires – deliberate and unknown • Number of Rubbish Fires – deliberate and unknown • Number of 'Most serious violence' offences • Number of Gun Crimes and Gun Crime • Number of Knife Crimes and Knife crime • Number of Assaults with Injury • Number of Serious Acquisitive Crimes • Number of Personal Robberies • Number of Commercial Robberies • Total Robbery numbers • Number of Residential Burglaries • Number of thefts of Motor Vehicles • Number of thefts From Motor Vehicles • Number of Serious Youth Violence and Youth Violence offences • Rate of proven re-offending by young offenders • Number of domestic Violence Offences • Domestic Violence Rate • Domestic Offence Arrest Rate • Number of rapes • Number of other Serious Sexual Offences • Number of repeat incidents of domestic violence 	<p>The SA Framework should include objectives that complement this plan.</p> <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>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
	<ul style="list-style-type: none"> • Number of drug intervention programme referrals that re-offend • Number of drug users recorded as being in effective treatment • Perception of drug use or drug dealing as a problem • Offenders under probation supervision living in settled and suitable accommodation at the end of their order or licence • Drug intervention programme referrals that re-offend • Offenders under probation supervision in employment at the end of their order or license • Rate of proven re-offending by adults under probation supervision • Adult re-offending rates for those under probation supervision • Racist Offences • Homophobic Offences • % of people who believe people from different backgrounds get on well together in their local area 	
<p>Statement of Community Involvement Tower Hamlets (2009)</p>		
<p>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.</p>	<p>There are no specific targets or indicators in the statement.</p>	<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>
<p>HOUSING</p>		

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
Tower Hamlets Strategic Housing Market and Needs Assessment (2009) NB 2015 draft awaited		
<p>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:</p> <ul style="list-style-type: none"> • Ascertain the nature and level of current housing demand and need in the Borough. • Obtain an understanding of the likely characteristics of the future housing market. • Estimate the future number of households requiring market and affordable housing. • Inform policies aimed at providing the right mix of housing in the future – both market and affordable, including the size of affordable housing required. • Understand the housing requirements of particular groups. • Inform the Council's Local Development Framework which will set out their spatial planning strategies. • Inform policy making and investment decisions locally and regionally. <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</p>	<p>Targets include:</p> <ul style="list-style-type: none"> • National annual target is for at least 60 per cent of new housing to be provided on previously developed land. 	<p>This document provides contextual data which should be considered in the SA baseline.</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>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
representatives.		
Tower Hamlets Housing Strategy 2009-2012 (2009) (NB Current strategy is also contained in the below statements*)		
<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> <ul style="list-style-type: none"> • Delivering and Managing Decent Homes • Placemaking and Sustainable Communities • Managing Demand, Reducing Overcrowding • New Housing Supply 	<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 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>	<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>
*Tower Hamlets Homelessness Statement 2013 -17(2013)		
<p>4 central themes to form the basis of the 2013-17 strategy:</p> <ul style="list-style-type: none"> • Homeless prevention and tackling the causes of homelessness; • Access to affordable housing options; 	There are no specific targets or indicators of relevance.	The SA Framework should include objectives that address housing issues including homelessness.

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> • Children, families and young people; and • Vulnerable adults. 		<p>The Local Plan should recognise the causes of homelessness and contribute to its prevention where possible (however its contribution may be limited).</p>
<p>*Older People’s Housing Statement 2013 -2015 (2013)</p>		
<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>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>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<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' Continue to provide flexible, well procured, affordable services for residents.</p>		
<p>*Overcrowding and Under occupation Statement 2013 – 2015 (2013)</p>		
<p>The three strategic aims for tackling and reducing overcrowding are;</p> <ul style="list-style-type: none"> • Reduce overcrowding in existing housing stock, and put in place preventative measures to reduce future overcrowding • Continue to increase the overall supply of housing for local people including a range of affordable, family housing • 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. <p>There are four sets of actions:</p> <ul style="list-style-type: none"> • Property based actions • Lettings based actions • Advice and partnership based actions 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> Under occupation based actions. 		
BIODIVERSITY		
Tower Hamlets Local Biodiversity Action Plan 2014-19 (2014)		
<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; gardens and grounds; rivers and standing water; and parks, squares and burial grounds.</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 biodiversity.</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>
WATER AND FLOOD		
Tower Hamlets Surface Water Management Plan (2011)		
<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</p>	<p>The SWMP recommended the inclusion of the following policies to reduce flood risk:</p> <p>Policy 1: <i>All developments across the borough (excluding minor house extensions less than 250m²) 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</i></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>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"> • 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. • Identify, define and prioritise Critical Drainage Areas, including further definition of existing local flood risk zones and mapping new areas of potential flood risk. • 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 • 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 working opportunities • Undertake engagement with stakeholders to raise awareness of surface water flooding, identify flood risks and assets, and agree mitigation measures and actions • 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 • Meet borough specific objectives as recorded at the outset of the development of the SWMP. 	<p><i>runoff discharging from the site.</i></p> <p>Policy 2: <i>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) 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 IoH124₁) are used.</i></p> <p>Policy 3: <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>	

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> 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 		
Tower Hamlets Local Flood Risk Management Strategy (2015 Consultation Draft)		
<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>
AIR AND LAND QUALITY		
Tower Hamlets Clean Air Zone Plan 2010 – 2015 (2010)		
<p>The Clear Zone covers an area of approximately 9km² 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>The following Clear Zones Measures are included</p> <ul style="list-style-type: none"> CZ2a Walking Corridor 1 CZ2b Walking Corridor 2 CZ3 Cyclist Crossing Priorities CZ4 Signage 	<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</p>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<p>Implement a phased package of sustainable transport interventions to improve the environment within the Clear Zone</p> <p>1) Reduce air pollution from transport sources to improve air quality in the Aldgate area and across the Clear Zone;</p> <p>2) Improve the urban realm and management of the road network to ensure better connections and increased accessibility within the Clear Zone;</p> <p>3) Reduce noise pollution from transport sources;</p> <p>4) Reduce greenhouse gas emissions from transport sources to help tackle climate change; and</p> <p>5) Ensure future development within the Clear Zone contributes to achieving the Council's Clear Zone objectives.</p>	<p>CZ5 Urban Design Guide</p> <p>CZ6 Emissions based P&D parking</p> <p>CZ7 Traffic Reduction Tools</p> <p>CZ8 Road Hierarchy</p> <p>CZ9 Awareness Campaigns</p> <p>CZ10 Electric Vehicle Charging Infrastructure</p> <p>CZ11 Electric Vehicle Car Clubs</p> <p>CZ12 Local LEZ</p> <p>CZ13 Low energy street lighting</p> <p>CZ14 No Idling Zone</p> <p>CZ15 d-NOx Paving</p> <p>CZ16 Out of hours operation</p> <p>CZ17 Freight Mapping</p> <p>CZ18 Drop Box Scheme</p> <p>CZ19 Consolidation Centre/s</p> <p>CZ20 Supplementary Planning Guidance</p> <p>CZ21 Construction Logistics Plans</p> <p>CZ22 Delivery and Servicing Plans</p> <p>CZ23 Travel Plan Toolkit</p> <p>CZ24 Travel Assessment Toolkit</p>	<p>Clean Air Zone, for that area of the borough.</p>
<p>Tower Hamlets Air Quality Action Plan (LBTH) (2003)</p>		

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<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"> • Monitor air quality to measure the success of our actions over time. • 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. • Actively support and take part in the London wide Vehicle Emissions Testing Scheme. • Use controlled parking mini-zones to target congested parking around tube stations and bordering the Central London Charging Zone. • Implement a comprehensive streetscene programme to improve the street 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. • Lead by example by using a fleet of elective vans for Pest Control within Environmental Health, Environmental Protection Division. • Develop Supplementary Planning Guidance for Planning Applications, requiring submission and approval of air quality assessments for major developments before development can commence. • Support and facilitate the development of major transport infrastructure improvements projects in the borough including Crossrail and the two to three car 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
	expansion of the Docklands Light Railway. <ul style="list-style-type: none"> • Support the development and implementation of a Low Emissions Zone for London. • Establish a Council Vehicle Register with a full emissions inventory for Council and Contractors' vehicles together with an emissions improvement programme. 	
Tower Hamlets Contaminated Land Strategy (2013)		
<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"> • To comply with the requirements of Part 2a of the Environmental Protection Act (1990); • To ensure the effects of historic and present contamination are not causing significant risks to human health and/or the environment; • To encourage redevelopment of brownfield sites in accordance with government objectives and strategy; • To complement the planning control system that ensures that risks associated with contamination on a site are appropriately dealt with during redevelopment; • To provide information and respond to requests from the public, businesses and community organisations with increased efficiency and accuracy; • To provide accurate information to the Environment 	<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>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<p>Agency for its National Report on contaminated land;</p> <ul style="list-style-type: none"> To compile accurate and up to date information on land contamination in a central location; To facilitate and encourage information exchange between council departments and regulatory authorities thereby minimising duplication of work; and To protect historic sites and the historic environment, especially 'designated historic sites' and areas of local importance. 		
WASTE		
Tower Hamlets Municipal Waste Management Strategy 2003-2018 (2003)		
<p>The Strategy outlines the waste handling arrangements in the Borough.</p>	<p>The Strategy is underpinned by the principles of the waste hierarchy by proposing to:</p> <ul style="list-style-type: none"> Reduce the amount of waste generated; Enhance the re-use of unwanted articles; Provide recycling and composting services; Recover energy from residual waste; Minimise waste going to landfill; and Transfer waste out of the Borough by river via the Northumberland Wharf Waste Transfer Station. 	<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>
CONSERVATION		
A Conservation Strategy For Tower Hamlets (2010)		
<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</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</p>	<p>The SA Framework should include objectives that seek to protect heritage assets.</p>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<p>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>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"> • Understanding the significance of the heritage; • Increasing community pride, ownership and involvement in heritage to promote community cohesion; • Ensuring effective governance and management of the heritage; • Increasing heritage’s contribution to regeneration; • Improving the condition of the heritage; and • Ensuring effective protection of the heritage. 	<p>The Plan should seek to protect heritage assets within the plan area.</p>
OPEN SPACE		
Tower Hamlets Open Space Strategy 2006-2016 (2011 mid-point review and update)		
<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"> • To improve the overall quality of current provision of open space within the Borough by having no poor quality sites • 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 • To improve accessibility to existing and new 	<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)
	<p>open spaces</p> <ul style="list-style-type: none"> To prioritise public safety in parks To maximise funding opportunities in order to support the action plan 	
<p>Tower Hamlets Green Grid Strategy (2010)</p>		
<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"> Retain all existing open spaces and walking routes; Enhance the quality of existing open spaces; Create new publicly accessible open spaces; Connect open spaces to local communities with enhanced and new walking routes; and Manage the Green Grid to a high standard. 	<p>The Strategy’s targets are:</p> <ul style="list-style-type: none"> No net loss of existing publicly accessible open space through development. No net loss of walking routes through development. 100% of Green Grid Open Spaces enhanced through measures to improve accessibility, safety, attractiveness, functionality as appropriate. Significant increase in currently restricted or partially restricted existing open space made publicly accessible and managed. Increase in new publicly accessible open space created, managed and protected. Significant length of Green Grid network enhanced through measures to improve safety, accessibility and attractiveness as appropriate. 100% of the Green Grid network and Green Grid Open Spaces with approved and resourced management plans. 	<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>
<p>POVERTY AND EXCLUSION</p>		
<p>Tower Hamlets Fuel Poverty Strategy and Action Plan: Providing Energy Efficiency and Affordability for All 2013-2016 (2013)</p>		

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<p>Aims:</p> <ul style="list-style-type: none"> 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. 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. To Empower, Educate and Inform the resident about how to achieve Affordable Warmth Actively seek and access funding to deliver energy efficiency projects Promote Good practice demonstrations and deliver innovative pilot projects 	<p>There are no specific targets or indicators within the plan.</p>	<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>
Child Poverty Approach 2013 – 2015 (2013)		
<p>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.</p> <p>Four themes have been central to shaping our approach to child poverty locally:</p> <ul style="list-style-type: none"> Removing barriers to work Developing pathways to success Breaking the cycle of poverty Mitigating the effects of poverty 	<p>There are no specific targets or indicators within the plan.</p>	<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>
ECONOMY AND EMPLOYMENT		

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
Employment Strategy (2011) To be replaced by the Economic Growth Strategy		
<p>The aim is to achieve convergence with the London employment rate over time through five strategic objectives:</p> <ol style="list-style-type: none"> 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 	<p>The overarching aim of the strategy is to achieve convergence with the London employment rate over time</p>	<p>Include SA objective to increase employment, especially for groups who are disproportionately unemployed.</p> <p>The Local Plan should take into account the need to increase employment rates in the borough.</p>
Enterprise Strategy (2011) To be replaced by the Economic Growth Strategy		
<p>The strategic aim is to encourage and support enterprise and entrepreneurial activity to increase opportunity, prosperity and mobility in Tower Hamlets.</p> <p>The six strategic objectives are:</p> <p>SO1 – A part of the Central London Economy: positioning Tower Hamlets as the borough to do business</p> <p>SO2 – New business : supporting enterprise start-ups and growth</p> <p>SO3 – Spreading the benefits of growth: developing a partnership with and between big businesses</p> <p>SO4 – A changing economy: growing emerging sectors</p>	<p>There are no specific targets or indicators within the plan</p>	<p>Include SA objective to promote economic growth and enterprise in the borough.</p> <p>The Local Plan should seek to encourage business growth and enterprise.</p>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
SO5 – A pioneering borough: fostering an entrepreneurial and innovation culture SO6 – A ‘place’ for business: ensuring Tower Hamlets has the right spaces and places to support a diverse, thriving economy		
COMMUNITY FACILITIES		
Idea Store Strategy (2009)		
Strategic Objectives: <ul style="list-style-type: none"> • Improve the quality of core library and information services provided by Idea Stores and Libraries • Improve the quality and scope of core adult learning services • Expand the provision of high quality health information, advice and support in Idea Stores and Libraries • Expand the provision of high quality employment information, advice and support • Improve the provision of high quality, accessible ICT and ILT infrastructure, services, training and support in Idea Stores and Libraries • Strengthen inclusion and accessibility • Co-locate cultural, leisure and other council services where this will increase efficiency, effectiveness and value for money 	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. Potential areas for future Idea Stores include Bethnal Green, Bromley by Bow and Crossharbour.	Include SA objective to promote community facilities. The Local Plan should seek to meet the needs for Libraries and Idea Stores identified in the strategy, through policy and site allocations.
Leisure Facilities Strategy 2009 – 2019 (2009)		
Strategic Objectives:	There are no specific targets or indicators	Include SA objective to promote

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> Address gaps in provision and provide facilities in areas of low participation Generate energy and economic efficiencies Improve the quality and suitability of leisure facilities <p>The strategy provides an evidence base of current and future need for leisure facilities in the borough.</p>		<p>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>
CLIMATE CHANGE		
Carbon Management Plan 2009 - 2020 (Updated 2013)		
<p>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</p>	<p>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)</p>	<p>Include SA objective to reduce local carbon use.</p> <p>The Local Plan should seek to contribute towards the Council's ambition to be a low Carbon Council.</p>
PEOPLE		
Supporting People Strategy 2011 – 2016 (2011)		
<p>Sets out how the Council will support the needs of vulnerable people through housing support services.</p> <p>Objectives:</p> <ul style="list-style-type: none"> Supporting individuals to live as independently as possible Rebalancing services towards prevention and early intervention away from high cost less empowering longer term services; Expanding our commitment to personalised services; and 	<p>There are no specific targets or indicators</p>	<p>Include SA Objective on meeting varied housing needs, including of vulnerable people.</p> <p>The Local Plan should contribute towards meeting the needs of vulnerable people, as identified in this strategy.</p>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
<ul style="list-style-type: none"> Driving up efficiency and effectiveness in the use of resources 		
Children and Families Plan 2012 – 2015 (2012)		
<p>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.</p> <p>Key themes are:</p> <ul style="list-style-type: none"> 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 Prevention from harm: Safeguarding all children across all partner agencies remains a top priority 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 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 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. 	<p>There are no specific targets or indicators</p>	<p>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.</p> <p>The Local Plan should take into account the needs of young people and families, as identified in this plan.</p>

Summary and Objectives	Key Targets and Indicators	Implications for the Sustainability Appraisal (SA) and Local Plan (LP)
Planning for School Places 2015 (Updated Annually)		
Provides the annual review of school places.	<p>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.</p> <p>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.</p>	<p>Include SA objective to meet the need for sufficient school places.</p> <p>The Local plan should meet the needs identified in the strategy, through policy and site allocations.</p>

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"> Reduce poverty and social exclusion? Promote social cohesion and integration? Promote equity between population groups? Reduce fuel poverty? 	<ul style="list-style-type: none"> Improve the borough's relative ranking for indices of multiple deprivations (IMD). Reduce the percentage of children living in income deprived households. Reduce the percentage of older persons (aged 65 and over) living in income deprived households. Reduce the number of households in fuel poverty. Increase the percentage of residents who feel that people from different backgrounds get along. 	++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.		
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	Will the Strategy/Policy... <ul style="list-style-type: none"> 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 Ensure appropriate infrastructure is delivered alongside 	<ul style="list-style-type: none"> Increase the number of school places including places for child care and early education, in line with pupil place projections. Provide increases in infrastructure in line with the Leisure Strategy, Idea Store Strategy and Open Space Strategy. Increase the number and quality of play spaces Improve the number of residents who consider 	++ 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.		
			+ 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		

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	development, including transport and utilities. <ul style="list-style-type: none"> Promote high quality public realm? Reduce the impacts of noise, vibration and pollution on public realm? Reduce opportunities to commit crime and anti-social behaviour? Improve perceptions of safety and reduce the fear of crime? 	Tower Hamlets a good place to live. <ul style="list-style-type: none"> Reduce rate of noise complaints Reduce crowding on rail services reduce 'excess wait time' on buses reduce traffic delay Reduce the crime rates per 1,000 people. Reduce in the proportion of people who perceive crime as a top personal concern 	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. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	Will the Strategy/Policy... <ul style="list-style-type: none"> Protect and enhance access to an adequate level of provision of health / leisure / community/ open space facilities? Improve mental and physical health and wellbeing? 	<ul style="list-style-type: none"> Increase healthy life expectancy. Increase proportion of children who achieve a good standard of development 	++ Site includes provision of a new health facility that will serve the wider community.		
			+ Site safeguards an existing health facility.		

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

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"> • Improve connectivity both within the borough and to neighbouring boroughs and wider London? • Encourage a shift to more sustainable forms of travel and away from private vehicle use? • Link new development with sustainable transport provision? • Increase transport efficiency? • Improve safety of the transport network? • Improve accessibility of the transport network? • Enhance capacity of the transport network? 	<ul style="list-style-type: none"> • Increase cycling network and support to increase share of all trips made by bicycle. • Enhance mode split in favour of active transport, and secondly public transport. • Meet Mayor of London's Transport Plan targets for mode split. • Reduction in the vehicle (miles / km) travelled per person per year? • Mode Share Increase the percentage of journeys made by means other than the car. • Reduce the percentage of Principal Road Network where maintenance should be considered. • Reduce the number of persons killed and seriously injured on roads within the borough. • Reduce the total number of casualties from road traffic accidents within the borough. • Reduce CO2 emissions from ground based transport. • Reduce crowding on rail services • reduce 'excess wait time' on buses • reduce traffic delay 	++ Site lies within PTAL 5 or 6a/b		
			+ 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:					
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"> • Improve opportunities and facilities for formal, informal and vocational learning for all ages? • Support the Local Authority to fulfil its statutory duties for provision of school places and childcare places? • Contribute to upskilling and meeting the skills gap? 	<ul style="list-style-type: none"> • Increase the number of school places, in line with pupil place projections. • Increase the number of early education and child care places in line with population projections • Reduce the proportion of 16-18 years olds not in education, employment or training. • Increase the proportion of residents who attain an NVQ Level Four or higher. • Reduce current deprivation score for education and skills. • Reduce the proportion of residents with no qualifications. 	++ 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"> • Improve access to employment, especially for local people? • Tackle barriers to employment, such as affordable childcare and skill levels? 	<ul style="list-style-type: none"> • Increase proportion of residents who are employed. • Reduce worklessness amongst high priority groups 	++ 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"> Improve access to employment for those groups currently experiencing above average worklessness, including BME women. 	<ul style="list-style-type: none"> Increase number of jobs available to borough residents. Reduce the employment rate gap between Tower Hamlets and London Increase the median wage of residents 	<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. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	Will the Strategy/Policy... <ul style="list-style-type: none"> Improve the resilience of local businesses and local economy? Support a range of business types and sizes? Stimulate regeneration and support employment opportunities for the borough's residents, particularly those in deprived areas? Provide the infrastructure and workspace required for new and existing businesses? 	<ul style="list-style-type: none"> Retain office and employment space. Measure business use conversion to other uses. Increase number and range of businesses operating in the borough 	++ Site would provide employment within a Strategic Industrial Location (SIL), City Fringe or Preferred Office Location (POL).		
			+ Site would provide employment in a Local Office Location (LOL).		
			0 Site does not provide employment and does not impact on existing employment areas.		
			- Development would result in the loss of employment in a LOL		
			-- Development would result in the loss of employment in the City Fringe, a SIL or POL.		
			? Impact on SIL, POL and LOL is uncertain.		
9. Town Centres: Promote diverse and economically thriving town centres.	<ul style="list-style-type: none"> Support the vitality of diverse town centres that serves the needs and wellbeing of residents? Promote the correct locations for different town centre designations, which take into account future growth scenarios? 	<ul style="list-style-type: none"> Reduce the town centre retail unit vacancy rates. 	++ 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.		
			0 Site outside of a town centre and other criteria do not apply.		

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
			- Site of less than 5ha outside of either a town centre or edge of centre ¹ that includes main town centre uses. ²		
			-- 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.	Will the Strategy/Policy... <ul style="list-style-type: none"> • Protect sites, features and areas of historical, archaeological and cultural value and their setting? • Conserve townscape and neighbourhood character? • Promote high quality architecture and design? • Promote location sensitive density and design? • Protect valued local views? • Protect and enhance cultural assets and spaces for cultural activities? 	<ul style="list-style-type: none"> • Achieve a reduction in the number of entries on the Heritage at Risk register. • Protect historic buildings, including listed buildings, buildings on the local list and areas and buildings in the conservation strategy. 	++ 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		

¹ 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.

² 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:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	<ul style="list-style-type: none"> Help achieve a planned and aesthetically balanced skyline as seen in protected views 		-- 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"> Contributes to meeting the increasing need for open space? Link existing open spaces? Provide open space in areas of scarcity? Improve the quality of open space? Protect or improve public accessibility of open space now and in the future? 	<ul style="list-style-type: none"> Increase the number of eligible open spaces managed to Green Flag standards. Increase the amount of all types of public open space (green, hard, play, sports etc) 	++ 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"> Support the delivery of developments with a reduced need for energy? Reduce emission of greenhouse gases? 	<ul style="list-style-type: none"> Reduce energy consumption across all sectors, including consumption of domestic electricity. 	++ 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:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	<ul style="list-style-type: none"> • Increase the proportion of energy generated from renewable sources? • Increase the number of district energy systems (combined heat and power)? • Reduce fuel poverty? • Reduce impact of climate change, including flooding and urban heat island effect? • Ensure new and retrofitted development and infrastructure location and design is future proofed against the future impact of climate change? • Promote construction? • Deliver development in accessible locations and robust transport infrastructure? 	<ul style="list-style-type: none"> • Reduce carbon emissions. • Reduce energy consumption across all sectors, including consumption of domestic electricity. • Reduce carbon emissions. • Support EU target for near zero energy buildings for 2020 • Support GLA target for delivery of district energy systems. • Support national target of reducing carbon emissions by at least 80% by 2050. • Support London's CO2 emissions reduction target of 60% of 1990 levels by 2025 • Improvements in the energy efficiency ratings for buildings (residential and non-residential) • 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 	+ Not used – see above.		
			0 Score all sites as neutral.		
			- Not used – see above.		
			-- Not used – see above.		
			? Not used – see above.		

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.	Will the Strategy/Policy... <ul style="list-style-type: none"> • Conserve and enhance diverse and varied habitats? • Improve connectivity between wildlife sites? • Integrate further biodiversity provision within new developments? • Protect and enhance local nature conservation designations and/or protected species? • Improve people's access to nature? 	<ul style="list-style-type: none"> • Increase wildlife habitats • Protect European, national and locally designated sites 	++ 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	Will the Strategy/Policy... <ul style="list-style-type: none"> • Improve water quality, reduce piped water use and reduce waste water? • Minimise the production of waste across all sectors and increase reuse, recycling, remanufacturing and recovery rates? • Make appropriate provision for waste management facilities to meet the London Plan apportionment target? • Maintain or improve soil quality? • Promote development on brownfield sites? • Help protect residents from existing poor air quality? 	<ul style="list-style-type: none"> • Improve the biological river quality • Minimise waste and increase rates of reuse and recycling in line with DEFRA and EU standards • Reduce residual household waste per a household • Increase waste sent for refuse, recycling or composting • Make improvements to air quality in line with UK Air Quality Strategy requirements. • Reduce the number of air quality hotspots. 	++ 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).		

Site name:					
Site area:					
Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Basis for appraising sites	Score	Commentary
	<ul style="list-style-type: none"> Reduce emissions of Nitrogen Dioxide/Particulate matter PM10? Contribute towards achieving national and international standards for air quality? 		<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>		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	Will the Strategy/Policy... <ul style="list-style-type: none"> Minimise the risk of all types of flooding to people and property? Promote the use of sustainable urban drainage systems. Ensure developers reduce Surface Water Runoff Rates (with stricter requirements in Critical Drainage Areas? Incorporate the EA TE2100 PLAN? 	<ul style="list-style-type: none"> Not grant planning permission when contrary to Environment Agency advice on flooding and water quality grounds Increase the number of sustainable urban drainage systems in the borough All Developments Reduce surface water runoff in line with London Plan Safe guard corridors of land along existing defence walls. Improve the Riverside and flood defences. 	++ Site is wholly within flood zone 1		
			+ 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.		
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<ul style="list-style-type: none"> Maintain or improve soil quality? Ensure mitigation of adverse effects of contaminated land on human health? Promote development on brownfield sites? 	<ul style="list-style-type: none"> Reduce the amount of contaminated soil 	++ 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 name:					
Site area:					
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

HUDU Rapid Health Impact Assessment Matrix – Second Edition June 2015

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 18)**

Planning reference (if applicable):

Location of project: **Borough wide**

Date of assessment: **October 2016**

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 has created 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"> • Policy 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). • Policy H4 relates to the protection and provision of specialist housing • Strategic Policy H1 encourages the use of The Home Quality Mark, is more comprehensive in scope than the Lifetime Home Standards. 		
<p>Does the proposal address the housing needs of older people, ie extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>See comments above in relation to the Lifetime Homes standard.</p> <ul style="list-style-type: none"> • Policy 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). • Policy H4 relates to the protection and provision of specialist housing 	<p><input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain</p>	

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
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 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 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>Draft Policy 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>Strategic Policy H1 'Delivering Housing' sets out requirements in relation to the provision of affordable housing.</p> <p>Policy H2 'Mixed and Balanced</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
		Communities' seeks to secure a range of housing.		
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	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. Draft Policy ES6 'Achieving 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.	<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>Strategic Policy CSF1 'Supporting Community, Cultural and Social Facilities' and Strategic Policy CSF2 'Safeguarding Community Facilities' seek to retain facilities, re-provide them and also secure new facilities. Section 5 relates to place-making and includes 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	No mitigation or enhancement identified.
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.</p> <p>Policy CSF5 'Health and Medical Facilities' sets 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. At this stage the full impact on health services is uncertain because the scale and location of growth up to 2031 is not yet established.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	Update assessment of impact on health care services in line with growth model and updated population and anticipated distribution of development once the dwelling requirement to 2031 has been established.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
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	Policy CSF5 'Health and Medical Facilities sets out the preferred approach to the provision of future health facilities, this includes a requirement of any evidence that replacement facilities would meet the provider's needs.	<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>Strategic Policy CSF1 'Supporting Community, Cultural and Social Facilities' and Strategic Policy CSF2 'Safeguarding 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 5 relating to place-making also includes strategic sites that include specific proposals for social infrastructure.</p> <p>Policy CSF3 'Pre-school Provision' and CSF4 'Schools and Lifelong Learning' set out the context for the future provision of schools.</p> <p>At this stage the full impact on health services is uncertain because the scale and location of growth up to 2031 is not yet established.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	Update assessment of impact on community facilities in line with growth model and updated population and anticipated distribution of development once the dwelling requirement to 2031 has been established.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
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 under implementation but this might have greater weight if then carried through to a policy, e.g. CSF1.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	Consider including reference to shared community use/co-location in CSF1.
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. CSF4 'Schools and Lifelong Learning' set out the context for the future provision of schools.</p> <p>At this stage the full impact on education services is uncertain because the scale and location of growth up to 2031 is not yet established.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	Update assessment of impact on community facilities in line with growth model and updated population and anticipated distribution of development once the dwelling requirement to 2031 has 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	Strategic Policy OS1 'Creating a Network of Open Spaces' and OS3 'Open Space and Green Grid' accord with this criteria. Section 5 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	No mitigation or enhancement identified.
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	<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>Strategic Policy OS1 'Creating a Network of Open Spaces' and OS3 'Open Space and Green Grid' accord with this criteria. Section 5 relates to place-making includes specific proposals for open space provision associated with strategic sites.</p> <p>At this stage the full impact on open space is uncertain because the scale and location of growth up to 2031 is not yet established.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	<p>Update assessment of impact on open space in line with growth model and updated population and anticipated distribution of development once the dwelling requirement to 2031 has been established.</p> <p>The Green Grid is itself a mitigation for the difficulty in providing new open space in a densely populated area such as Tower Hamlets.</p>
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	Strategic Policy OS1 seeks to create multi-functional spaces that could potentially contribute to this criterion.	<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
		Policy H3 'Housing Standards and Quality' includes a criteria on the provision of play space for children.		
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	Strategic Policy OS1 and OS2 'Enhancing Water Spaces' seeks to ensure that open space and natural space are publicly accessible. Policy OS1 specifically highlights the need for spaces to be accessible from main destination points, such as Town centres, public transport hubs and schools.	<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	Strategic Policy OS1 highlights the need to provide spaces that are suitable for a range of users and that are of a high quality and 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 SG2 'Planning and 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.
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 ES2 'Improving 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 TRN3 '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 DH9 'Noise Pollution' 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	Strategic Policy TRN1 '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	The justification for Policy TRN1 could reference the Walking Plan for Tower Hamlets (2011-2021).
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>Strategic Policy TRN1 'Sustainable Travel' seeks to priorities the needs of pedestrians, cyclists and access to public transport.</p> <p>TRN3 '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	Policy TRN1 could reference the Cycling Plan for Tower Hamlets (2009)
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>Strategic Policy TRN1 'Sustainable Travel' seeks to priorities the needs of pedestrians, cyclists and access to public transport.</p> <p>Policy DH5 'Streets and Public Realm also seeks to improve permeability and legibility of streets.</p> <p>Chapter 5 of the Local Plan on place-making includes proposals for strategic sites and the need to improve connectivity to existing pedestrian and cycling routes is highlighted for relevant sites.</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 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 DH5 'Streets and the Public Realm' identifies the need to incorporate the principles of inclusive design and the safety of pedestrians.	<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 Change' is that growth must be supported by social and transport infrastructure. Key Objective 2 'Spreading 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"> • Policy DH5 'Streets and the Public Realm' identifies the need to improve permeability and legibility to public transport, town centres and facilities. • Strategic Policy TRN1 'Sustainable Travel' seeks to priorities the needs of pedestrians, cyclists and access to public transport. <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.
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 TRN3 '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.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
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"> • Strategic Policy DH1 'Local character, Historic environment and Place sensitive design' seeks to ensure that the internal design and layout of development maximises comfort and usability for occupants. • Policy DH5 'Streets and the Public Realm' identifies the need to improve permeability and legibility to public transport, town centres and facilities. 	<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 DH5 'Streets and the Public Realm' requires development to improve safety and perception of safety to pedestrians including elements to design out crime and fear of crime.</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	The Local Plan could reference designing out crime principles more generally.
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 SG1 'Sustainable Growth in Tower Hamlets which seeks to provide inclusive developments. Strategic Policy DH2 - Creating Attractive and Safe Streets and Spaces 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	Strategic Policy DH1 'Local Character, Historic Environment and Place Sensitive Design' requires proposals to be adaptable to different uses and the changing needs of users.	<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 Draft Local Plan and future versions will be the subject of formal consultation and an Examination by an independent Inspector.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

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 OS3 encourages the use of land for community allotments, particularly where they bring vacant developable land into use on a temporary basis.</p> <p>Policy TC9 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>Strategy Policy TC1 'The Town Centre Hierarchy' establishes a hierarchy of centres.</p> <p>Policy TC2 'Protecting and Enhancing our Town Centres' sets out appropriate uses.</p> <p>Policy TC3 'Protecting and Enhancing Retail in our Town Centres' sets out criteria for the protection of retail units.</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	<p>Policy TC6 'Food, Drink, Entertainment and the Night-time Economy' includes criteria on the location of hot food takeaways and over concentration.</p>	<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 SG1 'Sustainable Growth in Tower Hamlets' identifies the need for proposals to provide local training and employment opportunities.	<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 CSF3 'Pre-school Provision' supports such facilities in suitable locations.	<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	<p>Policy EMP1 'Investment and Job Creation' identifies the need for affordable workspace, including shared workspace.</p> <p>Policy EMP5 'Redevelopment within the Borough's Employment Areas' seeks to secure replacement space in the event that employment within a Local Industrial Location is lost. The need to accommodate small and medium sized enterprises is highlighted.</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 opportunities for work for local people via local procurement arrangements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Policy SG1 'Sustainable Growth in Tower Hamlets' identifies the need for proposals to provide local training and employment opportunities.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No mitigation or enhancement identified.

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	Policy SG1 'Sustainable Growth in Tower Hamlets' meets this criteria. The policy requires developments to incorporate inclusive design principles that encourage social interaction.	<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	Strategic Policy CSF1 'Supporting Community, Cultural and Social Facilities' seeks to protect existing community facilities and provide new ones. Supporting policies relate to specific types of facilities, schools, health etc.	<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	Policy CSF7 'Community Centres and Places of Worship' relates to the provision of facilities for these sectors.	<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	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 components referred to in the criterion are identified in the Government guidance as:	<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
		<ul style="list-style-type: none"> • Empowering residents to develop lifetime neighbourhoods – especially resident empowerment • Access – enabling residents to connect with services and facilities, both physically and virtually; • Services and amenities – a mix of residential, employment and retail uses; • 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; • 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; • Housing – a range of choices, inclusive design principles and homes designed to meet changing needs. <p>Although the Local Plan does not use the term ‘Lifetime Neighbourhoods’ it is clear from a review of the principles that policies in the Local Plan are consistent with the principles. Relevant policies include:</p> <ul style="list-style-type: none"> • Policy SG1 ‘Sustainable Growth in Tower 		

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
		<p>Hamlets' is consistent with the principles relating to access, service and amenities, built and natural environments and social networks and housing;</p> <ul style="list-style-type: none"> • Strategic Policy TRN1 'Sustainable Travel' is consistent with the principle relating to access; • Strategic Policy CSF1 'Supporting Community, Cultural and Social Facilities' seeks to protect existing community facilities and provide new ones – providing opportunity for social networking and access to services and amenities; • Strategic Policy H1 'Delivering Housing' is consistent with the principle relating to housing. 		

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>Strategic Policy SG1 'Sustainable Growth in Tower Hamlets' seeks to ensure that development makes full use of land but not over development.</p> <p>Strategic Policy DH1 'Local Character, Historic Environment and Place Sensitive Design' sets out more detailed criteria on this.</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	<p>Strategic Policy SG1 'Sustainable Growth in Tower Hamlets' seeks to ensure that development uses recycled materials.</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 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 25th 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> <p>Strategic Policy SG1 'Sustainable Growth in Tower Hamlets' requires the use of BREEAM for non-</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Uncertain	No mitigation or enhancement identified.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions
		<p>residential development.</p> <p>Policy ES5 '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>		

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	In accordance with the London Plan the Local Plan includes policies in relation to a reduction in carbon emissions. This includes on site provision of renewable energy, where feasible.	<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 DH10 '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 ES3 'Urban Greening and Biodiversity' requires the protection of trees and incorporation of trees wherever possible.</p> <p>The Housing Quality Mark referenced in Strategic Policy H1 Delivering Housing.</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	<p>Strategic Policy ES1 requires development to contribute to biodiversity enhancement.</p> <p>Policy ES3 'Urban Greening and Biodiversity' requires the provision of living building elements. Major development will be required to submit an</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>Ecology Assessment demonstrating biodiversity enhancement.</p> <p>Policy OS4 'Protecting the Blue Ribbon Network' seeks to enhance the ecological and biodiversity quality of the 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 ES4 of the Draft Local Plan 'Reducing Flood Risk' requires proposals to demonstrate how they will incorporate sustainable drainage techniques. Policy 5.12 of the London Plan 'Flood Risk Management' and the Mayor's housing supplementary planning guidance requires 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: EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

Name of 'proposal' and how has it been implemented (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 18)
Directorate / Service	Strategic Planning - Plan Making Team Directorate of Development & Renewal
Lead Officer	Hong Chen
Signed Off By (inc date)	Ellie Kuper Thomas (19/10/16)
Summary – to be completed at the end of completing the QA (using Appendix A)	<div style="display: flex; align-items: flex-start;"> <div style="width: 20px; height: 20px; background-color: green; margin-right: 10px;"></div> <div> <p>Proceed with implementation</p> <p>Based on the QA a Full EA is not necessary at this stage in the process as the Draft Local Plan does not appear to have any adverse effects on people who share Protected Characteristics. Rather steps will be taken to ensure due regard for the nine protected groups 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 Draft Local Plan does not appear to have any adverse effects on people who share Protected Characteristics and no further actions are recommended at this stage. This needs to be kept under review as the Local Plan develops.</p> </div> </div>

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)
1	Overview of Proposal		
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 embeds the One Tower Hamlets principles into Policy SG1 ‘Sustainable Growth in Tower Hamlets.’</p> <p>The two key objectives are 1) managing growth and shaping change and 2) spreading 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 need, which will include the needs of those who share Protected Characteristics. 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> <ul style="list-style-type: none"> • Policy SG1 ‘Sustainable Growth in Tower Hamlets’ which includes the need for Major Developments and Estate Regeneration Schemes thorough and inclusive public consultations, and the delivery of the One Tower

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)
			<p>Hamlets principles by creating mixed and balanced communities, incorporating inclusive design principles, local training and employment opportunities and infrastructure and public realm improvements that are accessible to all, Strategic Policy DH1 ‘;</p> <ul style="list-style-type: none"> • Strategic Policy H1 ‘Delivering Housing’ sets out requirements in relation to the provision of affordable housing; • Policy H2 ‘Mixed and Balanced Communities’ which seeks to secure a range of housing; • Policy H4 relates to the protection and provision of specialist housing; • Policy H5 ‘Gypsies and Travellers, is a policy on the future provision of accommodation for the Gypsy and Traveller community, it also safeguards an existing site; • A range of policies 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"> ○ Strategic Policy CSF1 ‘Supporting Community, Cultural and Social Facilities’ ○ Strategic Policy CSF2 ‘Safeguarding Community Facilities, ○ CSF4 ‘Schools and Lifelong Learning’ ○ CSF5 ‘Health and Medical Facilities,’ ○ CSF7 ‘Community Centres and Places of Worship,’ ○ CSF8 Cultural Facilities, ○ TRN1 ‘Sustainable Travel’ <p>The Local Plan identifies strategic sites that can meet development needs to 2031 but the quantum of development required to 2031, particularly housing, will be</p>

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)
			established as the Plan develops. A detailed review of Local Plan policies has been undertaken and has not identified 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	<p>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 Equalities team no instances have been identified where the content of policies would give rise to adverse effects on people who share protected characteristics.</p> <p>The Council's Borough Profile (2014) provides an overview of the equality groups, although at the Borough level there is a recognised gap in knowledge about sexual orientation and gender reassignment. The Council's Senior Strategy, Policy & Performance Officer (Equality) acknowledged that these will need to be addressed at the corporate level rather than through the Local Plan.</p>
2	Monitoring / Collecting Evidence / Data and Consultation		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	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 of 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.


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)
			Consultation responses will be analysed by the Council and any relevant issues highlighted.
	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 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 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. Forthcoming public engagement activities are currently being designed and the results from this will inform the next stage of the Local Plan. The approach to this assessment has been discussed with the Council's Senior Strategy, Policy & 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 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>


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)
			There is an external stakeholder group which engages the Borough's statutory consultees.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	<p>Consultation has already taken place through an Issues and Options style paper in late 2015/early 2016. There is a further programme of engagement in November – December on the consultation document. There will be further rounds of formal consultation as the Local Plan develops, anticipated to be undertaken in Spring/Summer 2017. 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. 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 is that the policy team considers 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.</p>
3	Assessing Impact and Analysis		
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 people who share Protected Characteristics.</p> <p>Officers have discussed the policies with the Equalities team to make sure that policies are appropriately worded.</p>

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	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	Yes	Policy SG1 'Sustainable Growth in Tower Hamlets' of the Draft Local Plan contains two key objectives: 1) managing growth and shaping change and 2) spreading 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 and demonstrates 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.
4	Mitigation and Improvement Action Plan		
a	Is there an agreed action plan?	Yes	The next stage will involve consultation on the Draft Local Plan and a review of consultation responses. Officers will work with the Equalities team to review relevant representations and an appropriate response.
b	Have alternative options been explored	Yes	In developing policies consideration has been given to the merits of retaining existing policies from the existing development plan.
5	Quality Assurance and Monitoring		
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 people who share Protected Characteristics at each stage. Following consultation on

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)
			the Draft Local Plan a 'Proposed Submission Local Plan' will be produced in spring/summer 2017, following consultation on this 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.
6	Reporting Outcomes and Action Plan		
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

Decision	Action	Risk
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	Suspend – Further Work Required	Red 

<p>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>		
<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>	<p>Proceed with implementation</p>	<p>Green:</p> 

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 (ie 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.



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London Borough of Tower Hamlets

Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Consultation Draft

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



October 2016

Amec Foster Wheeler Environment
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Document revisions

No.	Details	Date
1	Draft for client comment	14/10/16

Executive summary

The London Borough of Tower Hamlets 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 site¹ or a European offshore marine site² (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 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. 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 the 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 Draft 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 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 LBTH 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 measureable 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.

The assessment of the draft plan has concluded the following:

- ▶ Epping Forest SAC is currently affected by air pollution and visitor pressure, which may be affected by the LBTH plan; however, the LBTH plan is considered unlikely to result in significant increases in visitor pressure or air pollution (alone, or in combination) due to the distances to the site and hence limited exposure of the interest features to the outcomes of the plan.
- ▶ Lee Valley SPA / Lee Valley Ramsar are mostly in favourable or 'unfavourable recovering' condition and no specific pressures are identified for the site; the likely outcomes of the LBTH

¹ 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.

² '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.



plan are considered unlikely to result in significant effects (alone, or in combination) on these sites due to the limited exposure and sensitivity of the interest features to the likely outcomes of the plan.

The assessment also reviewed the draft policies; none of these are likely to have significant effects, although some amendments may be appropriate to ensure that any residual risk of effects, particularly on Epping Forest SAC as a result of air pollution, is appropriately managed.



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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 regional government. 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 site³ or a European offshore marine site⁴ (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)⁵. 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 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 be run as an iterative process alongside the plan development, with the emerging policies or options

³ 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.

⁴ '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.

⁵ 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.



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 will also include Sustainability Appraisal/Strategic Environmental Assessment, Equalities Impact Assessment and Health Impact Assessment. This report summarises our assessment of the 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 does not provide a formal conclusion to the HRA process; rather, it identifies potential mechanisms by which the 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 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) guidance⁶ 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
<p>Stage 1 – Screening</p> <p>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.</p>
<p>Stage 2 – Appropriate Assessment</p> <p>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.</p>
<p>Stage 3 – Assessment of Alternative Solutions</p> <p>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.</p>
<p>Stage 4 – Assessment Where No Alternative Solutions Exist and Where Adverse Impacts Remain</p> <p>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.</p>

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 effect⁷.

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)

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

⁷ 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 (2013) *The Habitats Regulation Handbook* [online]. Available at: <http://www.dtapublications.co.uk/handbook/>. Accessed 11.06.15.
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- ▶ European Commission (2000). *Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/433/EEC*. European Commission, Brussels.
- ▶ 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 LBTH 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 LBTH 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. Therefore the assessment of the potential for in-combination effects will be undertaken to inform the preparation of the Proposed Submission 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 guidance⁸ 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

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



- iii. Habitats Regulations Appraisal of the Plan at the lower tier is required as a matter of law or Government policy

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.⁹ 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 [†]	Interest Features
Epping Forest SAC	4.2km to NE	<p><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>Illici-Fagenion</i>); European dry heaths (Q); Northern Atlantic wet heaths with <i>Erica tetralix</i> (Q).</p> <p><u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i>.</p>
Richmond Park SAC	13.6 to SW	<p><u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i>.</p>
Wimbledon Common SAC	11.9km to SW	<p><u>Annex I Features:</u> European dry heaths (Q); Northern Atlantic wet heaths with <i>Erica tetralix</i> (Q).</p> <p><u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i>.</p>
Lee Valley SPA	3.5km to N	<p><u>Article 4.1 qualification:</u> Bittern <i>Botaurus stellaris</i> (W)</p> <p><u>Article 4.2 qualification:</u> Gadwall <i>Anas strepera</i> (W); Shoveler <i>Anas clypeata</i> (W)</p>
Lee Valley Ramsar	3.5km to N	<p><u>Criterion 2:</u> Supports vulnerable, endangered, or critically endangered species or threatened ecological communities (nationally scarce plant species; rare or vulnerable invertebrates)</p> <p><u>Criterion 6:</u> Regularly supports 1% of the individuals in a population of one species/subspecies of waterbirds (gadwall and shoveler in winter)</p>

Table Notes

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

- † 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

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;
- ▶ information on the site condition, based on the NE condition assessments for corresponding SSSI units.

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. 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 SSSIs 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.

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
Epping Forest SAC		
<p><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).</p> <p><u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i>.</p>	<p>F: 36.5% UR: 45.6% UNC: 15.9% UD: 2%</p>	<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"> ▶ air pollution (atmospheric nitrogen deposition exceeds site-relevant critical loads for ecosystem protection); ▶ management (particularly undergrazing in heath areas); and ▶ public access and disturbance. <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>
Richmond Park SAC		
<p><u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i>.</p>	<p>F: 0% UR: 100% UNC: 0% UD: 0%</p>	<p>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 ‘favourable recovering’ following the development of a management plan, and the SIP notes that “<i>no current issues affecting the Natura 2000 feature(s) have been identified on this site</i>”.</p>
Wimbledon Common SAC		
<p><u>Annex I Features:</u> European dry heaths (Q); Northern Atlantic wet heaths with <i>Erica tetralix</i> (Q).</p> <p><u>Annex II Features:</u> Stag beetle <i>Lucanus cervus</i>.</p>	<p>F: 0% UR: 95% UNC: 5% UD: 0%</p>	<p>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:</p> <ul style="list-style-type: none"> ▶ public access and disturbance; and ▶ air pollution (atmospheric nitrogen deposition exceeds site-relevant critical loads for ecosystem protection, particularly for heath and mire vegetation). <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
Lee Valley SPA		
<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.
<u>Article 4.2 qualification:</u> Gadwall <i>Anas strepera</i> (W); Shoveler <i>Anas clypeata</i> (W)		
Lee Valley Ramsar		
<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 <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.
**	Based on the condition assessments of the SSSI units that correspond to the relevant European sites

Conservation Objectives

The conservation objectives for all of the 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. Initial 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 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 Local Plan could affect these 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 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 proximity¹⁰.

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. Disturbance¹¹ of fauna due to recreational activities can also be a significant problem at some sites, although the relationship (again) is

¹⁰ '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.

¹¹ 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 LBTH 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
Solent Disturbance and Mitigation Project (Fearnley et al. 2010)	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.
Thames Basin Heaths (Liley et al. 2005)	Thames Basin Heaths SPA (Heathland sites; urban areas; disturbance of birds)	70% of visitors travel 5km or less to access sites

Whitehall and Bordon Ecotown (EPR 2012)	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: - Frensham Common: 10.7km - Kingsley Common: 7.4km - Bramshott Common: 4.5km - Woolmer Forest: 3.4km - Longmoor Enclosure: 3.2km - Ludshott Common: 2.9km - Broxhead Common: 2.1km - Hogmoor Inclosure: 0.9km - Shortheath Common: 0.6km - Bordon Enclosure: 0.5km
Ashdown Forest (UE / University of Brighton 2009)	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'¹² 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 most¹³, 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

¹² i.e. the distance within which 75% of visits originate.

¹³ 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 watersports 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 (SO₂, typically from combustion of coal and heavy fuel oils), nitrogen oxides (NO_x, mainly from vehicles) and ammonia (NH₃, typically from agriculture), which (together with secondary aerosol pollutants¹⁴) 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)¹⁵. 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 4.1 Main Air Pollutants, Pathways and Effects

Pollutant	Pathway	Summary of Effects
Ammonia (NH₃)	Primarily from agriculture through decomposition of animal manure and slurry.	Emissions contribute to acidification and (particularly) eutrophication.
Nitrogen oxides (NO_x)	All combustion processes produce oxides of nitrogen (NO _x) in air; road transport is the main source, followed by the electricity supply industry. 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.
Sulphur Dioxide (SO₂)	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.	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 SO_x and NO_x emissions in recent years and a consequent decrease in acid deposition; in England, SO_x and 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 NO_x background levels have shown a slow decline since 2008 (London Datastore 2016).

The effect of SO_x and 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 (NEGTA 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 loads¹⁶ for nutrient-N deposition and acidification are met or exceeded. APIS provides

¹⁴ Secondary pollutants are not emitted, but are formed following further reactions in the atmosphere; for example, SO₂ and NO_x are oxidised to form SO₄²⁻ and NO₂⁻ compounds; ozone is formed by the reaction of other pollutants (e.g. NO_x or volatile organic compounds) with UV light; ammonia reacts with SO₄²⁻ and NO₂ to form ammonium (NH₄⁺).

¹⁵ Nitrogen that is in a form that can be absorbed and used by plants.

¹⁶ '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 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 4.2 Summary of APIS interrogation

Site	Air quality sensitive features (abbreviated)	Over CL?	
		Acid	N
Epping Forest SAC	Atlantic acidophilous beech forests	++	++
	European dry heaths	+	++
	Northern Atlantic wet heaths	+	++
Wimbledon Common SAC	European dry heaths	+	+
	Northern Atlantic wet heaths	+	+
Epping Forest SAC	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 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*¹⁷ 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 2007) 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. This is

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

arguably correct, since trans-boundary air pollution can only be realistically addressed by national legislation or higher-tier plans, policies or strategies. As a result, 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 period¹⁸. The calculations account for any reductions in abstraction that are required to safeguard European sites¹⁹ 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 sites²⁰.

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. Having said that, the Local Plan can obviously help manage demand and promote water efficiency measures through its policy controls.

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

¹⁸ 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.

¹⁹ 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 resolves deficits, and not through the existing permissions regime.

²⁰ 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.

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)²¹. 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). Since the water quality effects of the plan are ultimately either controlled by existing consents regimes (which must undergo HRA) it is more appropriate to focus on the development of suitable mitigating policy that will minimise the impacts of plan-supported development on water quality in the Thames. Therefore, effects on downstream European sites due to water quality changes associated with the plan are not considered further.

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.

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 LBTH Local Plan. However, many

²¹ 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.

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

Aspect	Initial Screening Summary	Consider further?
Public access and disturbance	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	Review plan policies for opportunities to enhance local recreation.

	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).	
Atmospheric pollution	<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 & 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. As noted (see Section 4.1), current case-practice suggests that HRAs of local plans <i>"can only be concerned with locally emitted and short range locally acting pollutants"</i> 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. As a result, the LBTH plan should focus on the development of suitable policies that will minimise the contribution of plan-supported development to overall diffuse pollution.</p>	Review plan policies for opportunities to minimise and reduce contributions to air pollution.
Water resources	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
Water quality	The site is not hydrologically connected to the LBTH area; water quality will not be affected by the outcomes of the LBTH plan.	No
Flooding / water management	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
Effects on mobile species	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?
Public access and disturbance	<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>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).</p>	Review plan policies for opportunities to enhance local recreation.
Atmospheric pollution	<p>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).</p> <p>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 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 minimise the contribution of plan-supported development to overall diffuse pollution.</p>	Review plan policies for opportunities to minimise and reduce contributions to air pollution.
Water resources	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
Water quality	The site is not hydrologically connected to the LBTH area; water quality will not be affected by the outcomes of the LBTH plan.	No
Flooding / water management	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
Effects on mobile species	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 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
General statements of policy / aspiration	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.
General design / guidance criteria or policies that cannot lead to or trigger development	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.
External plans / projects	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).
Environmental protection policies	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).
Policies which make provision for change but which could have no conceivable effect	Policies or proposals the which 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 4.9 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;
- ▶ **‘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 undertaken during the policy development phase 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 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 4.3 Summary of draft policy review

Policy	Assessment	Rationale
Policy SG 1 Sustainable Growth in Tower Hamlets	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')
Policy SG2 Planning and Construction of New Development	No effect; amendments recommended	General design / guidance criteria. Although the risk to European sites is low due to existing controls and distances from receptors, it is suggested 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 present before development proceeds.
Strategic Policy DH1 Local Character, Historic Environment and Place-Sensitive Design	No effect	General design / guidance criteria.
Strategic Policy DH2 Creating Attractive and Safe Streets and Spaces	No effect	General design / guidance criteria.
Policy DH3 Heritage and the Historic Environment	No effect	Environmental protection policy
Policy DH4 World Heritage Sites	No effect	Environmental protection policy
Policy DH5 Streets and the Public Realm	No effect	General design / guidance criteria.
Policy DH6 Building Heights	No effect	General design / guidance criteria.
Policy DH7 Density	No effect	General design / guidance criteria.
Policy DH8 Amenity	No effect; amendments recommended	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.
Policy DH9 Noise Pollution	No effect	Environmental protection policy
Policy DH10 Overheating	No effect	General design / guidance criteria.
Policy DH11 Shopfronts	No effect	General design / guidance criteria.
Policy DH12 Advertisements and Hoardings	No effect	General design / guidance criteria.
Policy DH13 Telecommunications	No effect	General design / guidance criteria.

Policy	Assessment	Rationale
Strategic Policy H1 Delivering Housing	No significant effect; amendments recommended	Strategic Policy H1 sets out the anticipated housing growth for the borough and preferred locations for the majority of new housing (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 advocated 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 H2 Mixed and Balanced Communities	No effect	General design / guidance criteria.
Policy H3 Housing Standards and Quality	No effect	General design / guidance criteria.
Policy H4 Specialist Housing	No effect	General design / guidance criteria.
Policy H5 Gypsies and Travellers	No effect	General design / guidance criteria.
Policy H6 Student Housing	No effect	General design / guidance criteria.
Strategic Policy EMP1 Investment and Job Creation	No effect	General statement of policy.
Strategic Policy EMP2 Employment locations	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.
Policy EMP3 Providing New Employment Space	No effect	General design / guidance criteria.
Policy EMP4 Protecting Employment	No effect	General statement of policy.
Policy EMP5 Redevelopment within the Borough's Employment Areas	No effect	General design / guidance criteria.
Strategic Policy TC1 The Town Centre Hierarchy	No effect	General statement of policy.
Strategic Policy TC2 Protecting and Enhancing Our Town Centres	No effect	General design / guidance criteria.
Policy TC3 Protecting and Enhancing Retail in Our Town Centres	No effect	General design / guidance criteria.
Policy TC4 Managing and Supporting Retail Outside of Our Town Centres	No effect	General design / guidance criteria.

Policy	Assessment	Rationale
Policy TC5 Financial and Professional Services	No effect	General design / guidance criteria.
Policy TC6 Food, Drink, Entertainment and the Night-time Economy	No effect	General design / guidance criteria.
Policy TC7 Short-stay Accommodation	No effect	General design / guidance criteria.
Policy TC8 Offices within the Town Centre	No effect	General design / guidance criteria.
Policy TC9 Markets	No effect	General design / guidance criteria.
Strategic Policy CSF1 Supporting community, cultural and social facilities	No effect	General statement of policy.
Strategic Policy CSF2 Safeguarding Community Facilities	No effect	General design / guidance criteria.
Policy CSF3 Pre-school Provision	No effect	General statement of policy.
Policy CSF4 Schools and Lifelong Learning	No effect	General statement of policy.
Policy CSF5 Health and Medical Facilities	No effect	General statement of policy.
Policy CSF6 Sports and Leisure	No effect	General statement of policy.
Policy CSF7 Community Centres and Places of Worship	No effect	General statement of policy.
Policy CSF8 Cultural Facilities	No effect	General statement of policy.
Policy CSF9 Public Houses	No effect	General statement of policy.
Strategic Policy OS1 Creating a Network of Open Spaces	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.
Strategic Policy OS2 Enhancing Water Spaces	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.
Policy OS3 Open Space and Green Grid	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.
Policy OS4 Protecting the Blue Ribbon Network	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.
Strategic Policy ES1 Protect and Enhance our Environment	No effect.	Protective policy

Policy	Assessment	Rationale
Policy ES2 Improving Air Quality	No effect; amendments recommended	The policy should help drive a reduction in air pollution, in conjunction with London-wide policies; however given that air quality is the principal pressure identified for Epping Forest SAC it is 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.
Policy ES3 Urban Greening and Biodiversity	No effect	General statement of policy.
Policy ES4 Reducing Flood Risk	No effect	General design / guidance criteria.
Policy ES5 Sustainable Water Management	No effect	General design / guidance criteria.
Policy ES6 Achieving a Zero Carbon Borough	No effect	General design / guidance criteria.
Policy ES6 Contaminated land and development and storage of hazardous substances	No effect	Environmental protection policy.
Policy ES7 Waste Management	No significant effect	The allocated waste management areas will not significantly affect any European sites, other than potentially through diffuse / cumulative air pollution issues (which are controlled through other policies).
Policy ES8 Waste Management Capacity	No effect	General design / guidance criteria.
Strategic Policy TRN1 Sustainable Travel	No effect	General design / guidance criteria; part of a suite of policies likely to help manage air quality changes in the borough.
Policy TRN2 Assessing the Impacts on the Transport Network	No effect	General design / guidance criteria.
Policy TRN3 Parking and Permit-free	No effect	General design / guidance criteria.
Policy TRN4 Sustainable Transportation of Freight	No effect; amendments recommended	The policy should help drive a reduction in air pollution, in conjunction with London-wide policies; however given that air quality is the principal pressure identified for Epping Forest SAC it is suggested that the text of the policy (or supporting text) require that developments generating significant numbers of vehicle trips undertake modelling or route analysis to determine the potential effects on European sites outside the borough (particularly Epping Forest SAC).
Policy DC1 Planning Contributions	No effect	General statement of policy.

4.5 Summary of Draft Plan Assessment Conclusions

The HRA 'screening' undertaken has reviewed the available data and the draft plan. The initial assessment conclusion is that the 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 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 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 4.11 identifies policies that would benefit from amendments to maximise their effectiveness in reducing residual risk. In particular:

- ▶ **Air Quality:** it is recommended that Policy ES2 be used to help ensure that development arising from the LBTH plan plays a full part (with other plans) in reducing diffuse air pollution that may affect Epping Forest SAC. It is 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; the text within the existing local plan is likely to be appropriate, although 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).
- ▶ **Public Access:** It is unlikely that visitor pressure on Epping Forest SAC will increase significantly as a result of the LBTH plan, such that the LBTH 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 OS1 – OS4 are met as part of their developments in order to demonstrate the avoidance of potentially significant or adverse effects on European sites.

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SA of Draft Policies: Sustainable Growth in Tower Hamlets

SA Objective	Commentary	Draft Policies		Cumulative Effect of the Draft Policies
		SG1: Sustainable Growth in Tower Hamlets	SG2: Planning and Construction of New Development	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><u>Likely Significant Effects</u></p> <p>Whilst Policy SG1 includes reference to BREAAAM standards it does not explicitly require housing proposals to consider energy efficiency and/or the provision of decentralised energy systems, these are covered in Policy ES6. This prevents Policy SG1 as drafted from contributing to fuel poverty reduction. However, Policy SG1 does set out accessibility related criteria which would reduce social exclusion through ensuring access to key places, sets out health related criteria which would positively affect the Borough's relative IMD ranking, and requires proposals for estate regeneration to undertake thorough and inclusive pre-application consultations which would support active citizenship. Therefore the policy would have a minor positive effect on this SA objective.</p> <p>There is no clear relationship between policy SG2 and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	~	0
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><u>Likely Significant Effects</u></p> <p>Policy SG1 sets out requirements for infrastructure provision and high quality design, which would directly contribute to this SA objective through ensuring appropriate infrastructure alongside development proposals and promoting high quality public realm.</p> <p>Policy SG2 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 construction related noise, vibration and pollution impacts.</p> <p><u>Mitigation</u></p> <p>To enhance the contribution of Policy 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.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++

SA Objective	Commentary	Draft Policies		Cumulative Effect of the Draft Policies
		SG1: Sustainable Growth in Tower Hamlets	SG2: Planning and Construction of New Development	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><u>Likely Significant Effects</u></p> <p>Policy SG1 sets out criteria to minimise pollution and ensure that development proposals contribute to healthy environments, including requiring certain proposals to complete a Health Impact Assessment (HIA). However, as drafted Policy SG1 does not set out the minimum content of HIAs, identify how the significance of health impacts should be objectively assessed or require adverse significant health impacts to be mitigated, all of which constraints the effectiveness of HIAs in relation to this SA objective. In addition Policy SG1 does not seek to restrict activities with negative health externalities, albeit this could be achieved through consideration of HIAs in planning determinations.</p> <p>Policy SG2 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.</p> <p><u>Mitigation</u></p> <p>To enhance the contribution of Policy SG1 towards this SA object it is recommended that the supporting text could reference the Healthy Urban Development Unit's 'Healthy Urban Planning Checklist' (June 2015).</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></p> <p>Policy SG1 requires development proposals to be of a high quality design and also seeks to maximise the provision of accessible housing. 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> <p>There is no clear relationship between Policy SG2 and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></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><u>Uncertainties</u></p> <p>None identified.</p>	++	~	0

SA Objective	Commentary	Draft Policies		Cumulative Effect of the Draft Policies
		SG1: Sustainable Growth in Tower Hamlets	SG2: Planning and Construction of New Development	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><u>Likely Significant Effects</u></p> <p>Policy SG1 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>SG2 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> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></p> <p>Policy SG1 requires development proposals to include relevant infrastructure provision, 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.</p> <p>There is no clear relationship between Policy SG2 and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></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><u>Uncertainties</u></p> <p>None identified.</p>	++	~	0
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><u>Likely Significant Effects</u></p> <p>Policy SG1 seeks to maximise the provision of accessible employment locations and provide local training or employment opportunities. This would increase access to employment opportunities and could</p>	+	~	0

SA Objective	Commentary	Draft Policies		Cumulative Effect of the Draft Policies
		SG1: Sustainable Growth in Tower Hamlets	SG2: Planning and Construction of New Development	
	<p>help to reduce worklessness by seeking to secure local training and employment during both the construction and operational phase.</p> <p>There is no clear relationship between Policy SG2 and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>			
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><u>Likely Significant Effects</u></p> <p>Policy SG1 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 SG1 does not seek to influence or direct economic growth to stimulate regeneration, improve resilience or provide specific types of employment uses.</p> <p>There is no clear relationship between Policy SG2 and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	~	0
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></p> <p>As drafted there is no clear relationship between Policy SG1 and this SA objective, as the policy does not set out criteria to focus development around Town Centres. There is also no clear relationship between Policy SG2 and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p>	~	~	0

SA Objective	Commentary	Draft Policies		Cumulative Effect of the Draft Policies
		SG1: Sustainable Growth in Tower Hamlets	SG2: Planning and Construction of New Development	
	<p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>			
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p>Likely Significant Effects</p> <p>Criterion 1 within Policy SG1 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>Use of the considerate constructors programme required under SG2 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, a minor positive effect is therefore anticipated.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	+	0
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>Likely Significant Effects</p> <p>Criterion 1 within Policy SG1 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 clear relationship between Policy SG2 and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	~	0
12. Climate change: Ensure the Local Plan incorporates	<p>Likely Significant Effects</p>	+	+	+

SA Objective	Commentary	Draft Policies		Cumulative Effect of the Draft Policies
		SG1: Sustainable Growth in Tower Hamlets	SG2: Planning and Construction of New Development	
mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p>In line with this SA objective policy SG1 includes an expectation of reducing carbon emissions and reference to BREAAAM standards.</p> <p>Policy SG2 includes measures to ensure that congestion is reduced and could make a minor positive contribution to this objective.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>			
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u></p> <p>Both policies SG1 and SG2 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 ES3 'Urban Greening and Biodiversity.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></p> <p>Both policies SG1 and SG2 support this SA objective through seeking to protect amenity 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 SG1 (3) will help ensure that sustainable design standards are incorporated in development, contributing to this objective throughout the life of a project. Policy SG2 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><u>Mitigation</u></p> <p>None identified.</p>	+	+	+

SA Objective	Commentary	Draft Policies		Cumulative Effect of the Draft Policies
		SG1: Sustainable Growth in Tower Hamlets	SG2: Planning and Construction of New Development	
	<p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>			
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><u>Likely Significant Effects</u></p> <p>Policy SG1 requires developments to incorporate sustainable design principles and to consider construction impacts on the water supply, flood risk and drainage, all of which would enhance flood risk management and contribute significantly to this SA objective.</p> <p>Policy SG2 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	+	+
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><u>Likely Significant Effects</u></p> <p>Policies SG1 and SG2 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><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++

SA of Draft Policies: Design and Historic Environment

SA Objective	Commentary	Draft Policies											Cumulative Effect of the Draft Policies		
		Strategic Policy DH1: Local Character, Historic Environment and Place-Sensitive Design	Strategic Policy DH2: Creating Attractive and Safe Streets and Spaces	Policy DH3: Heritage and the Historic Environment	DH4: World Heritage Sites	DH5: Streets and the Public Realm	DH6 - Building Heights	DH7 - Density	DH8 - Amenity	DH9 - Noise Pollution	DH10 - Overheating	DH11 - Shopfronts		DH12 - Advertisements and Hoardings	DH13 - Telecommunications
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p>Likely Significant Effects</p> <p>Strategic Policy DH1 requires development proposals to demonstrate good placemaking principles whilst policy DH5 sets out criteria to ensure that development proposals, open spaces and public realm are accessible and sustainable. This would 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>Strategic Policy DH2 requires development proposals to follow a street hierarchy which prioritises pedestrians and supports both the movements and place functions of streets. 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>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	?	?	+	?	?	?	?	?	?	?	?	0
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p>Likely Significant Effects</p> <p>Strategic Policy DH1 and Strategic Policy 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 DH5 sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks. The policy also requires proposals to embed the principles of Secured by Design and to incorporate high quality public realm. These criteria would directly promote access to high quality open spaces, facilitate public realm improvements, and enhance both perceptions of and</p>	++	++	?	?	++	?	+	++	++	?	++	++	++	++

SA Objective	Commentary	Draft Policies											Cumulative Effect of the Draft Policies		
		Strategic Policy DH1: Local Character, Historic Environment and Place-Sensitive Design	Strategic Policy DH2: Creating Attractive and Safe Streets and Spaces	Policy DH3: Heritage and the Historic Environment	DH4: World Heritage Sites	DH5: Streets and the Public Realm	DH6 - Building Heights	DH7 - Density	DH8 - Amenity	DH9 - Noise Pollution	DH10 - Overheating	DH11 - Shopfronts		DH12 - Advertisements and Hoardings	DH13 - Telecommunications
	<p>actual safety and security, resulting in a directive contribution to this SA objective.</p> <p>Increased densities can impact on individual quality of life through increased disturbance and disruption. Policy DH7 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.</p> <p>Policy DH8 encourages the creation of attractive and useable open spaces and requires development proposals to avoid unacceptable nuisances and pollution impacts, which would directly contribute to this SA objective through increasing access to open space and mitigating amenity impacts from development.</p> <p>Policy DH9 directly contributes to this SA objective through safeguarding noise sensitive receptors from adverse noise impacts resulting from development proposals.</p> <p>Policies DH11 and DH12 require shopfronts, signage and advertising proposals to make a positive contribution to the public realm, which directly contributes to this SA objective through protecting and enhancing the quality of the public realm. Similarly policy D13 requires proposed telecommunications infrastructure to integrate with its surroundings, which would safeguard the quality of the public realm and therefor indirectly contribute to this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>Strategic policy DH1 could highlight the need for all development to incorporate designing out crime principles.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <ul style="list-style-type: none"> None identified. 														
3. Health and wellbeing: Improve the health and	Likely Significant Effects	++	+	~	~	++	~	~	++	++	++	~	~	~	++

SA Objective	Commentary	Draft Policies											Cumulative Effect of the Draft Policies		
		Strategic Policy DH1: Local Character, Historic Environment and Place-Sensitive Design	Strategic Policy DH2: Creating Attractive and Safe Streets and Spaces	Policy DH3: Heritage and the Historic Environment	DH4: World Heritage Sites	DH5: Streets and the Public Realm	DH6 - Building Heights	DH7 - Density	DH8 - Amenity	DH9 - Noise Pollution	DH10 - Overheating	DH11 - Shopfronts		DH12 - Advertisements and Hoardings	DH13 - Telecommunications
	<p>Uncertainties</p> <p>None identified.</p>														
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p>Likely Significant Effects</p> <p>Strategic Policy DH1 and Strategic Policy DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design, whilst Policy DH5 sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks and include high quality public realm. 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 major positive effect on this SA objective.</p> <p>DH6 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.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	++	~	~	++	+	~	~	~	~	~	~	~	+
9. Town Centres: Promote diverse and economically thriving town centres.	<p>Likely Significant Effects</p> <p>The policies identified seek to secure an attractive public realm and avoid noise pollution. They will help achieve this objective by encouraging an attractive built environment that will help maintain the vitality of town centres.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p>	++	++	~	~	++	~	~	~	++	++	~	~	~	++

SA Objective	Commentary	Draft Policies											Cumulative Effect of the Draft Policies		
		Strategic Policy DH1: Local Character, Historic Environment and Place-Sensitive Design	Strategic Policy DH2: Creating Attractive and Safe Streets and Spaces	Policy DH3: Heritage and the Historic Environment	DH4: World Heritage Sites	DH5: Streets and the Public Realm	DH6 - Building Heights	DH7 - Density	DH8 - Amenity	DH9 - Noise Pollution	DH10 - Overheating	DH11 - Shopfronts		DH12 - Advertisements and Hoardings	DH13 - Telecommunications
	<p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>														
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p>Likely Significant Effects</p> <p>Policies DH3 and DH4 set out criteria to protect a range of recognised heritage asset. The other policies require development proposals to achieve high architectural, urban design and placemaking standards, positively contribute to townscape character and the public realm and adequately protect the amenity of adjacent sites and the public. All of the policies therefore directly contribute to this SA objective and would have a major positive effect on it through ensuring that development proposals are appropriately sited, designed and integrated with their surroundings.</p> <p>Mitigation</p> <p>Consider whether the structure and language used in DH3 and DH4 is consistent with the NPPF.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	++	++	++	++	++	++	++	++	++	++	++	++	++
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>Likely Significant Effects</p> <p>Strategic Policy DH1 requires development proposals to demonstrate good placemaking principles, including through providing a range and mix of high-quality, publicly accessible green spaces. This would increase high quality open space provision, resulting in a major positive effect on this SA objective.</p> <p>Strategic Policy DH2 requires development proposals to follow a street hierarchy which prioritises pedestrians and supports both the movements and place functions of streets. This would indirectly encourage development proposals to maximise links between open spaces and the built environment, as well as enhancing connectivity between open spaces. As such the policy could indirectly link and enhance open spaces, resulting in a minor positive effect on this SA objective.</p>	++	+	~	~	++	~	~	++	~	~	~	~	~	++

SA Objective	Commentary	Draft Policies											Cumulative Effect of the Draft Policies		
		Strategic Policy DH1: Local Character, Historic Environment and Place-Sensitive Design	Strategic Policy DH2: Creating Attractive and Safe Streets and Spaces	Policy DH3: Heritage and the Historic Environment	DH4: World Heritage Sites	DH5: Streets and the Public Realm	DH6 - Building Heights	DH7 - Density	DH8 - Amenity	DH9 - Noise Pollution	DH10 - Overheating	DH11 - Shopfronts		DH12 - Advertisements and Hoardings	DH13 - Telecommunications
	<p>Policy DH5 sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks and include high quality public realm. This would directly contribute to this SA objective through increasing access to, enhancing the quality of and encouraging greater connectivity between open spaces.</p> <p>Policy DH8 encourages the creation of attractive and useable open spaces. Through the promotion of open space provision to meet identified needs the policy would directly contribute to and have a major positive effect on this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</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>Likely Significant Effects</p> <p>Strategic Policy DH1 requires development proposals to demonstrate good placemaking principles, including through the minimisation of energy usage. As such the policy would contribute to and have a minor positive effect on this SA objective/</p> <p>Strategic Policy DH2 requires development proposals to follow a street hierarchy which prioritises pedestrians and supports both the movements and place functions of streets. This would ensure the accessibility of developments by active and sustainable travel modes, reducing car travels need and associated greenhouse gas emissions. Therefore the policy would indirectly have a minor positive effect on this SA objective</p> <p>Policy D4 sets out criteria to ensure that development proposals preserve or enhance recognised heritage assets, including their fabric. This would provide support for development proposals which seek to reduce flood risks on the historic environment and therefore could indirectly contribute to this SA objective.</p> <p>Policy DH5 sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and</p>	+	+	?	+	+	?	?	?	?	++	?	?	?	+

SA Objective	Commentary	Draft Policies											Cumulative Effect of the Draft Policies			
		Strategic Policy DH1: Local Character, Historic Environment and Place-Sensitive Design	Strategic Policy DH2: Creating Attractive and Safe Streets and Spaces	Policy DH3: Heritage and the Historic Environment	DH4: World Heritage Sites	DH5: Streets and the Public Realm	DH6 - Building Heights	DH7 - Density	DH8 - Amenity	DH9 - Noise Pollution	DH10 - Overheating	DH11 - Shopfronts		DH12 - Advertisements and Hoardings	DH13 - Telecommunications	
	<p>to open space networks and include high quality public realm. This would ensure the accessibility of developments by active and sustainable travel modes, reducing car travels need and associated greenhouse gas emissions. Therefore the policy would indirectly have a minor positive effect on this SA objective</p> <p>Policy DH10 requires development proposals to be designed to avoid overheating and excessive heat generation, as well as to minimise air conditioning needs. This would minimise energy usage, minimise urban heat island effects from building heating/cooling plant and enable developments to adapt to climate related temperature changes. As such the policy would directly contribute to and, at least in respect of climate change adaptation, have a major positive effect on this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>															
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p>Likely Significant Effects</p> <p>Strategic Policy DH1 requires development proposals to demonstrate good placemaking principles, including through providing a range and mix of high-quality, publicly accessible green spaces, which could also indirectly support increased levels of biodiversity through the creation of new habitats. As such the policy would contribute to and have a minor positive effect on this SA objective.</p> <p>Policy DH5 sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks and include high quality public realm. This would contribute to this SA objective as the provision of high quality and connected open spaces would generate new high quality and connected habitats which could support increased levels of biodiversity. Consequently this policy would have a major positive effect on this SA objective.</p> <p>Policy DH6 sets out criteria to assess the acceptability of tall building proposals, including specifically a requirement to avoid adverse impacts on</p>	+	++	?	?	?	+	?	++	?	?	?	?	?	?	+

SA Objective	Commentary	Draft Policies											Cumulative Effect of the Draft Policies		
		Strategic Policy DH1: Local Character, Historic Environment and Place-Sensitive Design	Strategic Policy DH2: Creating Attractive and Safe Streets and Spaces	Policy DH3: Heritage and the Historic Environment	DH4: World Heritage Sites	DH5: Streets and the Public Realm	DH6 - Building Heights	DH7 - Density	DH8 - Amenity	DH9 - Noise Pollution	DH10 - Overheating	DH11 - Shopfronts		DH12 - Advertisements and Hoardings	DH13 - Telecommunications
	<p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>														
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p>Likely Significant Effects</p> <p>Strategic Policies DH1 and DH2 and policies DH5 and DH8 all require development proposals to incorporate high-quality open spaces, which could reduce surface run-off and therefore reduce flood risks. Consequently these policies contribute to and would have a major positive effect on this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	++	++	~	~	++	~	~	++	~	~	~	~	~	++
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p>Likely Significant Effects</p> <p>Policy DH8 safeguards human 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 major positive effect on this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions</p>	~	~	~	~	~	~	~	++	~	~	~	~	~	0

SA of Draft Policies: Housing

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><u>Likely Significant Effects</u></p> <p>These policies include the housing target to 2025, a strategic affordable housing target of 50%, delivery mechanisms to meet these targets, quality standards for residential development proposals and criteria for specialist housing provision. The policies would result in the provision of suitable housing of all types to meet identified needs, in particular by resisting development that would involve a net loss of residential floorspace, ensuring sufficient delivery of affordable housing, prioritising the regeneration of existing housing estates, directing new housing to accessible locations and providing specialist housing where required (which could indirectly increase the availability of and or reduce land value pressures on general purpose housing for local residents). Consequently, in line with this SA objective, all of these policies would help to reduce poverty, social exclusion and fuel poverty.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>There is a degree of uncertainty regarding the interaction of the new Starter Homes requirement with the Council's 50% strategic target for affordable housing delivery.</p>	++	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><u>Likely Significant Effects</u></p> <p>Policies H1, H4, H5 and H6 direct residential developments, including for specialist housing, to areas with high accessibility, the potential to accommodate high densities (including areas with existing high densities), suitable infrastructure provision and open space. Policy H3 requires residential developments to protect existing and provide new amenity and play spaces. Through providing well designed residential developments in accessible locations these policies would improve access to local services, facilities and amenities, promote the development of a high quality public realm and ensure appropriate infrastructure provision.</p> <p>There is no specific relationship between Policy H2 and this SA objective.</p> <p><u>Mitigation</u></p> <p>Strategic Policy SG1 could include reference to the use of designing out crime principles..</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	~	++	++	++	++	++

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><u>Likely Significant Effects</u></p> <p>Policies H1, H4, H5 and H6 direct residential developments, including for specialist housing, to areas with high accessibility, suitable infrastructure provision and open space. Policy H3 requires residential developments to protect existing and provide new amenity and play spaces. Through providing well designed residential developments in accessible locations these policies would improve access to open space and public services, which could include health and leisure/community facilities.</p> <p>Policy H2 requires affordable housing to share the same level of amenities as private housing, which could contribute positively to health, e.g. in relation to issues associated with noise.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></p> <p>The policies would result in the provision of suitable housing of all types to meet identified needs, in particular by ensuring increased delivery of affordable housing and an appropriate range and mix of housing, prioritising the regeneration of existing housing estates, providing specialist housing and requiring good housing design standards to be met.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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>	++	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><u>Likely Significant Effects</u></p> <p>Policies H1, H4, H5 and 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.</p> <p>As policies H2 and H3 does 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	~	~	+	+	+	+

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
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><u>Likely Significant Effects</u></p> <p>The policies do not directly contribute to this SA objective. However:</p> <ul style="list-style-type: none"> • Policy H1 requires residential development proposals not to result in over-development, which would help to avoid pressure on education infrastructure and therefore indirectly have a minor positive effect on this SA objective. • Policy H5 provides a settled base for Gypsies and Travellers (G&Ts) which will enable any G&T children to access education facilities. • Policy H6 support the provision of student housing close to education institutions and within the town centre hierarchy, 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. <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	~	~	~	+	+	+

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></p> <p>Policy H1 requires the distribution and density levels of proposed housing to be aligned with the hierarchy and proximity of the nearby town centres, and also requires residential development proposals to optimise the use of land.</p> <p>Policy H6 directly contributes to this SA objective as it directs student accommodation to Town Centres, which would increase footfall and support their vitality. Policy 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.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	~	~	+	~	++	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><u>Likely Significant Effects</u></p> <p>Policy H1 requires all residential development proposals to be appropriate, high-quality, well-designed and sustainable, which in general terms aligns with this SA objective through promoting high quality design.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	+	~	~	~	~	~	0

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><u>Likely Significant Effects</u></p> <p>Policy H1 requires all residential development proposals to be appropriate, high-quality, well-designed and sustainable, which in general terms aligns with this SA objective through ensuring a placemaking approach to development.</p> <p>Policy H3 sets minimum open space standards for residential developments and safeguards existing amenity space, therefore directly contributing to this SA objective.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	+	~	++	~	~	~	0

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><u>Likely Significant Effects</u></p> <p>Strategic Policy 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>Policies H1 and H4 direct housing proposals to locations with good public transport accessibility and infrastructure, whilst policy H6 directs proposals for student accommodation to locations within the town centre hierarchy. 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.</p> <p>As drafted there is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	~	~	+	~	+	+

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u></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 H1 requires all residential development proposals to be appropriate, high-quality, 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 H3 requires residential proposals to protect existing amenity space, which could indirectly safeguard habitats and therefore support this objective.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	+	~	+	~	~	~	+

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy H1: Delivering Housing	H2: Affordable Housing	H3: Housing Standards and Quality	H4: Older Person and Vulnerable People Housing	H5: Gypsies and Travellers	H6: Student Housing	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><u>Likely Significant Effects</u></p> <p>These policies do not directly contribute to this SA objective. However, Strategic policy H1 and policy H4 direct housing proposals to locations with good public transport accessibility and infrastructure, whilst policy H6 directs proposals for student accommodation to locations within the town centre hierarchy. The proposed use of more sustainable 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>In addition Strategic Policy H1 requires all residential development proposals to be appropriate, high-quality, well-designed and sustainable, and directs housing to accessible locations including certain areas which are able to accommodate high density development. The policy therefore makes an indirect minor positive contribution to this SA objective by considering the relationship between proposals and the surrounding environment, including natural resources, and by directing developments to locations where they can be accommodated sustainably. However, policy H1 does not attempt to encourage residential development on brownfield sites.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>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><u>Uncertainties</u></p> <p>None required.</p>	+	~	~	+	~	+	+

SA of Draft Policies: Economy and Jobs

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><u>Likely Significant Effects</u></p> <p>At present the Local Plan does not make explicit the number of jobs to be provided over the period to 2031 by new development, although the London Plan sets out targets for the Opportunity Areas. 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 and aim to create to a environment for increased investment and job creation. For example, Strategic Policy EMP1 includes '<i>ensuring availability of a range of workspaces and unit sizes, including 'affordable workspace', start-up space, co-working space and 'grow-on' space as part of planning applications for mixed and employment uses</i>'. There is some uncertainty as later iterations of the Plan must be more specific in terms of the amount of employment to be provided and the contribution that development proposals will make to those.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++/?	++/?	++/?	++/?	++/?	++/?

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	
<p>2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services</p>	<p><u>Likely Significant Effects</u></p> <p>These policies do not directly contribute to this SA objective. However, Policy EMP5 requires the redevelopment or upgrading of designated employment areas to be appropriate to its surroundings and protect the amenity of surrounding properties, resulting in an indirect minor positive effect on this SA objective due to amenity protection from noise, vibration and pollution. There is no clear relationship the other Employment policies and this SA objective</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	+	0

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: 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><u>Likely Significant Effects</u></p> <p>Policy EMP5 allows for the redevelopment of sites in Local Industrial Locations provided that the proposed use is compatible. This could include residential development.</p> <p>No relationship with other objectives is identified.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>Uncertain if residential development would be compatible with Local Industrial Locations..</p>	~	~	~	~	+/?	0
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><u>Likely Significant Effects</u></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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><u>Likely Significant Effects</u></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, however they do not explicitly address issues regarding worklessness or barriers to employment within the local population.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></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><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: 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><u>Likely Significant Effects</u></p> <p>These policies do not address issues within this SA objective regarding density, townscape, cultural heritage or landscape matters. However, Strategic Policy EMP2 notes that Preferred Office Locations are suitable for employment uses with large floor plates and Policy EMP3 requires employment proposals outwith designated areas, Town Centres and Primary Routes would 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	+	+	~	~	0

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><u>Likely Significant Effects</u></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>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><u>Likely Significant Effects</u></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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	++	+	+	+	0

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	~	0
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><u>Likely Significant Effects</u></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><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	+	+	+	+	+

SA Objective	Commentary	Draft Policies					Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><u>Likely Significant Effects</u></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.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>It is assumed that in directing employment and light industrial developments to designated areas, Strategic Policy EMP1 has taken account of any known flood risks in these areas.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	0	0	0	0	0	0

SA of Draft Policies: Town Centres

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies	
		Strategic Policy TC1: The Town Centre Hierarchy	Strategic Policy TC2: Protecting and Enhancing Our Town Centres	Policy TC3: Protecting and Enhancing Retail in Our Town Centres	Policy TC4: Managing and Supporting Retail Outside of Our Town Centres	Policy TC5: Financial and Professional Services	Policy TC6: Food, Drink, Entertainment and the Night-time Economy	Policy TC7 Short stay Accommodation	Policy TC8 Offices Within the Town Centre	Policy TC9 Markets		
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p>Likely Significant Effects</p> <p>Strategic policy TC1 provides supports new community, cultural and social uses within the town centre hierarchy, specifically within District and neighbourhood Centres. This would concentrate such uses in accessible locations, which would indirectly help to reduce social exclusion and therefore contribute to this SA objective.</p> <p>Policy TC6 will make a minor positive contribution to this objective by managing the location of betting offices/shops, amusement centres and casinos.</p> <p>Policies TC2, TC3 and TC9 will also contribute to this objective by ensuring access to town centre related activities and healthy food, in the case of TC9. A significant positive effect is anticipated for TC2 and TC3 and a minor positive effect for TC9.</p> <p>There is no clear relationship between all other Town Centre policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>											
		++	++	++	~	~	+	~	~	+	++	

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy TC1: The Town Centre Hierarchy	Strategic Policy TC2: Protecting and Enhancing Our Town Centres	Policy TC3: Protecting and Enhancing Retail in Our Town Centres	Policy TC4: Managing and Supporting Retail Outside of Our Town Centres	Policy TC5: Financial and Professional Services	Policy TC6: Food, Drink, Entertainment and the Night-time Economy	Policy TC7 Short stay Accommodation	Policy TC8 Offices Within the Town Centre	Policy TC9 Markets	
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p>Likely Significant Effects</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.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	+	+	+	+	+	+	+	0
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p>Likely Significant Effects</p> <p>Policies TC5 and TC6 sets 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 with negative health externalities, resulting in a major positive effect on this SA objective. Policy DC9 makes a minor positive contribution by providing an opportunity to access healthy food.</p>	~	~	~	~	++	++	~	~	+	+

SA of Draft Policies: Community, Cultural and Social Facilities

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy CSF1: Supporting community, cultural and social facilities	Strategic Policy CSF2: Safeguarding Community Facilities	CSF3: Pre-school Provision	CSF4: Schools and Lifelong Learning	CSF5: Health and Medical Facilities	CSF6: Sports and Leisure	CSF7: Community Centres and Places of Worship	CSF8: Cultural Facilities	CSF.9: Public Houses	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><u>Likely Significant Effects</u></p> <p>Strategic Policy CSF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new, community 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>Strategic Policy CSF2 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. Where it can be robustly demonstrated that there is no longer a need for the specific facility, the policy requires that the site should be used for another community use, unless no longer needed and then affordable housing.</p> <p>Policies CSF3, CSF4 and CSF6 support the delivery of an expanded network of education, sport and leisure facilities whilst policy CSF7 provides support for appropriately located community facilities which enhance social integration. These policies would facilitate a range of learning and recreational opportunities which could both reduce social exclusion and increase integration, resulting in major positive effects on this SA objective.</p> <p>All other CSF polices encourage the provision of high quality social and cultural infrastructure, which would indirectly contribute to this SA objective through supporting opportunities for social cohesion and integration.</p> <p><u>Mitigation</u></p>	++	+	++	++	+	++	++	+	+	++

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy CSF1: Supporting community, cultural and social facilities	Strategic Policy CSF2: Safeguarding Community Facilities	CSF3: Pre-school Provision	CSF4: Schools and Lifelong Learning	CSF5: Health and Medical Facilities	CSF6: Sports and Leisure	CSF7: Community Centres and Places of Worship	CSF8: Cultural Facilities	CSF.9: Public Houses	
	<p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>										
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p>Likely Significant Effects</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. Strategic Policy CSF2 outlines where it can be robustly demonstrated that there is no longer a need for the specific facility, the site should be used for another community use, unless no longer needed when it should be used for affordable housing. Policy CSF8 also requires proposals for new cultural and social facilities to protect residential amenity, which contributes to this SA objective through avoiding adverse noise impacts on sensitive receptors.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified</p>	++	++	++	++	++	++	++	++	++	++
3. Health and wellbeing: Improve the	<p>Likely Significant Effects</p> <p>Strategic Policy CSF1 requires development proposals to contribute positively to maintaining</p>	++	++	~	~	++	++	+	+	+	++

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy CSF1: Supporting community, cultural and social facilities	Strategic Policy CSF2: Safeguarding Community Facilities	CSF3: Pre-school Provision	CSF4: Schools and Lifelong Learning	CSF5: Health and Medical Facilities	CSF6: Sports and Leisure	CSF7: Community Centres and Places of Worship	CSF8: Cultural Facilities	CSF.9: Public Houses	
cycling and walking.	<p>when accessing these facilities and services, resulting in a major positive effect on this SA objective.</p> <p>There is no clear relationship between Strategic Policy CSF 2 & Policy CSF9 and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></p> <p>Strategic Policy CSF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new, social infrastructure, 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>Policies CSF3 and CSF4 provides support for the delivery of an expanded network of pre-school, school, further & higher education facilities and upgraded Ideas Stores, whilst policy CSF7 provides support for appropriate new community facilities. 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>	++	~	++	++	~	~	++	~	~	++

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy CSF1: Supporting community, cultural and social facilities	Strategic Policy CSF2: Safeguarding Community Facilities	CSF3: Pre-school Provision	CSF4: Schools and Lifelong Learning	CSF5: Health and Medical Facilities	CSF6: Sports and Leisure	CSF7: Community Centres and Places of Worship	CSF8: Cultural Facilities	CSF.9: Public Houses	
	<p>There is no clear relationship between the other Community, Culture and Social Facilities policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>										
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p>Likely Significant Effects</p> <p>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.</p> <p>Policy CSF4 would directly contribute to this SA objective by increasing opportunities to access education and therefore improve skill levels, resulting in reduced worklessness and improved access to employment.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	+	+	++	+	+	+	+	+	
8. Economic Growth: Create and sustain	<p>Likely Significant Effects</p>	+	++	+	+	+	+	++	+	+	++

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy CSF1: Supporting community, cultural and social facilities	Strategic Policy CSF2: Safeguarding Community Facilities	CSF3: Pre-school Provision	CSF4: Schools and Lifelong Learning	CSF5: Health and Medical Facilities	CSF6: Sports and Leisure	CSF7: Community Centres and Places of Worship	CSF8: Cultural Facilities	CSF.9: Public Houses	
local economic growth across a range of sectors and business sizes.	<p>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 & culture).</p> <p>Strategic Policy CSF2 sets out criteria to protect existing community facilities whilst policy CSF7 requires proposals for new social and cultural facilities to consider the capacity of existing facilities and the need for the proposal. This would directly contribute to this SA objective through protecting the viability of existing facilities and thereby supporting a range of existing businesses.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>										
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></p> <p>Strategic Policy CSF1 directs 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.</p> <p>Policies CSF3 – CSF8 provide support for the delivery of new community facilities and social infrastructure in suitable and accessible locations. This would direct development proposals to locations within the town centre hierarchy and around public transport hubs,</p>	++	~	+	+	+	+	+	+	+	

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy CSF1: Supporting community, cultural and social facilities	Strategic Policy CSF2: Safeguarding Community Facilities	CSF3: Pre-school Provision	CSF4: Schools and Lifelong Learning	CSF5: Health and Medical Facilities	CSF6: Sports and Leisure	CSF7: Community Centres and Places of Worship	CSF8: Cultural Facilities	CSF9: Public Houses	
	<p>which would increase footfall within and enhance the vitality of Town Centres, resulting in an indirect positive effect on this SA objective.</p> <p>There is no clear relationship between Policy CSF9 and this SA objective.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>										
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p>Likely Significant Effects</p> <p>As drafted there is no clear relationship between the CSF policies and this SA objective.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	~	~	~	~	~	~	~	~	~	0
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>Likely Significant Effects</p> <p>Strategic Policy CSF2 sets out criteria to protect existing community facilities whilst policy CSF6 provides protection for existing pitches from development pressures and supports the development of new pitches. This would safeguard and enhance access to (albeit</p>	~	++	~	~	~	++	~	~	~	+

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy CSF1: Supporting community, cultural and social facilities	Strategic Policy CSF2: Safeguarding Community Facilities	CSF3: Pre-school Provision	CSF4: Schools and Lifelong Learning	CSF5: Health and Medical Facilities	CSF6: Sports and Leisure	CSF7: Community Centres and Places of Worship	CSF8: Cultural Facilities	CSF.9: Public Houses	
	<p><u>Uncertainties</u></p> <p>None identified.</p>										
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><u>Likely Significant Effects</u></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	~	~	~	~		

SA of Draft Policies: Open Spaces and Water Spaces

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy OS1: Creating a Network of Open Spaces	Strategic Policy OS2: Enhancing Water Spaces	OS3: Open Space and Green Grid	OS4: Protecting the Blue Ribbon Network	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><u>Likely Significant Effects</u></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 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><u>Likely Significant Effects</u></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><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None required.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy OS1: Creating a Network of Open Spaces	Strategic Policy OS2: Enhancing Water Spaces	OS3: Open Space and Green Grid	OS4: Protecting the Blue Ribbon Network	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><u>Likely Significant Effects</u></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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></p> <p>There is potential for these policies to work in synergy with the housing policies to contribute towards this objective, resulting in a significant positive effect. Policy OS2 also provides criteria relating to the provision of residential moorings.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy OS1: Creating a Network of Open Spaces	Strategic Policy OS2: Enhancing Water Spaces	OS3: Open Space and Green Grid	OS4: Protecting the Blue Ribbon Network	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><u>Likely Significant Effects</u></p> <p>Strategic Policy OS2 and Policy OS4 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 Blue Ribbon Network. 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>Strategic Policy OS1 and Policy OS3 require development to contribute to the Green Grid and provide well connected open space. As such, the policy would directly contribute to this SA objective resulting in a significant positive effect.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></p> <p>There is no clear relationship between these policies and this SA objective. However, it should be noted that open spaces can provide suitable environments for some learning activities, so their enhancement through Strategic Policy OS1 and Policy OS3 has the potential to deliver beneficial outcomes in relation to this SA objective, resulting in a minor positive effect.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	~	+	~	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy OS1: Creating a Network of Open Spaces	Strategic Policy OS2: Enhancing Water Spaces	OS3: Open Space and Green Grid	OS4: Protecting the Blue Ribbon Network	
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><u>Likely Significant Effects</u></p> <p>The requirements within Strategic Policy OS2 and Policy OS4 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 Blue Ribbon Network, 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 clear relationship between these policies and this SA objective. There is also no clear relationship between the other Open Space policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><u>Likely Significant Effects</u></p> <p>The requirements within Strategic Policy OS2 and Policy OS4 for development proposals to protect navigation and not to compromise other water uses would safeguard existing economic activity within existing water spaces and the Blue Ribbon Network, 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 within them; therefore on balance there is no clear relationship between these policies and this SA objective. There is also no clear relationship between the other Open Space policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy OS1: Creating a Network of Open Spaces	Strategic Policy OS2: Enhancing Water Spaces	OS3: Open Space and Green Grid	OS4: Protecting the Blue Ribbon Network	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	+	+	+	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><u>Likely Significant Effects</u></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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy OS1: Creating a Network of Open Spaces	Strategic Policy OS2: Enhancing Water Spaces	OS3: Open Space and Green Grid	OS4: Protecting the Blue Ribbon Network	
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><u>Likely Significant Effects</u></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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified/</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></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 OS4 requires development proposals to be set back from the Blue Ribbon Network and other water spaces to mitigate flood risks. This would directly contribute to climate change adaptation and this SA objective through reducing the exposure of new developments to climate related fluvial flood risks.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	+	+	++	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy OS1: Creating a Network of Open Spaces	Strategic Policy OS2: Enhancing Water Spaces	OS3: Open Space and Green Grid	OS4: Protecting the Blue Ribbon Network	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u></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 OS3 and OS4 specifically require development proposals not to adversely impact on the biodiversity value of open and water spaces. 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy OS1: Creating a Network of Open Spaces	Strategic Policy OS2: Enhancing Water Spaces	OS3: Open Space and Green Grid	OS4: Protecting the Blue Ribbon Network	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><u>Likely Significant Effects</u></p> <p>Strategic Policy OS1 and Policy OS3 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 help to improve air quality (through the aerobic effects of additional tree planting), resulting in a positive effect on this SA objective. In addition the support for the temporary greening of vacant land within Policy OS3 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 OS2 and OS4 include the requirement to improve the ecological and biodiversity value of water and will therefore make a significant positive contribution to the achievement of this objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None required.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy OS1: Creating a Network of Open Spaces	Strategic Policy OS2: Enhancing Water Spaces	OS3: Open Space and Green Grid	OS4: Protecting the Blue Ribbon Network	
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><u>Likely Significant Effects</u></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 OS4 requires development proposals to be set back from the Blue Ribbon Network and other water spaces to mitigate flood risks. This would directly contribute to this SA objective through reducing the exposure of new developments to fluvial flood risks.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	+	+	++	+
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><u>Likely Significant Effects</u></p> <p>As set out in relation to SA objective 14, the protection, development and enhancement of open spaces requires by Strategic Policy OS1 and Policy OS3 would help to improve soil quality, whilst the support provided in Policy OS3 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 the other Open Space policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	~	++	~	++

SA of Draft Policies: Environmental Sustainability

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies	
		Strategic Policy ES1: Protect and Enhance our Environment	Policy ES2: Improving Air Quality	Policy ES3: Urban Greening and Biodiversity	Policy ES4: Reducing Flood Risk	Policy ES5: Sustainable Water Management	Policy ¹ ES6a: Achieving a Zero Carbon Borough	Policy ES6b: Contaminated land and development and storage of hazardous substances	Policy ES7: Waste Management	Policy ES8: Waste Management Capacity		
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p>Likely Significant Effects</p> <p>Strategic Policy ES1 and Policy ES3 require all developments to protect and enhance the natural environment, and Strategic Policy 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 directly contributes to this SA objective.</p> <p>Policy ES2 requires all development proposals to at least meet 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 'b' of policy E6a requires the feasibility of connecting to or establishing decentralised energy systems within development proposals to be considered. 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.</p> <p>There is no clear relationship between policies ES4, ES5, ES6b, ES7 & ES8 and this SA objective.</p> <p>Mitigation None identified.</p> <p>Assumptions None required.</p> <p>Uncertainties None identified.</p>	++	+	++	~	~	+	~	~	~	+	
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p>Likely Significant Effects</p> <p>Strategic Policy 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>	++	++	~	+	~	~	~	~	~	~	+

¹ Note that the Draft Local Plan that was assessed had two policies numbered as E6 so we have referred to these as E6a and E6b

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy ES1: Protect and Enhance our Environment	Policy ES2: Improving Air Quality	Policy ES3: Urban Greening and Biodiversity	Policy ES4: Reducing Flood Risk	Policy ES5: Sustainable Water Management	Policy ¹ ES6a: Achieving a Zero Carbon Borough	Policy ES6b: Contaminated land and development and storage of hazardous substances	Policy ES7: Waste Management	Policy ES8: Waste Management Capacity	
	<p>Policy 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 ES4 sets out a pro-active approach to flood risk management which promote liveable and safe areas.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>										
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p>Likely Significant Effects</p> <p>Strategic Policy ES1 identifies the need through biodiversity protection and enhancement to improve opportunities to experience nature, in particular in deficient areas, and 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 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 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 active travel and recreational activities. As such the policy directly contributes to this SA objective.</p> <p>Strategic Policy ES1 and Policy ES4 set out a pro-active 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 policy could indirectly help to safeguard mental health and improve people's physical health and quality of life. Considered in isolation Policy</p>	++	++	++	+	~	~	++	+	+	++

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy ES1: Protect and Enhance our Environment	Policy ES2: Improving Air Quality	Policy ES3: Urban Greening and Biodiversity	Policy ES4: Reducing Flood Risk	Policy ES5: Sustainable Water Management	Policy ¹ ES6a: Achieving a Zero Carbon Borough	Policy ES6b: Contaminated land and development and storage of hazardous substances	Policy ES7: Waste Management	Policy ES8: Waste Management Capacity	
	<p>quality and, through design, reduce exposure to air pollution.</p> <p>Strategic Policy ES1 and Policy ES3 require all developments to protect and enhance biodiversity, which would include protecting and improving soil resources.</p> <p>Strategic Policy ES1 and Policy ES4 set out a proactive approach to flood risk management, which would ensure that development proposals contribute to sustainable drainage practices.</p> <p>Policy ES5 requires development proposals to minimise water consumption and pressure on the combined sewer network, thereby ensuring the minimisation of water use.</p> <p>Policies ES7 and ES8 sets out a strategy and development management criteria to provide waste management facilities and minimise residual waste generation from new developments, thereby encouraging the growth of the circular economy.</p> <p>Policy ES6b 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 no clear relationship between Policy S6a and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>										
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p>Likely Significant Effects</p> <p>Strategic Policy ES1 and Policy ES4 set out a proactive approach to flood risk management, which directs development away from flood risk areas and therefore minimises flood risks to people and property. Policy ES4 also sets out criteria to ensure surface run-off is kept within acceptable limits, especially within Critical Drainage Areas, and encourage 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 ES5 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>Mitigation</p>	++	~	~	++	+	~	~	~	~	+

SA Objective	Commentary	Draft Policies									Cumulative Effect of the Draft Policies
		Strategic Policy ES1: Protect and Enhance our Environment	Policy ES2: Improving Air Quality	Policy ES3: Urban Greening and Biodiversity	Policy ES4: Reducing Flood Risk	Policy ES5: Sustainable Water Management	Policy ¹ ES6a: Achieving a Zero Carbon Borough	Policy ES6b: Contaminated land and development and storage of hazardous substances	Policy ES7: Waste Management	Policy ES8: Waste Management Capacity	
	<p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>										
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p>Likely Significant Effects</p> <p>Strategic Policy ES1 sets the context for ES6b on contaminated land, making a minor positive contribution to this objective.</p> <p>Policy ES6b 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>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	+	~	~	~	~	~	++	~	~	+

SA of Draft Policies: Transport & Connectivity

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><u>Likely Significant Effects</u></p> <p>Strategic Policy TRN1 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><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><u>Likely Significant Effects</u></p> <p>These policies require development proposals to safeguard, development and enhance the Borough's transport network, in particular the public transport system, and Strategic Policy TRN1 also directs high trip generating developments to highly accessible locations. The policies would therefore directly contribute to this SA 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><u>Likely Significant Effects</u></p> <p>Strategic Policy TRN1 directly contributes to this SA objective through directing high trip generating developments to highly accessible location, 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 TRN2 sets out criteria to prevent unacceptable adverse traffic impacts, which could otherwise increase local air pollution and cause/exacerbate health problems.</p> <p>Policy TRN3 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 TRN5 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	+	++	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
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><u>Likely Significant Effects</u></p> <p>Strategic Policy TRN1 contribute to this objective by helping to ensure that public transport is well related to development, including housing development. Policy TRN3 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>.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	~	+	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><u>Likely Significant Effects</u></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. Strategic Policy TRN1 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
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><u>Likely Significant Effects</u></p> <p>These policies would not directly contribute to this SA objective. However, Strategic Policy TRN1 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>.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	+	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><u>Likely Significant Effects</u></p> <p>These policies would not directly contribute to this SA objective. However, Strategic Policy TRN1 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>.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>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><u>Uncertainties</u></p> <p>None identified.</p>	+	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><u>Likely Significant Effects</u></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 Strategic Policy TRN1, 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></p> <p>Strategic Policy TRN1 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, development 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> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	+	+	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><u>Likely Significant Effects</u></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><u>Likely Significant Effects</u></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><u>Likely Significant Effects</u></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 Strategic Policy TRN1 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	++	++	++	++	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><u>Likely Significant Effects</u></p> <p>These policies require development proposals to safeguard, development and enhance the Borough's transport network, especially the public transport system. In particular Policy TRN2 sets out criteria to prevent unacceptable adverse traffic impacts, 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><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+	++	+	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		Strategic Policy TRN1: Sustainable Travel	Development Management TRN2: Assessing the impacts on the transport network	TRN3: Parking and permit-free	Policy TRN4: Sustainable Transportation of Freight	
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><u>Likely Significant Effects</u></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><u>Likely Significant Effects</u></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~	~	~	~	0

SA of Draft Policy on Planning Contributions

SA Objective	Commentary	Policy
		Strategic Policy CSF1: Supporting community, cultural and social facilities
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><u>Likely Significant Effects</u></p> <p>Planning 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.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><u>Likely Significant Effects</u></p> <p>Planning 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.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified</p>	+
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><u>Likely Significant Effects</u></p> <p>Planning 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.</p> <p><u>Mitigation</u></p>	+

SA Objective	Commentary	Policy
		Strategic Policy CSF1: Supporting community, cultural and social facilities
	<p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></p> <p>The provision of affordable housing through S.106 contributions will contribute to this objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+
6. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><u>Likely Significant Effects</u></p> <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.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+

SA Objective	Commentary	Policy
		Strategic Policy CSF1: Supporting community, cultural and social 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><u>Likely Significant Effects</u></p> <p>The use of CIL to contribute to public education facilities and employment and training facilities will contribute to this objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><u>Likely Significant Effects</u></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.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><u>Likely Significant Effects</u></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.</p> <p>.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p>	+

SA Objective	Commentary	Policy
		Strategic Policy CSF1: Supporting community, cultural and social facilities
	<p><u>Uncertainties</u></p> <p>None identified.</p>	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></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> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><u>Likely Significant Effects</u></p> <p>As drafted there is no clear relationship between the policy and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	~
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><u>Likely Significant Effects</u></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.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p>	+

SA Objective	Commentary	Policy
		Strategic Policy CSF1: Supporting community, cultural and social facilities
	<p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></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.</p> <p><u>Mitigation</u></p> <p>None identified</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></p> <p>None identified.</p>	+
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u></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. These measures will contribute towards this objective.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p> <p><u>Uncertainties</u></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><u>Likely Significant Effects</u></p> <p>There is no clear relationship between the policy and this SA objective.</p>	~

SA Objective	Commentary	Policy
		Strategic Policy CSF1: Supporting community, cultural and social facilities
	<p><u>Mitigation</u> None identified.</p> <p><u>Assumptions</u> None identified.</p> <p><u>Uncertainties</u> None identified.</p>	
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><u>Likely Significant Effects</u> CIL contributions will be used for strategic flood defences and therefore contribute to this objective. .</p> <p><u>Mitigation</u> None required.</p> <p><u>Assumptions</u> None identified</p> <p><u>Uncertainties</u> None identified.</p>	+
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><u>Likely Significant Effects</u> There is no clear relationship between the policy and this SA objective.</p> <p><u>Mitigation</u> None identified.</p> <p><u>Assumptions</u> None identified.</p> <p><u>Uncertainties</u> None identified.</p>	~

Site Name:	Ailsa Street		
Site Area (ha):	5.76		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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.		
2. Liveability: 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 site allocation notes that Poplar Library and Bromley Hall lie within the site and requires development proposals to protect and enhance designated heritage assets.
	+ 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.		
3. Health and wellbeing: 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	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)		

Site Name:	Ailsa Street		
Site Area (ha):	5.76		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	-- 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.	++ 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. Transport and mobility: 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 1a but proportion in PTAL 2 and 1b. Development Principles for the site include provision for a bridge over the River Lea and to increase permeability through the site, this may improve the PTAL.
	+ 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. 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. The site allocation notes that this site has been identified as suitable for the provision of a new 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 Name:	Ailsa Street		
Site Area (ha):	5.76		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		No employment uses allocated. There is employment on site, therefore other Local Plan policies will seek to re-provide some level of employment provision.
	+ 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 Employment Location. The site allocation does not 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	
	- 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).		The site lies outside of a town centre and is not proposed for main town centre uses.
	+ Site of less than 5ha within a town centre that includes main town centre uses.		
	0 Site outside of a town centre and other criteria do not apply.	0	

Site Name:	Ailsa Street		
Site Area (ha):	5.76		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- Site of less than 5ha outside of either a town centre or edge of centre ¹ that includes main town centre uses. ²		
	-- 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.		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 proposed site allocations refers to the need for development proposals to protect and enhance designated heritage assets.
	+ 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.		
	? 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.	++	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.		
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.		

¹ 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.

² 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:	Ailsa Street		
Site Area (ha):	5.76		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 Score all sites as neutral.	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
	+ 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	
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Across FZ2 & 3
	+ 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	--	

Site Name:	Ailsa Street		
Site Area (ha):	5.76		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	? 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.		
16. Contaminated Land: 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 5.74ha of 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).		

Site Name:	Aspen Way		
Site Area (ha):	2.89		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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.		
2. Liveability: 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.		Only open space, captured in IIA objective 11, is proposed.
	+ 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.		
3. Health and wellbeing: 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	
	- Not used (on basis that proposed development site would not lead to net loss of community facilities)		

Site Name:	Aspen Way		
Site Area (ha):	2.89		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	-- 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.	++ 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. Transport and mobility: 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 4 & 3. The development guidelines for the site identify the potential to create walking and cycling connections across Aspen Way which could improve the current PTA rating.
	+ 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. 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.		No new schools 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.	0	

Site Name:	Aspen Way		
Site Area (ha):	2.89		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		No employment uses proposed
	+ 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 lies north of (i.e. outside) Canary Wharf Preferred Office Location and west of Local Industrial Location. The site allocation does not include employment land uses.
	+ Site would provide employment in a LEL 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).		No main town centre uses proposed, however site is within 300m of 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.		
	0 Site outside of a town centre and other criteria do not apply.	0/?	

Site Name:	Aspen Way		
Site Area (ha):	2.89		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- Site of less than 5ha outside of either a town centre or edge of centre ³ that includes main town centre uses. ⁴		
	-- 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.		Partially within an Archaeological Priority Area. No other designated heritage assets affected.
	+ 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.		
	? 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.	++	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.		
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.		

³ 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.

⁴ 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):	2.89		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 Score all sites as neutral.	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).		No natural heritage 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	
	- 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	
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Across FZ2 & 3
	+ 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	--	

Site Name:	Aspen Way		
Site Area (ha):	2.89		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	? 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.		
16. Contaminated Land: 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).		

Site Name:	Billingsgate Market		
Site Area (ha):	5.74		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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.
	+ 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.		
3. Health and wellbeing: 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:	Billingsgate Market		
Site Area (ha):	5.74		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.	++	New Primary or Secondary School proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	Billingsgate Market		
Site Area (ha):	5.74		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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.		No employment uses proposed
	+ 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).		1.23 ha of development in Canary Wharf Preferred Office Location however no employment use is proposed. Likely loss of employment from relocation/loss of Billingsgate Market and residential development in POF.
	+ Site would provide employment in a LEL 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.	--	

Site Name:	Billingsgate Market		
Site Area (ha):	5.74		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	? 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).		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.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ⁵ that includes main town centre uses. ⁶		
	-- 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.		Contains Statutory Listed Building LB732 (Grade II).
	+ 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.	--/?	
	? 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 is assumed that open space to meet onsite needs would be provided in accordance with relevant planning policies.
	+ 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.		

⁵ 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.

⁶ 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	Score	Commentary
	- 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	
	- 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, 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).		
	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	

Site Name:	Billingsgate Market		
Site Area (ha):	5.74		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Across FZ2 & 3
	+ 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.		
16. Contaminated Land: 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).		

Site Name:	Bishopsgate Goods Yard		
Site Area (ha):	4.46		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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.		Idea Store
	+ 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. Health and wellbeing: 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:	Bishopsgate Goods Yard		
Site Area (ha):	4.46		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: 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 6b, 6a & 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.		No new schools proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	Bishopsgate Goods Yard		
Site Area (ha):	4.46		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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. 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.		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.		
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 allocation would provide employment within the City Fringe
	+ Site would provide employment in a LEL 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.		

Site Name:	Bishopsgate Goods Yard		
Site Area (ha):	4.46		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	? 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).		0.06ha of development out of 4.46ha total in town centre 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.
	+ Site of less than 5ha within a town centre that includes main town centre uses.		
	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 ⁷ that includes main town centre uses. ⁸		
	-- 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.		Contains Statutory Listed Building LB910 (Grade II) and partially within the Fournier Street CA.
	+ 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.	--/?	
	? 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.	++	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.		

⁷ 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.

⁸ 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:	Bishopsgate Goods Yard		
Site Area (ha):	4.46		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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).		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).		
	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	

Site Name:	Bishopsgate Goods Yard		
Site Area (ha):	4.46		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: 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.		
16. Contaminated Land: 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).		

Site Name:	Bow Common Gas Works		
Site Area (ha):	3.94		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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.		
2. Liveability: 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 schools 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	
	- 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. Health and wellbeing: 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:	Bow Common Gas Works		
Site Area (ha):	3.94		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		Primarily within PTAL 2 but part of the site is within PTAL 4 and 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.	++	New Primary or Secondary School proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	Bow Common Gas Works		
Site Area (ha):	3.94		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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.		No employment uses proposed. Residential development would replace onsite warehousing and could lead to loss of employment.
	+ 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 within the City Fringe. Proposed residential development would replace onsite warehousing (employment) use in the absence of mitigation.
	+ Site would provide employment in a LEL 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.	--	

Site Name:	Bow Common Gas Works		
Site Area (ha):	3.94		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	? 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.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ⁹ that includes main town centre uses. ¹⁰		
	-- 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.		Locally Listed building with the site:
	+ 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.		
	? 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.	++	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.		

⁹ 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.

¹⁰ 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:	Bow Common Gas Works		
Site Area (ha):	3.94		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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).		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
	+ 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	

Site Name:	Bow Common Gas Works		
Site Area (ha):	3.94		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: 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		
	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.		
16. Contaminated Land: 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 3.94ha of brownfield land. 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.
	+ 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:	Chrisp Street Market		
Site Area (ha):	3.62		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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.		
2. Liveability: 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
	+ 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.		No new health facilities proposed on site.

Site Name:	Chrisp Street Market		
Site Area (ha):	3.62		
Sustainability Objective	Basis for appraising sites	Score	Commentary
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	+ Site safeguards an existing health facility.		
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: 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 4 & 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.		
6. Education: Increase and improve the provision of and access to childcare,	++ Site includes provision of a new school that will meet wider needs.		No new schools proposed

Site Name:	Chrisp Street Market		
Site Area (ha):	3.62		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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.	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. 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.		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.
	+ 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 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, albeit the site is not within a designated employment location. The proposal would create employment but due to scale and type of proposed uses (e.g. local convenience) would be unlikely to impact on existing employment locations.
	+ Site would provide employment in a LELLocal Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	0	
	- Development would result in the loss of employment in a LEL		

Site Name:	Chrisp Street Market		
Site Area (ha):	3.62		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	-- 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).		3.09ha of development out of 3.62ha total in town centre - Chrisp 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.	+	
	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 ¹¹ that includes main town centre uses. ¹²		
	-- 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 lies within Lansbury Conservation Area but does not contain any listed buildings.
	+ 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.		
	? 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 as the proposal includes residential development it is assumed that open space to meet
	+ Site includes open space provision but only sufficient to meet the needs of the development.	+/?	

¹¹ 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.

¹² 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 Market		
Site Area (ha):	3.62		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 Site or associated use does not generate a need for open space.		onsite needs would be provided in accordance with relevant planning policies.
	- 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	
	- 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).		No natural heritage 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	
	- 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	

Site Name:	Chrisp Street Market		
Site Area (ha):	3.62		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: 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		
	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.		
16. Contaminated Land: 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).		

Site Name:	Clove Crescent		
Site Area (ha):	6.12		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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 except schools, health care facility and open space, all of which relate to other IIA objectives.
	+ 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.		
3. Health and wellbeing: 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.		

Site Name:	Clove Crescent		
Site Area (ha):	6.12		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		Primarily within PTAL 3 but part of the site is within 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.	++	New Primary or Secondary School proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	Clove Crescent		
Site Area (ha):	6.12		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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.		The proposed site allocation includes employment uses and notes that development proposals would need to be employment led.
	+ 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 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).		6.09 ha of development in Blackwall Local Employment Location
	+ Site would provide employment in a LEL 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.		

Site Name:	Clove Crescent		
Site Area (ha):	6.12		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	? 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.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ¹³ that includes main town centre uses. ¹⁴		
	-- 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.		Contains the following statutory Listed Buildings; LB239 (Grade II), LB427 (Grade II), East India Dock House (Grade II*), is wholly within an Archaeological Priority Area and partially within the Limehouse Cut Conservation Area.
	+ 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.	--/?	
	? 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.	++	Includes strategic scale open space provision
	+ Site includes open space provision but only sufficient to meet the needs of the development.		

¹³ 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.

¹⁴ 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:	Clove Crescent		
Site Area (ha):	6.12		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	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	
	- 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).		Overlaps Saffron Pond SINC and within 90m of Robin Hood Gardens SINC.
	+ 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).		

Site Name:	Clove Crescent		
Site Area (ha):	6.12		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3.
	+ 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.		
16. Contaminated Land: 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).		

Site Name:	Crossharbour District Centre		
Site Area (ha):	6.06		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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.		New Idea Store
	+ 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. Health and wellbeing: 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.		

Site Name:	Crossharbour District Centre		
Site Area (ha):	6.06		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	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.	++ 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. Transport and mobility: 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 4 & 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.	++	New Primary School proposed.
	+ Site safeguards/expands an existing school on site.		

Site Name:	Crossharbour District Centre		
Site Area (ha):	6.06		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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.		The proposed site allocation does not include employment uses. However, planning permission PA/11/03670 includes retail/commercial uses which would generate employment
	+ 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 allocation would not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	Crossharbour District Centre		
Site Area (ha):	6.06		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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).	++/?	4.87ha of development out of 6.06ha total in town centre Crossharbour district centre. Site area exceeds 5ha including 6.06ha in a designated Town 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.
	+ Site of less than 5ha within a town centre that includes main town centre uses.		
	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 ¹⁵ that includes main town centre uses. ¹⁶		
	-- 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.		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	
	- 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.		
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 as the proposal includes residential development it is assumed that open space to meet onsite needs would be provided in
	+ 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.		

¹⁵ 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.

¹⁶ 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:	Crossharbour District Centre		
Site Area (ha):	6.06		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- Development would result in the loss of open space but partial compensatory land is provided elsewhere.		accordance with relevant planning policies.
	-- 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	
	- 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 Mudchute Park Farm LNR and Mudchute Park and Farm SINC, within 25m of Millwall and West India Docks SINC
	+ 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	

Site Name:	Crossharbour District Centre		
Site Area (ha):	6.06		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3
	+ 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.		
16. Contaminated Land: 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).		

Site Name:	Hercules Wharf		
Site Area (ha):	2.57		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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 except open space, which relate to other IIA objectives.
	+ 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.		
3. Health and wellbeing: 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.		

Site Name:	Hercules Wharf		
Site Area (ha):	2.57		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: 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 1a & 1b
	+ 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. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.		No new schools proposed.
	+ Site safeguards/expands an existing school on site.		

Site Name:	Hercules Wharf		
Site Area (ha):	2.57		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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. 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.		No employment uses proposed.
	+ 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 allocation would not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	Hercules Wharf		
Site Area (ha):	2.57		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ¹⁷ that includes main town centre uses. ¹⁸	-	
	-- 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.		Contains Statutory Listed Building LB737 (Grade II) and wholly within an APA.
	+ 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.	--	
	? 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.	++	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.		

¹⁷ 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.

¹⁸ 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:	Hercules Wharf		
Site Area (ha):	2.57		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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 and within 13m of East India Dock Basin.
	+ 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	

Site Name:	Hercules Wharf		
Site Area (ha):	2.57		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: 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		
	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.		
16. Contaminated Land: 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 2.56ha of 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).		

Site Name:		Leven Road Gas Works		
Site Area (ha):		8.56		
Sustainability Objective	Basis for appraising sites	Score	Commentary	
1. Equality: 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.			
2. Liveability: 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 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		
	- 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. Health and wellbeing: 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:	Leven Road Gas Works		
Site Area (ha):	8.56		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: 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 1a but part of the site is within PTAL 2 & 1a
	+ 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. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.	++	New Primary or Secondary School proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	Leven Road Gas Works		
Site Area (ha):	8.56		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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.		No employment uses proposed. Residential development would replace onsite warehousing and could lead to loss of employment out with designated employment area in the absence of mitigation.
	+ 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 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 would not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	Leven Road Gas Works		
Site Area (ha):	8.56		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ¹⁹ that includes main town centre uses. ²⁰		
	-- 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 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.		
	- 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.		
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 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.		

¹⁹ 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.

²⁰ 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:	Leven Road Gas Works		
Site Area (ha):	8.56		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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
	+ 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	

Site Name:	Leven Road Gas Works		
Site Area (ha):	8.56		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3
	+ 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.		
16. Contaminated Land: 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 8.55ha of 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).		

Site Name:	Limeharbour		
Site Area (ha):	5.07		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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 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	
	- 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. Health and wellbeing: 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:	Limeharbour		
Site Area (ha):	5.07		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: 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 4 & 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.	++	New Primary or Secondary School proposed.
	+ Site safeguards/expands an existing school on site.		

Site Name:	Limeharbour		
Site Area (ha):	5.07		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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.		No employment uses allocated.
	+ 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 allocation would not provide employment or impact on existing defined employment areas. However, the proposed allocation would result in the loss of economic activity from an existing office and industrial site.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	Limeharbour		
Site Area (ha):	5.07		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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 is within the Tower Hamlets Activity Area but not allocated for town centre uses.
	+ Site of less than 5ha within a town centre that includes main town centre uses.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ²¹ that includes main town centre uses. ²²		
	-- 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.		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	
	- 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.		
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 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.		

²¹ 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.

²² 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):	5.07		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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.
	+ 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	

Site Name:	Limeharbour		
Site Area (ha):	5.07		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3.
	+ 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.		
16. Contaminated Land: 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 1.41ha of 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).		

Site Name:	Marian Place Gas Works and The Oval		
Site Area (ha):	4.41		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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.		
2. Liveability: 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 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	
	- 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.

Site Name:	Marian Place Gas Works and The Oval		
Site Area (ha):	4.41		
Sustainability Objective	Basis for appraising sites	Score	Commentary
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	+ Site safeguards an existing health facility.		
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		Primarily within PTAL 4 but part of the site is within PTAL 5 & 6a.
	+ 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. Education: Increase and improve the provision of and access to childcare,	++ Site includes provision of a new school that will meet wider needs.	++	New Primary School proposed

Site Name:	Marian Place Gas Works and The Oval		
Site Area (ha):	4.41		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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.		
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.		No employment uses proposed
	+ 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 allocation would not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	0	
	- Development would result in the loss of employment in a LEL		

Site Name:	Marian Place Gas Works and The Oval		
Site Area (ha):	4.41		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	-- 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, 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.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ²³ that includes main town centre uses. ²⁴		
	-- 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 LB869 (Grade II) and is mostly within the Hackney Road & Regents Canal Conservation Area.
	+ 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.	--/?	
	? Score uncertain if site is within 400m of a Conservation area or designated site.		
	++ 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.

²³ 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.

²⁴ 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:	Marian Place Gas Works and The Oval		
Site Area (ha):	4.41		
Sustainability Objective	Basis for appraising sites	Score	Commentary
11. Open space: 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.		
	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	
	- 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 London's Canals SINC
	+ 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,	++ Not used (evaluation of any positive effects requires a level of detail absent at this stage of site appraisal and assessment).		

Site Name:	Marian Place Gas Works and The Oval		
Site Area (ha):	4.41		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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).		
	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.		
15. Flood risk reduction and management: 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.		
16. Contaminated Land: 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 3.78ha of 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).		

Site Name:	Marsh Wall East		
Site Area (ha):	3.61		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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, health facility 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	
	- 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. Health and wellbeing: 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.		

Site Name:	Marsh Wall East		
Site Area (ha):	3.61		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	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.	++ 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. Transport and mobility: 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 4 & 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.		New Primary School proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	Marsh Wall East		
Site Area (ha):	3.61		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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. 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.		No employment uses proposed
	+ 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 allocation would not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	Marsh Wall East		
Site Area (ha):	3.61		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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 falls within the Tower Hamlets Activity Area but not allocated for retail use.
	+ Site of less than 5ha within a town centre that includes main town centre uses.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ²⁵ that includes main town centre uses. ²⁶		
	-- 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.		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	
	- 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.		
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 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.		

²⁵ 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.

²⁶ 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):	3.61		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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.
	+ 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	

Site Name:	Marsh Wall East		
Site Area (ha):	3.61		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3
	+ 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.		
16. Contaminated Land: 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 2.96ha of 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).		

Site Name:	Marsh Wall West		
Site Area (ha):	6.83		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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, health facility 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	
	- 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. Health and wellbeing: 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.		

Site Name:	Marsh Wall West		
Site Area (ha):	6.83		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	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.	++ 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. Transport and mobility: 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 4 & 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.	++	New Primary School proposed.
	+ Site safeguards/expands an existing school on site.		

Site Name:	Marsh Wall West		
Site Area (ha):	6.83		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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.		Not allocated for employment use. However, planning permission PA/15/02671 includes employment uses (ground floor retail).
	+ 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 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 would not itself provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	Marsh Wall West		
Site Area (ha):	6.83		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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 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.		
	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 ²⁷ that includes main town centre uses. ²⁸		
	-- 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.		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	
	- 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.		
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 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.		

²⁷ 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.

²⁸ 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 West		
Site Area (ha):	6.83		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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.
	+ 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	

Site Name:	Marsh Wall West		
Site Area (ha):	6.83		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3
	+ 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.		
16. Contaminated Land: 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 2.05ha of 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).		

Site Name:	Millharbour		
Site Area (ha):	5.05		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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.		
2. Liveability: 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, health facility 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	
	- 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.	++	Health facility proposed

Site Name:	Millharbour		
Site Area (ha):	5.05		
Sustainability Objective	Basis for appraising sites	Score	Commentary
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	+ 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. Housing: 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. Transport and mobility: 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 4 & 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:	Millharbour		
Site Area (ha):	5.05		
Sustainability Objective	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.	++ 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.		No employment uses proposed, however 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 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 not within a SIL, POL or LEL.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	0	

Site Name:	Millharbour		
Site Area (ha):	5.05		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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 falls within the Tower Hamlets Activity Area and existing consent includes provision for retail.
	+ Site of less than 5ha within a town centre that includes main town centre uses.		
	0 Site outside of a town centre and other criteria do not apply.	0/?	
	- Site of less than 5ha outside of either a town centre or edge of centre ²⁹ that includes main town centre uses. ³⁰		
	-- 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.		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	
	- 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.		

²⁹ 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.

³⁰ 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):	5.05		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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 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.		
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	
	- 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.
	+ 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 Name:	Millharbour		
Site Area (ha):	5.05		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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	
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3 & 2
	+ 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.		
16. Contaminated Land: 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 3.36ha of 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.
	+ 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:	Millharbour South		
Site Area (ha):	4.09		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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.
	+ 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.		
3. Health and wellbeing: 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:	Millharbour South		
Site Area (ha):	4.09		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		Primarily 2 but proportion in 1b
	+ 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. Education: Increase and improve the provision of and access to childcare,	++ Site includes provision of a new school that will meet wider needs.	++	

Site Name:	Millharbour South		
Site Area (ha):	4.09		
Sustainability Objective	Basis for appraising sites	Score	Commentary
education and training facilities and opportunities for all age groups and sectors of the local population.	+ Site safeguards/expands an existing school on site.		Site being considered for a Primary School.
	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.		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).		
	? 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).		Site is not within a SIL, POL or LEL.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	0	
	- Development would result in the loss of employment in a LEL		

Site Name:	Millharbour South		
Site Area (ha):	4.09		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	-- 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 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.	+	
	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 ³¹ that includes main town centre uses. ³²		
	-- 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.		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	
	- 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.		
	++ 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.

³¹ 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.

³² 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	Score	Commentary
11. Open space: 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.		
	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	
	- 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.
	+ 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,	++ Not used (evaluation of any positive 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	Score	Commentary
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).		
	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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3
	+ 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.		
16. Contaminated Land: 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 3.27 ha of 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).		

Site Name:	North Quay		
Site Area (ha):	2.22		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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	
	- 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. Health and wellbeing: 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:	North Quay		
Site Area (ha):	2.22		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: 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 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.		No new schools proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	North Quay		
Site Area (ha):	2.22		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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. 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.		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).		
	? 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).	++	Employment led development is proposed and 2.22 ha of the site lies within Canary Wharf Preferred Office Location
	+ Site would provide employment in a LEL 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.		

Site Name:	North Quay		
Site Area (ha):	2.22		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	? 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 less than 5ha entirely within Canary Wharf Major Centre.
	+ Site of less than 5ha within a town centre that includes main town centre uses.	+	
	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 ³³ that includes main town centre uses. ³⁴		
	-- 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.		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	
	- 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.		
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 strategic scale open space provision.
	+ Site includes open space provision but only sufficient to meet the needs of the development.		

³³ 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.

³⁴ 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):	2.22		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	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	
	- 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
	+ 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).		

Site Name:	North Quay		
Site Area (ha):	2.22		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	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.		
15. Flood risk reduction and management: 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		
	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.		
16. Contaminated Land: 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 2.05ha of 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).		

Site Name:	Oban Street		
Site Area (ha):	2.35		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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.		
2. Liveability: 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	
	- 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. Health and wellbeing: 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:	Oban Street		
Site Area (ha):	2.35		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: 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 but part of the site is within PTAL 5,4, 3 & 1b
	+ 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. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.		No new schools proposed.
	+ Site safeguards/expands an existing school on site.		

Site Name:	Oban Street		
Site Area (ha):	2.35		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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. 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.		No employment uses proposed.
	+ 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 allocation would not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	Oban Street		
Site Area (ha):	2.35		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ³⁵ that includes main town centre uses. ³⁶		
	-- 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 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.		
	- 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.		
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 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.		

³⁵ 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.

³⁶ 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:	Oban Street		
Site Area (ha):	2.35		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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.
	+ 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	

Site Name:	Oban Street		
Site Area (ha):	2.35		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3.
	+ 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.		
16. Contaminated Land: 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 2.30ha of 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).		

Site Name:	Reuters LTD		
Site Area (ha):	2.71		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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 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	
	- 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. Health and wellbeing: 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:	Reuters LTD		
Site Area (ha):	2.71		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: 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 3 but part of the site is within 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.	++	New Primary or Secondary School proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	Reuters LTD		
Site Area (ha):	2.71		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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.		No employment uses proposed
	+ 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 allocation would not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	Reuters LTD		
Site Area (ha):	2.71		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ³⁷ that includes main town centre uses. ³⁸		
	-- 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.		
	- 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.		
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 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.		

³⁷ 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.

³⁸ 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	Score	Commentary
	- 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	
	- 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
	+ 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	

Site Name:	Reuters LTD		
Site Area (ha):	2.71		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3
	+ 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.		
16. Contaminated Land: 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 1.90ha of 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).		

Site Name:	Riverside South		
Site Area (ha):	2.17		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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 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	
	- 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. Health and wellbeing: 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:	Riverside South		
Site Area (ha):	2.17		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		Wholly within 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.		No new schools proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	Riverside South		
Site Area (ha):	2.17		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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. 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.		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).		
	? 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 proposed employment led site allocation aligns with the site's location within the Canary Wharf Preferred Office Location.
	+ Site would provide employment in a LEL 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.		

Site Name:	Riverside South		
Site Area (ha):	2.17		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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.	+	
	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 ³⁹ that includes main town centre uses. ⁴⁰		
	-- 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.		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	
	- 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.		
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 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.		

³⁹ 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.

⁴⁰ 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	Score	Commentary
	- 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	
	- 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 and within 55m of Millwall and West India Docks SINC.
	+ 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	

Site Name:	Riverside South		
Site Area (ha):	2.17		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3
	+ 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.		
16. Contaminated Land: 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 1.95ha of 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).		

Site Name:	The Docklands Delivery Office		
Site Area (ha):	0.54		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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.		
2. Liveability: 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	
	- 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. Health and wellbeing: 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:	The Docklands Delivery Office		
Site Area (ha):	0.54		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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).		0
	+ 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. Transport and mobility: 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 5 but part of the site is within PTAL 6a.
	+ 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. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.		No new schools proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	The Docklands Delivery Office		
Site Area (ha):	0.54		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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. 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.		No employment uses proposed.
	+ 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 allocation would not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	The Docklands Delivery Office		
Site Area (ha):	0.54		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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 (open space proposal which would not include main town centre uses).
	+ Site of less than 5ha within a town centre that includes main town centre uses.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ⁴¹ that includes main town centre uses. ⁴²		
	-- 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 is partially within the St Annes Church Conservation Area.
	+ 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.		
	? 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.		Includes local 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.		

⁴¹ 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.

⁴² 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:	The Docklands Delivery Office		
Site Area (ha):	0.54		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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 London's Canals SINC.
	+ 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	

Site Name:	The Docklands Delivery Office		
Site Area (ha):	0.54		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: 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.		
16. Contaminated Land: 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).		

Site Name:	The Highway, Pennington Street		
Site Area (ha):	1.52		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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.
	+ 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.		
3. Health and wellbeing: 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:	The Highway, Pennington Street		
Site Area (ha):	1.52		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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 assessed on the basis that it 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. Transport and mobility: 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 4 & 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.		
	+ Site safeguards/expands an existing school on site.		

Site Name:	The Highway, Pennington Street		
Site Area (ha):	1.52		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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. 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.		No employment uses proposed.
	+ 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 allocation would not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	The Highway, Pennington Street		
Site Area (ha):	1.52		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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 development proposal which would not include main town centre uses).
	+ Site of less than 5ha within a town centre that includes main town centre uses.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ⁴³ that includes main town centre uses. ⁴⁴		
	-- 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 is partially within an Archaeological Priority Area and partially within the St George in the East Conservation Area.
	+ 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.		
	? 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.		Includes local 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.		

⁴³ 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.

⁴⁴ 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:	The Highway, Pennington Street		
Site Area (ha):	1.52		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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).		Within 18m of St George's in the East Church Gardens SINC and within 18m of Swedenborg Gardens SINC
	+ 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	

Site Name:	The Highway, Pennington Street		
Site Area (ha):	1.52		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: 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.		
16. Contaminated Land: 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 1.48ha of brownfield development and is 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.
	+ 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:	Westferry Printworks		
Site Area (ha):	6.40		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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	
	- 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. Liveability: 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 expanded 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. Health and wellbeing: 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:	Westferry Printworks		
Site Area (ha):	6.40		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	0 No new health facilities proposed on site	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. Housing: 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. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	++ Site lies within PTAL 5 or 6a/b		Wholly within 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.		
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and	++ Site includes provision of a new school that will meet wider needs.	++	New Secondary School proposed
	+ Site safeguards/expands an existing school on site.		

Site Name:	Westferry Printworks		
Site Area (ha):	6.40		
Sustainability Objective	Basis for appraising sites	Score	Commentary
opportunities for all age groups and sectors of the local population.	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.		The site allocation would not provide employment or impact on existing employment areas.
	+ 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 not provide employment or impact on existing employment areas.
	+ Site would provide employment in a LEL Local Employment Location (LEL).		
	0 Site does not provide employment and does not impact on existing employment areas.	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.		

Site Name:	Westferry Printworks		
Site Area (ha):	6.40		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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.		
	0 Site outside of a town centre and other criteria do not apply.	0	
	- Site of less than 5ha outside of either a town centre or edge of centre ⁴⁵ that includes main town centre uses. ⁴⁶		
	-- 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.		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	
	- 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.		
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 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.		

⁴⁵ 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.

⁴⁶ 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:	Westferry Printworks		
Site Area (ha):	6.40		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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	
	- 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
	+ 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	

Site Name:	Westferry Printworks		
Site Area (ha):	6.40		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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.		
15. Flood risk reduction and management: To minimise and manage the risk of flooding	++ Site is wholly within flood zone 1		Within FZ3
	+ 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.		
16. Contaminated Land: 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 5.47ha of 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).		

Site Name:	Whitechapel South		
Site Area (ha):	12.72		
Sustainability Objective	Basis for appraising sites	Score	Commentary
1. Equality: 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.		
2. Liveability: 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	
	- 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):	12.72		
Sustainability Objective	Basis for appraising sites	Score	Commentary
3. Health and wellbeing: 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	
	- 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.	++ Site provides a net gain of over 500 dwellings (assessed on the basis of the minimum number of dwellings that would be provided).		0
	+ 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. Transport and mobility: 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 6a but part of the site is within PTAL 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:	Whitechapel South		
Site Area (ha):	12.72		
Sustainability Objective	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.	++ Site includes provision of a new school that will meet wider needs.		No new schools 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.	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. 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.		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).		
	? 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).		Employment led development. 5.23 ha of the site is within the Whitechapel Local Employment Location.
	+ Site would provide employment in a LEL Local Employment Location (LEL).	+	
	0 Site does not provide employment and does not impact on existing employment areas.		

Site Name:	Whitechapel South		
Site Area (ha):	12.72		
Sustainability Objective	Basis for appraising sites	Score	Commentary
	- 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 total site area exceeding 5ha. Only 4.24ha of 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.	+	
	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 ⁴⁷ that includes main town centre uses. ⁴⁸		
	-- 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 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.
	+ 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.	--/?	
	? Score uncertain if site is within 400m of a Conservation area or designated site.		

⁴⁷ 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.

⁴⁸ 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):	12.72		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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 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.		
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	
	- 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).		No natural heritage 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	
	- 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 Name:	Whitechapel South		
Site Area (ha):	12.72		
Sustainability Objective	Basis for appraising sites	Score	Commentary
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	
	- 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.		
15. Flood risk reduction and management: 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.		
16. Contaminated Land: 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 6.95ha of 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).		

Appendix L: 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.

High level considerations

<p>NPPF Requirements</p> <p>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.</p>	<p>LBTH Policies</p> <p>Strategic Policy H1 delivering housing. 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 partly reflects the role of the London Plan in setting targets for growth but also the stage in the Local Plan preparation process. .</p>
<p>Amec Foster Wheeler Observations (Recommendations are shown in bold)</p> <p>The Plan seeks to meet the requirements for new homes and employment set out in the London Plan to 2025 and to focus development in the Opportunity Areas. The Plan is being rolled forward to 2031 and the dwelling requirement is being reviewed because of concerns around deliverability. 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 Chapter on the Economy references the latest employment projections which show that the number of jobs in the Borough can grow from 285,000 to 410,000 by 2031.</p>	

Building a Strong, Competitive Economy

<p>NPPF Requirements</p> <p>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)</p>	<p>LBTH Policies</p> <p>Strategic Policy EMP1 'Investment and Job Creation' Strategic Policy EMP2 'Employment Locations' Policy EMP3 'Provision of New Employment Space' Policy EMP4 'Protecting Employment; and Policy EMP5 'Redevelopment within the Borough's Employment Areas</p>
<p>Amec Foster Wheeler Observations (Recommendations are shown in bold)</p> <p>Employment Land Review on-going at the time of this review. Policy EMP4 'Protecting Employment' retains reference to 24 months with no additional justification but we understand that other local authorities have also adopted 24 months, the justification could be expanded to make this point. 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 (Policy EMP3) and note that this has been added. 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 note that SG1 references these principles.</p>	

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 DC1 provides the hook.

Delivering a Wide Choice of High Quality Homes

<p>NPPF Requirements 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) Set out the authority's approach to housing density to reflect local circumstances.(47) 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) Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing Planning Policy for Traveller Sites, August 2015 a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets 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 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) 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 e) protect local amenity and environment.</p>	<p>LBTH Policies Strategic Policy H1 is concerned with delivering housing. Other policies are as follows: Policy H2 'Mixed and Balanced Communities' Policy H3 'Housing Standards and Quality' Policy H4 'Specialist Housing' Policy H5 'Gypsies and Travellers' Policy H6 'Student Housing'</p>
<p>Amec Foster Wheeler Observations (Recommendations are shown in bold) Housing trajectory and comments on maintaining a 5 year land supply not yet provided. The draft policies reflect local issues, e.g. size and tenure of housing required and deliverability of a range of affordable housing. Policy H5 safeguards the existing Gypsy and Traveller site at Old Willow Close and states that the Council will secure any new pitches that come forward as a result of the Cross Rail development at Willow Close. It is recommended that both sites are identified on the Proposals Map once it is prepared. The new site should be assessed to ensure that it is suitable for the proposed use, e.g. in relation to noise, highways etc.</p>	

Promoting sustainable transport

<p>NPPF Requirements Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) 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) 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) 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>LBTH Policies Strategic Policy TRN1 'Sustainable Travel' Policy TRN2 'Assessing the Impacts on the Transport Network' Policy TRN3 'Parking and Permit – free' Policy TRN5 (sic) 'Sustainable Transportation of Freight'</p>
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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)

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)

Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)

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)

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)

The setting of car parking standards including provision for town centres. (39-40)

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)

Supporting high quality communications infrastructure (paras 42-46)

Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)

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)

Amec Foster Wheeler Observations (Recommendations are shown in bold)

The range and content of the policies appears to be broadly reasonable, and accord with the intentions of the NPPF. Policy TRN.2 states that developments generating a higher number of trips to be located in town centres and/or areas with an appropriate level of public transport accessibility and where public transport can accommodate the proposed increase in the number 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.

Ensuring the vitality of town centres

NPPF Requirements

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)

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)

LBTH Policies

- Strategic Policy TC1 Town Centre Hierarchy
- Strategic Policy TC2 Protecting and Enhancing Our Town Centres.
- TC3 'Protecting and Enhancing Retail in Our Town Centres'
- TC4 'Managing and Supporting Retail Outside of Our Town Centres'
- TC5 'Financial and Professional Services'
- TC6 'Food, Drink, Entertainment and the Night-time economy
- TC7 'Short-stay Accommodation'
- TC8 'Offices within the Town Centre'
- TC9 'Markets'

Amec Foster Wheeler Observations

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. This recommendation is outstanding and details of the SPG have been provided.

A previous recommendation was that list of District Centres be included in policy – this has been addressed in Policy TC1.

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 not been addressed and the relevant policy is now DH11.

A previous recommendation was that the Plan could cross-reference the Council's Statement of Licensing Policy – this has not been addressed and the relevant policy is now TC6.

Consider whether the policy relating to the night-time economy (TC.4) could draw more from the GLA's SPG on Town Centres (pages 23 to 24).

Green Infrastructure

<p>NPPF Requirements</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. (109)</p> <p>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 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>LBTH Policies</p> <p>Strategic Policy OS1 'Creating a Network of Open Spaces'</p> <p>Strategic Policy OS2 'Enhancing Water Spaces'</p> <p>OS3 'Open Space and Green Grid'</p> <p>OS4 'Protecting the Blue Ribbon Network'.</p>
<p>Amec Foster Wheeler Observations (Recommendations are shown in bold)</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. It is noted that a reference to the All London Green Grid has been added to Strategic Policy OS1.</p>	

Conserving and enhancing the historic environment

<p>NPPF Requirements</p> <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>LBTH Policies</p> <p>DH1 'Local character, the historic environment and place sensitive design'</p> <p>Policy DH3: Heritage and the historic environment</p> <p>Policy DH4: World Heritage Sites</p>
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Amec Foster Wheeler Observations (Recommendations are shown in bold)

Previous recommendations as follows:

Consider whether or not Policy 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.

Paragraph 135 of the NPPF relates to non-designated assets and set out the principles for determining applications that affect them.

Consider splitting Policy DH3 into two parts, one dealing with proposals affecting designated assets and one dealing with non-designated assets.

Consider whether or not the same comments apply to Policy DH.4: World Heritage Sites, for example the language used in relation to assessing harm on their setting.

These recommendations have not been addressed.

It is recognised that there is a careful balance to be made in properly reflecting the principles set out in the NPPF without repeating the NPPF but at the same time policies need to be compliant with the NPPF and it could be argued that Policy D5 and D6 as currently worded are not. The Inspectors Report on the Hounslow Local Plan, 31st July 2015 highlighted this as an issue in relation to the draft Hounslow Local Plan (paragraph 153 refers).

Requiring good design

<p>NPPF Requirements Develop robust and comprehensive policies that set out the quality of development that will be expected for the area. (58)</p>	<p>LBTH Policies DH1 'Local character, the historic environment and place sensitive design' and DH2 'Creating Attractive and Safe Streets and Places'. Other policies are as follows: DH3 'Heritage and the Historic Environment' DH4 'World Heritage Sites' DH5 'Streets and the Public Realm' DH6 'Building Heights' DH7 'Density' DH8 'Amenity' DH9 'Noise Pollution' DH10 'Overheating' DH11 'Shopfronts' DH12 'Advertisements and Hoardings' and DH13 Telecommunications</p>
<p>Amec Foster Wheeler Observations (Recommendations are shown in bold) The range and content of the policies appears to be broadly reasonable, and accord with the intentions of the NPPF. Policy DH5 includes measures to improve safety and perceptions of safety in the public realm and it is suggested that SG1 could make reference to the adoption of measures to design out crime more generally.</p>	

Promoting healthy communities

<p>NPPF Requirements 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) Policies should plan positively for the provision and use of shared space, community facilities and other local services. (70)</p>	<p>LBTH Policies Strategic Policy DH1 Local Character, Historic Environment and Place-Sensitive Design Strategic Policy DH2 Creating attractive and safe streets and spaces Policy DH5: Streets and the public realm Strategic Policy H1 promotes mixed use development.</p>
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	Strategic Policy CSF1 Supporting Community, Cultural and Social Facilities Policy CSF3 Pre-school provision) Policy CSF4 Schools and lifelong learning Policy CSF5 Health & medical facilities Policy CSF6 Sports and leisure Policy CSF7 Community Centres and Places of Worship CSF8 'Cultural Facilities' CSF9 'Public Houses'
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Amec Foster Wheeler Observations (Recommendations are shown in bold)

A previous recommendation was that the plan could consider an explicit reference to the provision of facilities through shared spaces, e.g. in Policy CSF1. Encouraging shared facilities is referenced in Key Objective 1 under implementation but this might have greater weight if then carried through to a policy, e.g. CSF1.

Climate Change, Minerals, Resources and Energy

<p>NPPF Requirements</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 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>LBTH Policies</p> <p>Policies SG1 'Sustainable Growth in Tower Hamlets, DH10 'Overheating' ES3 'Urban Greening and Biodiversity' ES4 'Reducing Flood Risk and ES5 'Sustainable Waste Management' ES6a 'Achieving a Zero Carbon Borough' ES7 'Waste management'; and ES8 'Waste management Capacity.'</p>
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Amec Foster Wheeler Observations (Recommendations are shown in bold)

Policy ES3 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 has been partially addressed – the justification for Policy ES3 identifies types of areas that can experience the Heat Island effect – the recommendation was suggesting that specific locations in the Borough that may be more susceptible to it are identified (if there are any).

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London Borough of Tower Hamlets

Integrated Impact Assessment accompanying 'Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Consultation Draft'

Draft Report for Cabinet



October 2016

Amec Foster Wheeler Environment
& Infrastructure UK Limited



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Document revisions

No.	Details	Date
1	Initial Draft to client	17 th October 2016
	Revised Draft	20 th October 2016



Non - Technical Summary [to be completed when main report agreed]

Purpose of this report

Body text

The Draft Local Plan

Body text

Integrated Impact Assessment

Body text and diagram

Key Findings and Recommendations from the IIA

HIA

EqIA

HRA

The Assessment of the Vision and Objectives

The Assessment of Policies

The Assessment of Sites

Recommendations

Next Steps

Body text

How to Comment

Body text



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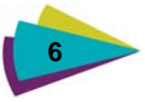
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1. Introduction

1.1 Background

- 1.1.1 The London Borough of Tower Hamlets has engaged Amec Foster Wheeler to undertake an Integrated Impact Assessment (IIA) of the emerging Local Plan for the Borough. The IIA will incorporate Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). This Draft Report presents the results of initial work and accompanies 'Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Consultation Draft' (the Draft Local Plan). Further iterations of the report will be produced as the Plan progresses and this document is a draft as minor changes to the draft Local Plan have been on-going. An addendum to the IIA will be provided prior to the Cabinet meeting with a final consolidated version then being provided for public consultation.

1.2 The Draft Local Plan

- 1.2.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 sets 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).
- 1.2.2 Once adopted the Draft Local Plan will replace the borough's current Local Plan (comprising the Core Strategy and Managing Development Document).
- 1.2.3 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 government and the Greater London Authority.
- 1.2.4 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.

Policy Context

- 1.2.5 Key documents that set the policy context for the IIA are briefly discussed below. The focus is on documents that define sustainable development and / or set the planning context within the UK and London.
- 1.2.6 Under section 39(2) of the Planning and Compulsory Purchase Act (PCPA) 2004 a local authority exercising their plan making functions must do so with the objective of contributing to the achievement of sustainable development.

National Planning Policy Framework (NPPF)

- 1.2.7 The National Planning Policy Framework (NPPF) (March, 2012) sets out government's planning policies for England and how these are expected to be applied. The NPPF must be taken into account in the preparation of Local and Neighbourhood Plans, and is a material consideration in planning decisions. It states that in order to be considered sound a Local Plan should be consistent with national planning policy.

- 1.2.8 The NPPF sets out (at paragraphs 150-157) that each local planning authority should prepare a local plan for its area. Local plans should set out the strategic priorities and policies to deliver:
- ▶ the homes and jobs needed in the area;
 - ▶ retail, leisure and other commercial development;
 - ▶ infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management and energy;
 - ▶ health, security, community and cultural infrastructure and other local facilities;
 - ▶ climate change mitigation and adaptation; and
 - ▶ conservation and enhancement of the natural and historic environment, including landscape.

The NPPF and Sustainable Development

- 1.2.9 The NPPF cross references Resolution 42/187 of the United Nations General Assembly, which defined sustainable development as:
- “Meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*
- 1.2.10 The NPPF also cross references the UK Sustainable Development Strategy: Securing the Future.
- 1.2.11 Paragraph 6 of the NPPF reiterates the requirements of section 39 (2) of the PCPA 2004:
- “The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.”*
- 1.2.12 Paragraph 7 of the NPPF states:
- There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:*
- ▶ **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - ▶ **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
 - ▶ **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 1.2.13 Paragraph 14 of the NPPF sets out a presumption in favour of sustainable development and states:
- At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.*
- For plan-making this means that:*
- ▶ local planning authorities should positively seek opportunities to meet the development needs of their area;
 - ▶ Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

For decision-taking this means:

- ▶ approving development proposals that accord with the development plan without delay; and
- ▶ where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

1.2.14 NPPF Paragraph 152 sets out the approach to achieving the three dimensions of sustainable development. It states that:

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.”

1.2.15 Paragraph 165 of the NPPF states that:

“A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.”

National Planning Practice Guidance

1.2.16 In March 2014 the Department for Communities and Local Government (DCLG) launched the Planning Practice Guidance (PPG) web-based resource. This was accompanied by a Written Ministerial Statement which includes a list of the previous planning practice guidance documents cancelled when this site was launched.

1.2.17 The PPG outlines the purpose and key issues for a Local Plan (Paragraph: 001 Reference ID: 12-001-20140306):

“Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design. They are also a critical tool in guiding decisions about individual development proposals, as Local Plans (together with any neighbourhood plans that have been made) are the starting-point for considering whether applications can be approved. It is important for all areas to put an up to date plan in place to positively guide development decisions.”

1.2.18 PPG also reiterates the role of sustainability appraisal in plan preparation, our emphasis (Paragraph: 018 Reference ID: 11-018-20140306):

*“The sustainability appraisal should **outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.** It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented.”*

London Plan

- 1.2.19 The Mayor's London Plan (last updated March 2015) is the Spatial Development Strategy for Greater London. It sets out a regional vision and policies that cover housing, transport, employment and the environment amongst others. The borough's Local Plan is bound to and will be tested against its general conformity and compliance with the London Plan.
- 1.2.20 The Further Alterations to the London Plan (FALP) was adopted in March 2015. The FALP has increased Tower Hamlets minimum ten year housing target from 28,850 to 39,314. Employment provision will also increase significantly, with 35,000 new jobs forecast between 2011 and 2036. The FALP identifies a number of Opportunity Areas in the Borough.
- 1.2.21 The FALP defines Opportunity Areas as areas that can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two. The Opportunity Areas within the Borough are: City Fringe/Tech City (including Whitechapel), Isle of Dogs and South Poplar, and Lower Lea Valley (including part of the Olympic Legacy area and the Poplar Riverside Housing Zone).
- 1.2.22 Opportunity Area Planning Frameworks (OAPFs) have been prepared for the City Fringe/Tech City (2015) and Lower Lea Valley (2007). The Planning Framework for the Isle of Dogs and South Poplar Opportunity Area is under preparation.
- 1.2.23 The Lower Lea Valley OAPF was published by the Mayor of London in January 2007 and set out his views on how the Lower Lea Valley as whole should change through the intensification of existing activities, the upgrading of facilities and buildings, and the managed release of industrial land to provide a broader range of land uses.
- 1.2.24 The guidance in Appendix 8 of the Olympic Legacy Supplementary Planning Guidance (OLSPG), published in July 2012, replaces the Lower Lea Valley OAPF where the two areas overlap.
- 1.2.25 The Mayor's planning priorities for the Queen Elizabeth Olympic Park and the surrounding areas are set out in Policy 2.4 of the London Plan and the OLSPG. This is now being taken forward through a Local Plan prepared by the London Legacy Development Corporation (LLDC), discussed below.
- 1.2.26 The London Plan and associated Supplementary Planning Guidance (SPG) also includes a range of policies relating to new development, which the Local Plan should not seek to duplicate.

.London Legacy Development Corporation

- 1.2.27 The LLDC came into being on April 1, 2012. From October 1, 2012 the LLDC became the Local Planning Authority for the Olympic Park and surrounding neighbourhoods, which includes Bromley-by-Bow and Fish Island. The LLDC functions and responsibilities include those related to plan making and decision making.
- 1.2.28 It will be important for both local planning authorities to ensure that their plans complement each other, e.g. by ensuring that there is connectivity across the plan areas and that proposals are complementary in accordance with the Duty to Cooperate.

Overview of the Draft Local Plan

- 1.2.29 The Draft Local Plan sets out a vision which establishes the priorities for the Local Plan and informs the objectives, strategic policies, development management policies and spatial strategy which will help guide development and planning decisions up to the year 2031.
- 1.2.30 The proposed vision within the Draft Local Plan is:

"As the centre of London expands east, Tower Hamlets will embrace its role as the focus for London's growth, making best use of the economic benefits from Canary Wharf, the City and Stratford. The connections between the borough and surrounding areas will be improved whilst maintaining our own distinct East-End identity. This growth will be primarily delivered in the Isle of Dogs and South Poplar, the Lower Lea Valley and the City Fringe and along transport corridors.

The benefits of the transformation of our borough will be shared throughout Tower Hamlets and by all our residents, ensuring no one is left behind.

Tower Hamlets will continue to be home to a wide range of diverse communities. We will support our existing communities and welcome new residents to make their home within liveable, mixed, stable and cohesive neighbourhoods, which provide for a high quality of life. These will contain a wide range of housing types, prioritising family and affordable housing and be served by a range of excellent, shared and accessible services, community and recreation facilities and infrastructure. They will be green, safe and accessible to all, promoting walking and cycling and making best use of our network of parks and waterways, including Victoria and Mile End Park and the Thames and Lea rivers.

Places and neighbourhoods will be transformed with high quality buildings and well-designed spaces, while protecting what make each place unique: ensuring a sensitive balance between, and integration of, old and new. High standards of environmental sustainability will result in improvements in air quality, carbon emissions, recycling and mitigation to climate change. Innovative, smart technology will enhance the provision of services. This will ensure the on-going social and environmental sustainability of greater levels and higher densities of development.

Alongside high quality residential neighbourhoods, Tower Hamlets will play a significant role in London's global economy, ensuring it remains an evolving, creative and dynamic borough. The strategic role of Canary Wharf and the City Fringe will be supported, alongside nurturing and developing our thriving SME sectors, properly recognising the need to support the entrepreneurial and business-focussed dynamism of many of our local residents, preserving our remaining industrial heritage and promoting our historic and distinctive Town Centres, markets and heritage and cultural attractions. This economic growth will be sustained by the enhancement of our public transport network."

- 1.2.31 The vision acknowledges the Borough's role as the focus for London's growth and places emphasis on the Borough's role as a home to a diverse range of communities, existing communities will be supported and new residents welcomed.
- 1.2.32 In order to deliver the vision, the Draft Local Plan proposes two key objectives to frame policies:
- ▶ Key Objective 1: Managing growth and shaping change
 - ▶ Key Objective 2: Spreading the Benefits of Growth
- 1.2.33 The first objective seeks to ensure that growth contributes to identified social and economic need. Each objective is elaborated through principles and implementation
- 1.2.34 The Draft Local Plan establishes planning policies for the following topics:
- ▶ Sustainable Growth in Tower Hamlets;
 - ▶ Design and Historic Environment;
 - ▶ Housing;
 - ▶ Economy and Jobs;
 - ▶ Town centres;
 - ▶ Community, Culture and Social Facilities;
 - ▶ Open Spaces and Water Spaces;
 - ▶ Environmental Sustainability;
 - ▶ Transport and Connectivity; and
 - ▶ Developer Contributions.
- 1.2.35 Each topic, with the exception of the last, includes Strategic Policies that set out key principles and more detailed policies that relate to specific matters within the topic.

- 1.2.36 The London Plan identifies the City Fringe/Tech City (including Whitechapel), Isle of Dogs and South Poplar, and Lower Lea Valley as Opportunity Areas and the Draft Local Plan proposes to reflect these in the Local Plan, in order to ensure the proper planning of infrastructure provision across the area. In consequence, it establishes planning policies under the heading of placemaking for:
- ▶ City Fringe;
 - ▶ Central Area;
 - ▶ Lower Lea Valley;
 - ▶ Isle of Dogs and South Poplar.
- 1.2.37 At the same time the Draft Local Plan identifies the potential for the Central part of the Borough to be treated in the same strategic manner as the Opportunity Areas. The Draft Local Plan also acknowledges that the Borough is a collection of 24 hamlets or places that sit within the Opportunity Area and the need for new development to reflect that.
- 1.2.38 Although the Draft Local Plan, once adopted will run to 2031 the current version does not set out the scale of housing and employment to be provided to that date. It will need to do so in order for it to be found sound. The Draft Local Plan discusses the implications of the current target for housing provision in the Borough, which is capacity led, and sets out the Council's commitment to working with the GLA and other local authorities in updating the Strategic Housing Land Availability Assessment and to arrive at a revised housing target that reflects the capacity of sites and their ability to deliver over time.
- 1.2.39 The stage at which the Local Plan is at is important as it influences what the IIA can do and what can be assessed at this point in time.

1.3 Scope of the Integrated Impact Assessment (IIA)

- 1.3.1 This IIA incorporates Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). Each of these is discussed in turn below.

Sustainability Appraisal (SA)

- 1.3.2 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects.

Strategic Environmental Assessment (SEA)

- 1.3.3 In undertaking the requirement for SA, local planning authorities must also incorporate the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the SEA Directive, and its transposing regulations the Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633). This is reflected in paragraph 165 of the NPPF and the relevant sections of the PPG.
- 1.3.4 There is a requirement to consult on the scope of the SEA with statutory consultees (Heritage England, Natural England and the Environment Agency) and this exercise was undertaken by the Council. Consultation on the scope of the assessment was undertaken by the Council between 14th December 2015 and 8th February 2016. The results of the scoping exercise and the way in which this has influenced this later work is attached as **Appendix A**.

Health Impact Assessment (HIA)

- 1.3.5 There is no statutory requirement for HIA. Undertaking HIA helps ensure that health and wellbeing are being properly considered in planning policies and proposals. The process looks at the positive and negative health and wellbeing impacts of development as well as assessing the indirect implications for the wider community. Within the context of the Local Plan, the aim is to identify the main health and wellbeing impacts in order to identify any opportunities for the emerging planning policies to maximise the benefits and avoid any potential adverse impacts. The HIA is presented at **Appendix G** and the approach to HIA is discussed in Section 2.6 of this report.

Equalities Impact Assessment (EqIA)

- 1.3.6 An EqIA is not a statutory requirement but is a tool to assist the Council to comply with requirements under the UK Equality Act 2010 and Public Sector Equality Duty, which requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. EqIA serves as a mechanism for ensuring that 'due regard' is given to minority groups in decision-making and the activities of the Council. This includes policies, procedures, projects and proposals. Legislation identifies nine protected characteristics and the EqIA considers the potential for effects on these.
- 1.3.7 The protected areas are:
- ▶ Gender;
 - ▶ Race;
 - ▶ Disability;
 - ▶ Sexual orientation;
 - ▶ Religion/belief;
 - ▶ Marriage and Civil Partnership
 - ▶ Age;
 - ▶ Gender reassignment; and
 - ▶ Pregnancy / maternity.
- 1.3.8 The EqIA is presented at **Appendix H** and the approach to EqIA is discussed in Section 2.7 of this report.

1.4 Habitats Regulations Assessment

- 1.4.1 Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the 'Habitats Regulations') requires that competent authorities (including the Borough Council) assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any 'likely significant effects' (LSE) on any European site. The process by which the impacts of a plan or programme are assessed on European sites is known as 'Habitats Regulations Assessment' (HRA). The Council will need to consult on the assessment with Natural England. Whilst the HRA is a stand-alone assessment and report, its findings will be included within the SA/SEA Report, particularly with regard to the appraisal of effects on biodiversity. The HRA is presented as a stand-alone report and the approach to HIA is discussed in Section 2.8 of this report.

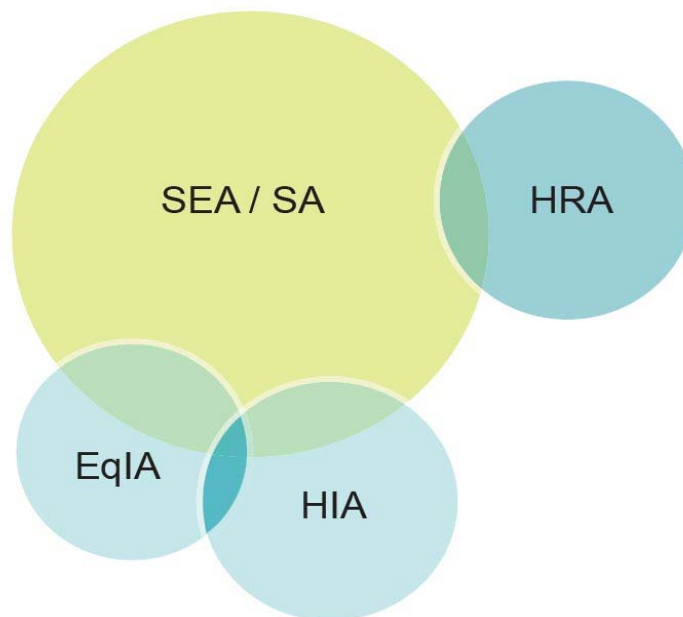
Integrating the Different forms of Assessment

- 1.4.2 There are overlaps between the different forms of assessment as follows, see **Figure 1.1**:

- ▶ **HRA** – HRA requires an assessment of likely significant effects on European sites. European sites are a component of the many features that will be considered under the biodiversity topic, identified in the SEA Directive. The datasets collected will be useful to both assessment processes. The range of mitigation measures identified in the HRA in order to avoid, minimise or lessen any effects on a European site may also need assessment under the SEA Directive. Whether a plan or programme has an effects on European sites identified under the Habitats Directive is also a key consideration in determining whether the SEA Directive applies to a plan or programme.
- ▶ **EqIA** – The SEA Directive requires consideration of issues relating to population and the datasets collected to provide a baseline for the topic will be useful to both assessment processes.
- ▶ **HIA** – The SEA Directive requires consideration of issues relating to human health and the datasets collected to provide a baseline for the topic will be useful to both assessment processes. Potential effects on European sites will include recreational disturbance which may have an effect related to health.
- ▶ There are also potential overlaps between HIA and EqIA because of the nature of the topics covered.

1.4.3 IIA provides the opportunity for each form of assessment to inform the other, whilst ensuring that each strand of the assessment meets relevant expectations and requirements in relation to reporting.

Figure 1.1: Overlaps between the different forms of assessment



1.5 Purpose of this Report

- 1.5.1 This report accompanies the draft Local Plan.
- 1.5.2 The purpose of this report is to respond to the comments made on the Scoping Report, and to present the resulting revised approach to and results of the IIA of the Draft Local Plan, including consideration of reasonable alternatives, where relevant.
- 1.5.3 This report complies with relevant requirements set out in the Regulations and a checklist is provided at **Appendix B** to demonstrate this.

1.6 How to Comment on this IIA Report

- 1.6.1 This IIA Report has been issued for consultation alongside the Draft Local Plan from **Friday 11th November to Monday 2nd January 2017**. Details of how to respond to the consultation are provided below.

This Consultation: How to Give Us Your Views

We would welcome your views on any aspect of this IIA Report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.

Please provide your comments by midnight on Monday 2nd January 2017. Comments should be sent to:

By email: TBC

By post:

FREEPOST

Local Plan Consultation

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2. Approach to the IIA

2.1 Overview

- 2.1.1 This section begins by providing an overview of key sustainability issues, linkages to plans and programmes and the evolution of the baseline without the Local Plan. It then sets out the approach to each element of the IIA.

2.2 Key Sustainability Issues

- 2.2.1 The key sustainability issues relevant to the Local Plan were identified in the Scoping Report and no additions to these were suggested in responses received to the scoping consultation.
- 2.2.2 The key sustainability issues reflect the challenges and priorities set out in the Community Plan, 2015. The underlying evidence base which informs these issues is contained in **Appendix C and D**.
- ▶ **A growing and changing population:** Tower Hamlets was the second fastest growing borough in England and Wales for the year 2013/14 (based on proportion). High growth is predicted to continue. The increasing population will also create changes in the age and 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 biggest growing age group is of residents aged 35 to 64.
 - ▶ **Increasing income inequality and enduring deprivation:** Tower Hamlets is one of the most relatively deprived areas in London and England for multiple deprivations. Since 2007, the borough has improved in its overall relative position in the country. However the proportion of children and older persons living in income deprived families is significantly high. In addition income inequality is high and increasing.
 - ▶ **Relatively high unemployment and skills gap:** Tower Hamlets is a major location for employment in London, attracting a large daytime population of employees. However there is a major skills gap between local residents and the jobs available, reflected in a rising but lower than London average employment level. The median income in the borough is also lower than the UK and London average, reflecting low average skill levels. Fewer adult residents hold higher qualifications or any qualifications than the London average.
 - ▶ **Varying economic strengths of local town centres:** Current vacancy rates in the borough's town centres vary from around 1.25% to 15.5%. In addition levels of fast-food outlets, betting shops and payday loan stores are higher than ideal and have socio-economic and health implications. Town Centre uses are changing, with increasing cultural and social activities and a move away from traditional retail provision.
 - ▶ **Undersupply of housing:** The Council is in the process of producing a new Strategic Housing Market Assessment. Early indications suggest the Council will need to produce a large number of additional homes, of which over half will need to be affordable and about half will need to be family homes, reflecting a current lack of both tenures. In 2015, there was a waiting list of 19,810 households on the Council's housing waiting list.
 - ▶ **Overcrowding and lack of suitable homes:** Overcrowding is a major issue in the borough. According to the 2011 census, 32,235 households had too few rooms than they required. This represented 34.8 per cent of all households in the borough.
 - ▶ **Housing affordability gap:** Housing has been getting less affordable in the borough. This is reflected in both high sale and private rental values. Between 2010 and 2015 house prices rose by 46% from £341,900 to £499,060. The percentage of social housing stock is also reducing

and affordable housing products are diversifying and becoming more expensive. The changes to welfare provision is limiting the ability of the low paid and unemployed to live in the borough.

- ▶ **Pressure on school places:** The expected housing and population growth in the borough increase the need for school places. Current forecast is that there will be about 9,000 more 4-16 year olds needing a school place over the next 10 years. Over the extra capacity already planned for, that means the equivalent of 2-3 new primary schools. The growth in primary numbers in previous years is now feeding through to secondary schools and the borough will require 2-3 new secondary schools over the next 10 years. However fluctuating birth rates across London, as well as increasing family mobility, means that this figure will need regular revision.
- ▶ **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 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.
- ▶ **High health inequalities:** 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. Tower Hamlets has higher than average premature death rates from cancer, respiratory disease and circulatory disease.
- ▶ **Poor children's health indicators:** Children in Tower Hamlets have amongst the highest levels of obesity nationally as well as poor oral health. Vitamin D deficiency is also a concern amongst mothers and children. Lower than average percentages of children achieving a good level of development at the end of reception year at school is also a concern.
- ▶ **Relatively high levels of crime and concern about crime:** Whilst total crime figures and most crime types are reducing in the borough, the rate of crime is still higher than that for London and England. In addition residents reported crime as the top concern in Tower Hamlets and public confidence with the police is only at 60%.
- ▶ **Pressure on transport capacity:** There is a need to increase the current and future capacity on trains, underground, overground, DLR, buses and local roads. 'Pinch points' around the borough need to be addressed, particularly those identified in the Isle of Dogs. 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.
- ▶ **Lack of open space:** Tower Hamlets has just over 232 hectares of open space which is 1.2 hectares per 1,000 residents. This is well below the National Playing Fields Standard of 2.4 hectares per 1,000. With increasing development creating new open space is a challenge.
- ▶ **Poor air quality:** Tower Hamlets produces the third highest level of total carbon dioxide emissions of the 33 Local Authorities in Greater London. Air pollution levels for the borough overall exceed targets set by the Government's Air Quality Strategy, 2007. Transport contributes to the majority of pollution in the borough. The close proximity of much of the borough to large arterial roads is of much concern, due to the impact on 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 considered to be the second largest contributor to deaths after smoking.
- ▶ **Increasing rates of Fuel Poverty:** In 2013, 7.6% households in Tower Hamlets were estimated to be experiencing fuel poverty. This was an increase from the previous year, in which 7.3% of all households in the borough were estimated to be experiencing fuel poverty.
- ▶ **Rising Heat Island Effect:** London 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. The 2003 summer heatwave resulted in about 600 excess deaths in London. ¹The 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.

- ▶ **Low levels of biodiversity:** There are large areas in the borough which are considered to have deficient access to nature and biodiversity.
- ▶ **Low recycling rates:** The Council's recycling rates are below the London average, but rising steadily. The organic recycling rate is particularly low, which reflects the relatively small amount of garden waste produced, due to the nature of the housing stock. Whilst individual local authorities no longer have borough specific recycling targets, all local authorities are working towards 50% recycling rates (the National target).
- ▶ **Pressures on waste processing capacity:** 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.
- ▶ **Poor water quality:** 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.
- ▶ **High level of flood risk,** especially in areas of expected development: A considerable proportion of the borough is within flood zones 2 and 3 (areas of highest risk). This includes those areas expected to accommodate high levels of development, including around the river Lea and Isle of Dogs. Over a third of Tower Hamlet's surface area is covered by buildings, roads and car. This high level of surface sealing exacerbates the risk of surface water level flooding. There are four critical drainage areas identified in Tower Hamlets Lower Lee Valley, Millenium Quarter and Crossharbour, Wood Wharf and Fish Island. Development offers the opportunity to reduce flood risk in these areas..
- ▶ **High 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%.
- ▶ **Heritage under pressure from development:** 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. The demand for development could result in less consideration to the impact of appropriate scale of new buildings on the wider area. The Tower of London is a UNESCO world heritage site, a status which could be threatened unless its surroundings are protected.
- ▶ **Emerging design issues:** Increasing development is raising issues around sunlight, daylight and wind effects. In addition the borough may wish to undertake local view assessments to understand whether there are local views which should be protected, in addition to those protected by the London Plan. Finally the opportunity areas in the borough are located in areas of high archaeological importance.

2.2.3

The ability to influence these issues through the Local Plan and the management of development varies considerably between issues and this will be factored into this IIA. The IIA will not make recommendations that are not be appropriate taking into account the scope and purpose of the Local Plan. So for example the Plan can provide policies to help ensure that uses that would contribute to noise are appropriately located but there is little it can do about activities that already contribute to noise.

¹ <https://www.london.gov.uk/WHAT-WE-DO/environment/climate-change-weather-and-water/climate-change-and-weather/heat>

2.3 Evolution of the Baseline

- 2.3.1 The SEA Directive requires the assessment to consider relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme. The Scoping Report provided information on the current state of the baseline and trends that is included in **Appendix D** of this report.
- 2.3.2 There are two external factors that will influence planning policy in the Borough without the Local Plan. The NPPF and the London Plan. The NPPF is important, particularly Paragraph 14 which instructs that where a plan is absent, silent or out of date planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in the NPPF indicate development should be restricted.
- 2.3.3 The London Plan is important because it sets out the anticipated quantum of housing and employment development in the Borough to 2036 (housing supply monitoring targets are identified to 2025) and three Opportunity Areas City Fringe, Lower Lea Valley and Isle of Dogs & South Poplar, where significant growth is anticipated (see paragraphs 1.2.15 to 1.2.21 above).
- 2.3.4 The NPPF and the London Plan combined are likely to have a strong influence on how the Borough will develop if a Local Plan were not in place for any reason. The absence of a Local Plan would not mean that development in the Borough would come to a halt. Proposals would be considered against the London Plan (including targets for housing and employment growth) and the provisions of the NPPF, including the presumption in favour of sustainable development.

2.4 Links to other Plans and Programmes

- 2.4.1 The Scoping Report considered relevant plans and programmes at the national, regional and local levels. The review is provided in **Appendix E** of this report.
- 2.4.2 From the review a number of common objectives were identified. These informed the development of the objectives that have been used as part of the assessment. The common objectives are as follows:
1. Place the public and community at the centre of planning processes and policy objectives.
 2. Plan for and meet the challenges of population growth.
 3. Foster trans-boundary cooperation and co-delivery of strategies and services to address issues where appropriate.
 4. Improve the quality of life for all residents and reduce deprivation, including child poverty and fuel poverty.
 5. Facilitate the development of a wide choice of housing tenures, sizes and affordability level that meet lifetime and energy efficiency standards and caters for all, including the need for specialist housing.
 6. Protect human health and reduce health inequalities, through provision of adequate health facilities and by influencing the wider determinates of health.
 7. Improve the safety and security of all, and promote community cohesion.
 8. Improve access to community facilities, including leisure facilities.
 9. Increase accessible open spaces that are high quality, connected, multi-functional and include spaces for play.
 10. Promote accessible, safe and sustainable transport and reduce transport related contributions to climate change.

11. Ensure all school age residents have access to high quality and well-designed education facilities and improve access to early years provision, including childcare.
12. Increase opportunities for residents to get into training, access lifelong learning opportunities and acquire skills for employment to benefit from job opportunities.
13. Support a robust, low carbon and competitive economy that creates shared prosperity and helps all residents reach their full potential.
14. Support the vitality of diverse, inclusive and secure town centres and neighbourhoods.
15. Protect, conserve and enhance the historic environment, heritage assets and cultural heritage.
16. Promote inclusive and sustainable design and construction which contributes to a sense of place.
17. Minimise the borough's contribution to climate change and promote mitigation and adaptation measures to address the negative effects of climate change.
18. Promote energy security and increase the proportion of energy use from renewable sources.
19. Maintain biodiversity; conserve and enhance natural habitats, and landscapes of importance.
20. Encourage reduced and more efficient use of water.
21. Protect and manage the quality of water bodies, including groundwater.
22. Improve air quality.
23. Reduce and manage the risk of floods.
24. Reduce waste, enhance recycling and reuse, and promote sustainable waste management.
25. Avoid, prevent and reduce adverse effects to residents and nature of exposure to environmental noise.
26. Safeguard and enhance the quality of soil.
27. Promote development on previously developed land.

2.5 Sustainability Appraisal of the Draft Local Plan Vision and Key Objectives

- 2.5.1 The Draft Local Plan contains a vision and two key objectives. These are supported by a set of implementation considerations. There is no prescribed format for assessing these elements of a Plan and the approach taken in this instance is to review the vision in terms of its scope and content and to analyse the two key objectives and implementing considerations against the IIA objectives, with a view to identifying any gaps in the key objectives and implementation considerations.

2.6 Sustainability Appraisal of the Proposed Policies and Strategic Allocations

- 2.6.1 The Sustainability Appraisal matrix is attached as **Appendix F** to this document. It includes a set of objectives and guide questions that have been used to frame the appraisal of policies against each objective. The Draft Local Plan also contains a number of strategic sites. A set of criteria have also been prepared to assist with the assessment of these, these help ensure consistency and transparency in the appraisal of sites. **Table 2.1** sets out the scoring system used to record potential effects.

- 2.6.2 Policies have been assessed by Section (e.g. Housing, Economy and jobs, Town Centres etc.) with a separate matrix produced for each section. The matrix identifies potential effects and whether or not they are considered significant, for each objective there is also an opportunity to record any suggested mitigation (or changes to policy) and any assumptions and uncertainties.
- 2.6.3 The appraisal scores for sites are pre-mitigation, recognising that there is **potential** for a significant effect. Whether or not an effect will happen will, in some cases be dependent on how a site is designed and the mix of uses agreed. So for example if the Council's requirements for a particular site include an Idea Store the site has been assessed on that basis. Where a site is appraised as having a potential significant negative effect in relation to SA objective 10 'Design and Heritage' because of proximity to a Conservation Area the actual effect will depend on factors like scale, massing, layout, materials.

Table 2.1 Scoring System

Score	Description	Symbol
Significant Positive Effect	The proposed option/policy contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option/policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.	~
Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	?

2.7 Cumulative, Synergistic and Secondary Effects

- 2.7.1 The SEA Directive and SEA Regulations require that the secondary, cumulative and synergistic effects of the Local Plan are assessed. In particular, it will be important to consider the combined sustainability effects of the policies and proposals of the Local Plan both alone and in-combination with other plans and programmes.
- 2.7.2 At this early stage in the development of the Local Plan, it has not been possible to consider the cumulative effects of the Local Plan as a whole or in combination with other plans and programmes. This is because key decisions relating to quantum and location of future development have yet to be made. A detailed appraisal of cumulative effects will therefore be undertaken at the next stage of the Local Plan preparation process. Consideration has been given to the potential for cumulative effects that Local Plan policies and strategic sites could have.

2.8 Approach to the HIA

- 2.8.1 The London Healthy Urban Development Unit (HUDU) has developed a Rapid Health Impact Assessment Tool (June 2015). It 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.

LHUDU advise that 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.

2.8.2 The assessment matrix identifies eleven topics or broad determinants:

- ▶ Housing quality and design;
- ▶ Access to health care and other social infrastructure;
- ▶ Access to open space and nature;
- ▶ Air quality, noise and neighbourhood amenity;
- ▶ Accessibility and active travel;
- ▶ Crime reduction and community safety;
- ▶ Access to healthy food;
- ▶ Access to work and training;
- ▶ Social cohesion and lifetime neighbourhoods;
- ▶ Minimising the use of resources; and
- ▶ Climate change;

2.8.3 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.

2.8.4 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.

2.8.5 The results of the exercise are discussed in Section 3 of this report and the completed tool is enclosed as **Appendix G**.

2.9 Approach to the EqIA

2.9.1 Under the Equality Act 2010 and Public Sector Equality Duty, the requirement to conduct an equality analysis is designed to provide a mechanism for ensuring that “due regard” is given to minority groups in the decision-making and activities of the Council. Specifically, a public authority must, in the exercise of its functions, have due regard to the need to:-

- ▶ Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- ▶ Advance equality of opportunity between people who share a protected characteristic and those who do not
- ▶ Foster good relations between people who share a protected characteristic and those who do not

2.9.2 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:-

- ▶ Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;

- ▶ Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- ▶ Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

- 2.9.3 The Council has developed a two stage approach to the analysis of equality issues. The first stage (which can be repeated as a proposal develops) involves completion of a Quality Assurance Checklist. The checklist is a tool to assess that due regard is embedded and evidenced in a proposal. Further analysis may be undertaken as a natural progression from the Quality Assurance when there are concerns about the impacts of the 'proposal' and, or, evidencing of due regard. This more in-depth analysis is backed by formal consultation, further research, evidence, data collection and analysis.
- 2.9.4 At this stage the EqIA has focussed on completion of the Quality Assurance Checklist. The completed checklist is included in **Appendix H** of this report. Section 3 of this report discusses the results of the exercise and whether or not more detailed work is considered necessary.

2.10 Approach to the HRA

- 2.10.1 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 site² or a European offshore marine site³ (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)⁴. 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. The Borough Council has a statutory duty to prepare the Local Plan and is therefore the competent authority for the HRA.
- 2.10.2 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 the 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 Draft 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.
- 2.10.3 The HRA of the Draft 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

² 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.

³ '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.

⁴ 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.

sensitive) to the outcomes of a plan due to the absence of any reasonable impact pathways). For the LBTH 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.

- 2.10.4 The current European Commission (EC) guidance⁵ 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	
Stage 1 – Screening	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.
Stage 2 – Appropriate Assessment	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.
Stage 3 – Assessment of Alternative Solutions	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.
Stage 4 – Assessment Where No Alternative Solutions Exist and Where Adverse Impacts Remain	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.

- 2.10.5 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. . 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).
- 2.10.6 The approach taken is to identify the current factors affecting them and their conservation objectives then to screen the policies in the Draft Local Plan to see if they would contribute to any existing problems. The HRA is attached as Appendix I of this report and the results are discussed in Section 3.7 of this report.

2.11 Working on the IIA

- 2.11.1 The IIA is an on-going process and will continue as the Local Plan develops. This section sets out the approach to the work and what has been done to date.

Who undertook the IIA and when

- 2.11.2 Along with the 'Our Borough, Our Plan: A new Local Plan first steps' document, the London LBTH prepared and consulted on a draft Scoping Report for the Sustainability Appraisal (SA) of the Local Plan prepared by officers of the Council. The SA will be incorporated in the IIA. The consultation on the Scoping Report ran from 14 December 2015 to 8 February 2016.

⁵ *Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EC 2002).*

- 2.11.3 The IIA for the Draft Local Plan has been undertaken by Amec FW, working in conjunction with LBTH officers. Work on the assessment stage commenced in February 2016 following completion of the Scoping Report and analysis of consultation responses by LBTH with support from Amec Foster Wheeler. Responses to the Scoping Report are attached at **Appendix A**. In response to the comments the wording of the objective relating to design and heritage was amended to better reflect national policy and additional documents were added to the review of plans and programmes.
- 2.11.4 Other milestones to date are:
- ▶ An inception meeting in February 2016 to agree the methodology for the IIA, initial timetable, approach to integrating the IIA and plan making;
 - ▶ A workshop with officers in March 2016 on the IIA methodology and key challenges, including consideration of options and assessment of allocations;
 - ▶ An initial review of emerging policies in May 2016 and a short note (for Council use only) setting out the results of this work, including recommendations; and
 - ▶ An initial review of the approach to the spatial strategy and strategic allocations in July 2016 and a short note (for Council use only) setting out the implications for the Local Plan and IIA; and
 - ▶ Further notes (for Council use only) on draft policies in September and October 2016.

Technical difficulties and assumptions

- 2.11.5 The main difficulty (or area of uncertainty) relates to the Strategic Sites and the mix of uses they might accommodate, particularly employment. At the moment this is not specified so it has been difficult to assess sites against relevant objectives. One of the recommendations is that the Local Plan provides more detail about the mix of uses on strategic sites as this will assist the IIA but also help demonstrate that the plan meets the requirements of the NPPF.

3. Appraisal of Effects

3.1 Introduction

- 3.1.1 This section sets out the key messages from the various assessments and should be read in conjunction with the information set out in the accompanying appendices.

3.2 Sustainability Appraisal

- 3.2.1 The text below sets out the results of the appraisal, it begins by providing an assessment of high level options, then comments on the vision and key objectives in the Draft Local Plan and their relationship to the IIA objectives. General policies are then assessed. Consideration is then given to the results of the assessment of the strategic sites in the Draft Local Plan. Consideration is then given to cumulative, synergistic and secondary effects.

Consideration of Reasonable Alternatives

- 3.2.2 The Local Plan must be in conformity with the London Plan. This limits the potential to consider reasonable alternatives (also known as options) associated with the scale and location of housing and employment provided in the Borough, as the London Plan contains policies on both these aspects.
- 3.2.3 As the London Plan includes an annual housing target and an indication of the scale of job growth to 2031, the SA has not considered options associated with housing and employment provision. It may be that consideration needs to be given to these matters as the Local Plan progresses as further work on the London Plan leads to further refinement on the scale of growth that can be delivered in the Borough over a given timescale. However, at this stage, the reasonable alternatives considered to key aspects of the plan, have been significantly restricted.
- 3.2.4 This approach is corroborated by the Inspectors Report on the Local Plan for the London Borough of Hounslow 31st July 2015), which states:
- “London has a two-tier planning system in which the London Plan and the Local Plan are both part of the Development Plan. The London Plan sets out the broad strategy for the city as well as some more detailed provisions. It includes key policy requirements and the Local Plan is required to be in general conformity with it. This limits the scope for the consideration of alternative strategies on matters such as: the supply of housing (for which the London Plan sets a target for the Borough); the location of employment (for which the London Plan identifies some locations and employment types to be provided or protected); and the hierarchy of town centres...”*
- 3.2.5 Para 39 then states:
- “For these reasons the preparation of the Local Plan and the requisite sustainability appraisal explicitly only explored policy options where the opportunity for proposing reasonable alternatives to national and regional policy existed, whether to meet local objectives or to respond to local distinctiveness.”*
- 3.2.6 The targets for growth set out in the London Plan for Tower Hamlets are capacity led, i.e. they are based on an assessment of the anticipated capacity of sites in the Borough identified in the Strategic Housing Land Availability Assessment for London. This means that there is no scope for considering spatial options associated with the development of different sites at this time (as all the possible sites have been identified and included at this stage).

Spatial Strategy

- 3.2.7 The intention is that the new Tower Hamlets Local Plan will move away from the Core Strategy's '24 places' approach to one based on four broader areas in the Borough and within which the 24

places would sit. These areas recognise the three existing regional spatial designations from the London Plan: the City Fringe, Lower Lea Valley and Isle of Dogs. A new designation for the Central Area is also proposed, although this would not have the same status as the Opportunity Areas identified in the London Plan.

- 3.2.8 The proposed approach in the spatial strategy aligns the Local Plan with the approach in the London Plan regarding opportunity areas for the City Fringe, Lower Lea Valley and the Isle of Dogs. Furthermore, the approach will help ensure that the new Tower Hamlet's Local Plan will be in conformity with the London Plan. The three regional spatial designations provide an opportunity to take a more strategic approach to development and the provision of necessary infrastructure and it is anticipated that proposals will be detailed in the Opportunity Area Planning Frameworks (OAPFs) for each area. The new Central Area designation also provides the opportunity to shape emerging strategy in the London Plan, i.e. by advancing the case for a new Opportunity Area, or at least ensuring that its needs (in terms of infrastructure etc.) are acknowledged in the London Plan.
- 3.2.9 The change in emphasis from 24 places to 4 strategic areas might possibly lead to concerns around the loss of local identity and character that the Core Strategy emphasised through the hamlets based approach but the draft Local Plan acknowledges that the 24 places sit within the 4 areas (and it is clear that the intention is not to lose the locally distinctive places. Whilst the OAPFs provide an opportunity to consider local character in more detail (2 are already complete) they are non-statutory documents.
- 3.2.10 One way to offset concerns in relation to impact on local character would be for the spatial strategy to recognise the role that Neighbourhood Planning could play in shaping development. We note that the following have been designated as neighbourhood areas (Wapping, East Shoreditch, Limehouse, Isle of Dogs and Spitalfields (Business Area) in the Borough so far and that the Local Plan acknowledges these. It is noted that under key objective 2 of the Draft Local Plan there is now a commitment to support the process of Neighbourhood Planning and this is supported.
- 3.2.11 Equally there are general policies proposed in the Local Plan that seek to protect and enhance neighbourhood centres and facilities so the Local Plan provides the framework for planning that can inform the OAPFs and planning at the neighbourhood level in areas where Neighbourhood Plans are absent.
- 3.2.12 **Table 3.1** below sets out the appraisal of alternative approaches to spatial planning for the Borough. It considers an option based on the 24 places (which would still need to acknowledge and plan for development in the Opportunity Areas) and one based on the 4 strategic areas. It highlights those objectives where the 4 Strategic Places approach could have advantages in terms of helping to plan for and deliver infrastructure, e.g. SA objective 5 'Transport' and the growth anticipated in the London Plan, SA objective 8 'Economic Growth.' SA objectives where it is arguable that the 24 Places approach might perform better include SA objective 10 'Design and Heritage.'
- 3.2.13 The 'choice' between the 24 places approach and the 4 strategic areas is not anticipated by the IIA team to have any implications for the scale and distribution of development across the Borough, which will reflect the provisions in the London Plan. The significant economic, social and environmental effects associated with both choices are therefore considered to be similar. The relationship between the 24 places and 4 strategic areas can be likened to Russian dolls, with the places sitting within the 4 strategic areas. The key will be to ensure that the 4 strategic areas approach is implemented sensitively, with development respecting the place within which development is to be accommodated. The objectives and general policies in the Local Plan provide the opportunity to ensure that this is done, as do the OAPFs and NDPs.
- 3.2.14 The Council's preferred approach is to adopt the Strategic Places approach because it will help plan for growth and ensure that key infrastructure is delivered. General policies in the Local Plan will be important in setting out the requirements for development in areas that are more sensitive to development under the Strategic Areas approach.

Policy and Strategic Site Options

- 3.2.15 In terms of the approach to the assessment of alternative policies, the options are limited because policies need to be in compliance with the NPPF and other national policy and also the London Plan. Additional work is to be undertaken in relation to the consideration of options as the SA progresses. Later iterations of the IIA will need to consider any proposed changes to policies, e.g. in light of responses to the Draft Local Plan.
- 3.2.16 In terms of the approach to the assessment of strategic sites, the sites provided by the Council at this stage have been assessed, the Council has confirmed that no sites that constitute reasonable alternatives have been discounted. The Draft Local Plan is at an early stage and the level of development to be accommodated to 2031 and the contribution of sites to delivering this requirement is not finalised. Consideration has therefore been given to the strategic sites provided by the Council which are not already under construction, this includes assessment of some sites with planning permission.

Table 3.1: SA of Alternative Options for Spatial Planning

SA Objective	Commentary	Option	
		Bottom up - 24 Places Approach Acknowledging the Opportunity Areas in the London Plan	Top down - 4 Strategic Areas Approach Acknowledging the 24 Areas
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	Both alternatives could contribute, 24 Places Approach could be more sensitive to local needs but the 4 Strategic Areas approach could provide a better basis for securing and co-ordinating investment through the Infrastructure Delivery Plan.	++/?	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	24 Places Approach could be more sensitive to local needs but 4 Strategic Areas approach might encourage/enable a more 'joined up' approach to planning for neighbourhoods, e.g. in relation to public transport and infrastructure.	++	++
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	24 Places Approach could be more sensitive to local needs but 4 Strategic Areas approach might encourage/enable a more 'joined up' approach to planning for neighbourhoods, e.g. in relation to green grid and health related infrastructure.	++	++
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	Considered to be neutral for both options.	++	++
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	4 Strategic Areas approach could be better in terms of analysing capacity issues and securing strategic transport infrastructure.	++/?	++
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.	24 Places Approach could be more sensitive to local needs but 4 Strategic Areas approach might encourage/enable a more 'joined up' approach to planning for neighbourhoods, e.g. in relation to secondary education provision.	++/?	++
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	Considered to be neutral for both options.	++	++
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	24 Places Approach would need to acknowledge the areas of economic growth within the Borough that are identified in the London Plan. Opportunity Area approach clearly aligns to these.	++/?	++
9. Town Centres: Promote diverse and economically thriving town centres.	Considered to be neutral for both options.	++	++
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	24 Places Approach could be more sensitive to local needs.	++	++/?
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	24 Places Approach could be more sensitive to local needs but 4 Strategic Areas approach could encourage/enable investment in the green grid on a more strategic, cross Borough basis.	++/?	++

SA Objective	Commentary	Option	
		Bottom up - 24 Places Approach Acknowledging the Opportunity Areas in the London Plan	Top down - 4 Strategic Areas Approach Acknowledging the 24 Areas
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	Arguable that the Council's carbon off-setting scheme could operate under either of these scenarios but 4 Strategic Areas approach provides the basis for planning for strategic flood infrastructure.	++/?	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	24 Places Approach could be more sensitive to local needs but 4 Strategic Areas approach could encourage/enable investment in the green grid on a more strategic, cross Borough basis.	++/?	++
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	24 Places Approach could be more sensitive to local needs but 4 Strategic Areas approach could encourage/enable planning for Borough wide schemes.	++/?	++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	4 Strategic Areas approach provides the basis for planning for strategic flood infrastructure.	++/?	++
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	Considered to be neutral for both options.	++	++

Vision and Objectives

- 3.2.17 The vision is set out at page 38 of the Draft Local Plan (and contained in this IIA report at paragraph 1.2.30).
- 3.2.18 The vision recognises the role of Tower Hamlets in the wider London context, making the positive case for sustainable growth and realising the associated economic and community benefits while at the same time ensuring the current Borough's distinctive identity and character are maintained. The vision identifies preferable locations for housing and economic development, outlines expected standards and sustainability outcomes and provides the infrastructure to enable it to happen.
- 3.2.19 The vision is supported by two key objectives, with each objective supported by a number of principles and the means through which they will be implemented. **Table 3.2** presents a high level gap analysis of the Draft Local Plan objectives and principles against the IIA objectives, and specifically identifies those IIA objectives that will be supported. Its completion should also help identify any areas of re-enforcement and any potential conflicts between objectives.

Table 3.2 Local Plan Objectives and IIA Objectives

Objective and Principles	Implemented through	Supports the following IIA Objectives
<p>Objective: Managing growth and shaping change</p> <p>Principles: Growth must contribute positively to existing, identified, social, economic and environmental needs</p> <p>Growth must be supported by social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported.</p> <p>Growth must be balanced, containing employment, retail and community facilities, alongside increasing residential development</p> <p>Growth must be well designed and enhance local distinctiveness, ensuring old and new are properly integrated</p> <p>Growth must respect, protect and enhance our environment Growth must make the best use of the best available technological innovations</p>	<p>1. Delivering Tower Hamlets’ regional role as a key location for London’s housing and employment growth, while calling for adequate recognition of this role through regional and national investment prioritisation.</p>	<p>4 Housing, 5 Transport and Mobility, 7 Employment, 8 Economic growth, 9 Town Centres</p>
	<p>2. Positively meeting our duties to deliver of our strategic housing based on a proper evidenced assessment of infrastructure capacity and need for infrastructure investment.</p>	<p>2 Liveability, 4 Housing, 5 Transport and Mobility</p>
	<p>3. While recognising that transport and community infrastructure is in various parts of the Borough reaching, at, or exceeding capacity, securing the timely provision of sufficient infrastructure to meet current and future requirements, with the cumulative impact of future development being considered.</p>	<p>2 Liveability 5 Transport and Mobility</p>
	<p>4. Supporting additional transport infrastructure schemes, such as an Eastern Branch to Crossrail 2, enhanced river crossing capacity and strategic intervention and investment to support growth the Isle of Dogs</p>	<p>4 Housing, 5 Transport and Mobility, 7 Employment, 8 Economic growth, 9 Town Centres</p>
	<p>5. Protecting a range of land uses, including a wide range of employment spaces, retail use and community facilities to support a truly mixed-use borough.</p>	<p>2 Liveability, 4 Housing, 5 Transport and Mobility, 7 Employment, 8 Economic growth, 9 Town Centres</p>
	<p>6. Making the best use of our available land, through encouraging the co-location of uses, shared facilities, integrated infrastructure, the delivery of pocket parks and ensuring connectivity between places.</p>	<p>2 Liveability, 5 Transport and Mobility, 11 Open space</p>
	<p>7. Strengthening the role of our Town Centres to ensure all residents live within walking distance of a Town Centre which contains a diverse mix of uses, including a range of local services and shops.</p>	<p>2 Liveability, 5 Transport and Mobility, 9 Town Centres, 14 Natural resources</p>
	<p>8. Protecting the uses, spaces and places, including water spaces, which make the borough unique and delivering successful place making, which preserves heritage assets, enhances local distinctiveness, character and townscapes</p>	<p>2 Liveability, 7 Employment, 8 Economic growth, 9 Town Centres, 10 Design and heritage, 13 Biodiversity,</p>
	<p>9. Encouraging the use of innovative building types and technologies in suitable locations and where they provide sustainable high quality internal and external living environments.</p>	<p>2 Liveability, 12 Climate change, 13 Biodiversity, 14 Natural resources</p>
	<p>10. Requiring developments to reach the highest standards of environmental sustainability and deliver a robust built environment which is designed to adapt to, and reduce the effects of, climate change</p>	<p>2 Liveability, 12 Climate change, 14 Natural resources</p>

Objective and Principles	Implemented through	Supports the following IIA Objectives
	11. Recognising that while Tower Hamlets has some areas of tall buildings it is not by-and-large a high rise borough	2 Liveability, 4 Housing, 7 Employment, 10 Design and heritage
	12. Achieving a zero carbon borough in the 21st century, with a 60% reduction in carbon emissions by 2025	12 Climate change, 14 Natural resources
	13. Recognising that poor air quality is an urgent priority and must be addressed through a range of solutions, including a continuing modal shift away from polluting vehicles including through traffic.	3 Health and wellbeing, 13 Biodiversity
<p>Objective: Spreading the benefits of growth</p> <p>Principles: Growth must help reduce social, economic and environmental inequalities, by enriching the lives of existing residents</p> <p>Growth must promote community cohesion, ensuring the accessibility of spaces, places and facilities</p> <p>Growth must enable community leadership and engagement</p> <p>Growth must bring health benefits and reduce health inequalities</p>	14. Reducing existing spatial inequalities and barriers and preventing the future polarisation of areas or communities, through maximising regeneration opportunities, in particular in South Poplar, the Lower Lea Valley and the Isle of Dogs.	1 Equality, 2 Liveability, 4 Housing, 5 Transport and Mobility, 7 Employment, 9 Town Centres 10 Design and heritage, 16 Contaminated land
	15. Ensuring housing contributes to the creation of socially balanced and inclusive communities by offering housing choice reflecting the Council's priorities for genuinely affordable and family homes.	1 Equality, 2 Liveability, 4 Housing
	16. Helping to close the current skills gap, through improving access to education and training and increasing the mix of employment sectors.	1 Equality, 6 Education, 7 Employment, 8 Economic growth
	17. Maximising the economic benefits from the borough's world class visitor attractions and encouraging visitors to explore more of the borough.	7. Employment, 8 Economic growth, 9 Town Centres 10 Design and heritage
	18. Creating buildings, streets, spaces and places which promote social interaction and inclusion, which are accessible to all and which people value, enjoy and feel safe and comfortable in.	1 Equality, 2 Liveability, 5 Transport and Mobility
	19. Delivering healthy neighbourhoods that promotes active and healthy lifestyles and recreation and enhances people's wider health and well-being.	1 Equality, 2 Liveability, 3 Health and wellbeing, 5 Transport and Mobility
	20. Enabling all residents to be involved within the planning system, through consultation and by providing support for the process of Neighbourhood Planning.	1 Equality

3.2.20 **Table 3.2** suggests that collectively, all the IIA objectives are supported by the Local Plan objectives and principles and no gaps are identified.

3.2.21 A recommendation arising from this review is that the Local Plan could also signpost the policies that are considered to support each of the principles and associated implementation points.

3.3 Sustainability Appraisal of the Draft Local Plan Policies

3.3.1 The policies have been assessed by Section and the results are presented in **Appendix J** and are summarised by Section below.

Sustainable Growth in Tower Hamlets

3.3.2 This section of the Draft Local Plan contains two strategic policies. Policy SG1 sets out a holistic approach to deliver sustainable development and growth, it is intended to underpin the vision and the two key strategic objectives discussed in Section 1.2 of this report. Given the scale of development envisaged in the Borough, Policy SG2 'Planning and Construction of New Development' seeks to ensure that issues associated with construction are managed and where appropriate mitigated. Policy SG2 was included in the Local Plan following an early recommendation from the IIA team.

3.3.3 The scope of Policy SG1 is limited by changes in Government legislation. The Government has created 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, so while the policy requires the use of standards, e.g. BREEAM for commercial development, it cannot do the same for housing related development. Policy H1 of the Local Plan references the use of the Housing Quality Mark for housing schemes on a voluntary basis.

3.3.4 Significant positive effects are anticipated for both policies in relation to SA objective 2 'Liveability for different reasons. Policy SG1 sets out requirements for infrastructure provision and high quality design, which would directly contribute to this SA objective through ensuring appropriate infrastructure is provided alongside development proposals and through the promotion of a high quality public realm. Policy SG2 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 construction related noise, vibration and pollution impacts.

3.3.5 Significant positive effects are also anticipated for both policies in relation to SA objective 16 'Contaminated Land' as both policies will ensure that potential impacts on human health associated with remediation of land and the construction phase are assessed at the project level.

3.3.6 In relation to SA objective 4 'Housing', Policy SG1 requires development proposals to be of a high quality design and also seeks to maximise the provision of accessible housing. 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. Policy SG1 also highlights the need for development to consider a range of other factors, so significant positive effects are identified in relation to SA objective 10 'Design and Heritage' and SA objective 11 'Flood Risk.'

3.3.7 It is suggested that the Policy references the need for development to help prevent anti-social behaviour, reduce fear of crime and improve public safety through design.

Design and Historic Environment

3.3.8 This section of the Draft Local Plan contains a set of policies relating to design and the historic environment. There are two strategic policies, DH1 'Local character, the historic environment and

place sensitive design' and DH2 'Creating Attractive and Safe Streets and Places'. Other policies are as follows:

- ▶ DH3 'Heritage and the Historic Environment';
- ▶ DH4 'World Heritage Sites';
- ▶ DH5 'Streets and the Public Realm';
- ▶ DH6 'Building Heights';
- ▶ DH7 'Density';
- ▶ DH8 'Amenity';
- ▶ DH9 'Noise Pollution';
- ▶ DH10 'Overheating';
- ▶ DH11 'Shopfronts';
- ▶ DH12 'Advertisements and Hoardings'; and
- ▶ DH13 Telecommunications.

- 3.3.9 Policies will have a significant positive effect in relation to SA objective 2 'Liveability' for example Strategic Policy DH1 and Strategic Policy 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.
- 3.3.10 Policies will have a significant positive effect in relation SA objective 3 'Health' by promoting a range and mix of high-quality, publicly accessible green spaces. Policy DH9 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. Policy DH9 requires new development to avoid contributing to overheating which will have a significant positive effect on this objective.
- 3.3.11 Strategic Policy DH2 and policy DH5 will have a significant positive effect in relation SA objective 5 'Transport.' Strategic Policy DH2 requires development proposals to follow a street hierarchy which prioritises pedestrians and supports both the movements and place functions of streets. This would ensure that streets and wider transport networks function efficiently, as well as encouraging active travel modes, reduce car travel and promote sustainable modal shifts. Consequently the policy would have a major positive effect on this SA objective. Policy DH5 sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks and include high quality public realm. This would improve connectivity and permeability.
- 3.3.12 Strategic Policy DH1 and Strategic Policy DH2 will have a significant positive effect in relation to SA objective 8 'Economic Growth' as will Policy DH5. This is on the basis that enhancements to the public realm encouraged by the policies would help create the climate for retaining and attracting employment related activity. Similarly policies will have a positive effect in relation to SA Objective 9 'Town Centres' as providing an attractive built environment will help maintain their vitality.
- 3.3.13 All of the policies are assessed as having a significant positive effect in relation to SA objective 10 'Design and Heritage.' Policies DH3 and DH4 set out criteria to protect a range of recognised heritage asset. The other policies require development proposals to achieve high architectural, urban design and placemaking standards, positively contribute to townscape character and the public realm and adequately protect the amenity of adjacent sites and the public. 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.

- 3.3.14 In relation to SA Objective 11 'Open Space' a significant positive effect is anticipated. Strategic Policy DH1 requires development proposals to demonstrate good placemaking principles, including through providing a range and mix of high-quality, publicly accessible green spaces. This would increase high quality open space provision, resulting in a major positive effect on this SA objective.
- 3.3.15 Strategic Policy DH2 requires development proposals to follow a street hierarchy which prioritises pedestrians and supports both the movements and place functions of streets. This would indirectly encourage development proposals to maximise links between open spaces and the built environment, as well as enhancing connectivity between open spaces. As such the policy could indirectly link and enhance open spaces, resulting in a minor positive effect on this SA objective. Policy DH5 sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks and include high quality public realm. This would directly contribute to this SA objective through increasing access to, enhancing the quality of and encouraging greater connectivity between open spaces. Policy DH8 encourages the creation of attractive and useable open spaces. Through the promotion of open space provision to meet identified needs the policy would directly contribute to and have a major positive effect on this SA objective.
- 3.3.16 A significant positive effect is anticipated in relation to SA objective 12 'Climate Change' and Policy DH10 which requires that developments are designed to avoid overheating.
- 3.3.17 Policies also make significant positive contributions in relation to biodiversity, flood risk, natural resources and contaminated land.
- 3.3.18 While positive contributions are anticipated a suggestion has been made in relation to Policies DH3 'Heritage and the Historic Environment and DH4 'World Heritage Sites.' This recommendation stems from a concern that the structure and content of the policies does not reflect 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.

Housing

- 3.3.19 This section of the Draft Local Plan contains a set of policies relating to housing. Strategic Policy H1 is concerned with delivering housing. Other policies are as follows:
- ▶ Policy H2 'Affordable Housing';
 - ▶ Policy H3 'Housing Standards and Quality';
 - ▶ Policy H4 'Specialist Housing';
 - ▶ Policy H5 'Gypsies and Travellers'; and
 - ▶ Policy H6 'Student Housing'.
- 3.3.20 These policies include the housing target to 2025, a strategic affordable housing target of 50%, delivery mechanisms to meet these targets, quality standards for residential development proposals and criteria for specialist housing provision. The policies would result in the provision of suitable housing of all types to meet identified needs, in particular by resisting development that would involve a net loss of residential floorspace, ensuring sufficient delivery of affordable housing, prioritising the regeneration of existing housing estates, directing new housing to accessible locations and providing specialist housing where required (which could indirectly increase the availability of and or reduce land value pressures on general purpose housing for local residents).
- 3.3.21 In assessing these policies the IIA team took account of the fact that the Draft Local Plan does not yet set out the scale and location of housing provision to 2031. The assessment is undertaken on the basis of the trajectory of travel of housing policies, as drafted, and will consider in more detail, the effects of policies where subsequently they contain quantification.

- 3.3.22 All of the policies are judged to make a significant positive contribution to SA objective 1 'Equality' and SA objective 3 'Health' as all of these policies would help to reduce poverty, social exclusion and fuel poverty.
- 3.3.23 Significant positive effects are also anticipated in relation to SA objective 2 'Liveability.' Policies H1, H4, H5 and H6 direct residential developments, including for specialist housing, to areas with high accessibility, the potential to accommodate high densities (including areas with existing high densities), suitable infrastructure provision and open space. Policy H3 requires residential developments to protect existing and provide new amenity and play spaces. Through providing well designed residential developments in accessible locations these policies would improve access to local services, facilities and amenities, promote the development of a high quality public realm and ensure appropriate infrastructure provision.
- 3.3.24 All of the policies are assessed as having a significant positive effect in relation to SA objective 4 'Housing.' The policies would result in the provision of suitable housing of all types to meet identified needs, in particular by ensuring increased delivery of affordable housing and an appropriate range and mix of housing, prioritising the regeneration of existing housing estates, providing specialist housing and requiring good housing design standards to be met.
- 3.3.25 The provision of housing will help support economic growth across the Borough. Sustained levels of increased housebuilding would also directly increase construction related economic activity and employment in line with SA objective 8 'Economic Growth.'
- 3.3.26 Policies will also make a significant contribution to the achievement of SA objective 9 in relation to town centres. Policy H1 requires the distribution and density levels of proposed housing to be aligned with the hierarchy and proximity of the nearby town centres, and also requires residential development proposals to optimise the use of land. Policy H6 directly contributes to this SA objective as it directs student accommodation to Town Centres, which would increase footfall and support their vitality.
- 3.3.27 In terms of SA objective 11 'Open Space', Policy H3 sets minimum open space standards for residential developments and safeguards existing amenity space, therefore directly contributing to this SA objective.
- 3.3.28 No suggestions for changes to policies in this section have been identified.

Economy and Jobs

- 3.3.29 This section of the Draft Local Plan contains a set of policies relating the need for development to secure employment provision, the location of new employment development and protection of existing sites. Strategic Policy EMP1 'Investment and Job Creation' sets out the role of development in creating a sustainable, diverse and balanced economy. Strategic Policy EMP2 'Employment Locations' identifies employment locations and the preferred uses.
- 3.3.30 The other policies in the section are:
- ▶ Policy EMP3 'Providing New Employment';
 - ▶ Policy EMP4 'Protecting Employment; and
 - ▶ Policy EMP5 'Redevelopment within the Borough's Employment Areas'.
- 3.3.31 At present the Draft Local Plan does not make explicit the number of jobs to be provided over the period to 2031 by new development, although the London Plan sets out targets for the Opportunity Areas. The Policies are however judged to make a significant positive contribution to this objective because they provide the policy context for encouraging employment development. There is some uncertainty at this stage; however, later iterations of the Plan will be more specific in terms of the amount of employment to be provided and the contribution that development proposals will make. Despite this uncertainty, a significant positive effect is still anticipated in relation to SA objective 1 'Equality' given the anticipated scale of employment created (informed by the context provided by the London Plan).

- 3.3.32 Significant positive effects are also anticipated in relation to SA objective 5 'Transport' as policies seek to concentrate new employment and light industrial uses within highly accessible designated areas, which would support sustainable modal shifts and increase the efficiency of freight transport.
- 3.3.33 All policies make a significant positive contribution to SA objective 7 'Employment' and SA objective 8 'Economic Growth.' The 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 to 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, however they do not explicitly address issues regarding worklessness or barriers to employment within the local population, although the need to do this is identified in Policy SG1.
- 3.3.34 Policy EMP2 has a significant positive effect in relation to SA objective 7 'climate change' by to concentrating new employment and light industrial uses within highly accessible designated areas, which would support sustainable modal shifts, contribute to climate change mitigation.
- 3.3.35 No suggestions for changes to policies in this section have been identified.

Town Centres

- 3.3.36 This section of the Draft Local Plan contains a set of policies relating to the hierarchy of town centres in the Borough and uses within town centres.
- 3.3.37 Strategic Policy TC1 sets out the Town Centre hierarchy. Strategic Policy TC2 highlights the need for development to contribute to the function and viability of town centres.
- 3.3.38 Other policies are:
- ▶ TC3 'Protecting and Enhancing Retail in Our Town Centres';
 - ▶ TC4 'Managing and Supporting Retail Outside of Our Town Centres';
 - ▶ TC5 'Financial and Professional Services';
 - ▶ TC6 'Food, Drink, Entertainment and the Night-time economy';
 - ▶ TC7 'Short-stay Accommodation';
 - ▶ TC8 'Offices within the Town Centre'; and
 - ▶ TC9 'Markets'.
- 3.3.39 Significant positive effects are identified for SA objective 1 'Equality'. Strategic policy TC1 provides supports new community, cultural and social uses within the town centre hierarchy, specifically within District and Neighbourhood Centres. This would concentrate such uses in accessible locations, which would indirectly help to reduce social exclusion and therefore contribute to this SA objective. Policies TC2, TC3 and TC9 will also contribute to this objective by ensuring access to town centre related activities and healthy food, in the case of TC9. A significant positive effect is anticipated for TC2 and TC3 and a minor positive effect for TC9.
- 3.3.40 For SA objective 3 'Health' - Policies TC5 and TC6 sets 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 with negative health externalities, resulting in a major positive effect on this SA objective. Policy DC9 makes a minor positive contribution by providing an opportunity to access healthy food.
- 3.3.41 All policies seek to concentrate main town centre uses within highly accessible Town Centres and other centres, as identified in the hierarchy at TC1. This would link new high footfall development with sustainable transport provision and therefore support sustainable modal shifts, resulting in a direct major positive effect on SA objective 5 'Transport.'

- 3.3.42 A significant positive contribution to SA objective 6 'Education' is anticipated as Strategic policy TC1 provides supports new community, cultural and social uses within the town centre hierarchy, specifically within District and Neighbourhood Centres. This would allow education facilities to be developed in highly accessible locations, resulting in improved opportunities to access education and learning. The policies also make a significant positive contribution to economic growth SA Objective 8 and 9 on Town Centres.
- 3.3.43 No suggestions for changes to policies in this section have been identified.

Community, Culture and Social Facilities

- 3.3.44 This section of the Draft Local Plan contains a set of policies that aim to deliver and protect essential community infrastructure. Strategic Policy CSF1 'Supporting Community, Cultural and Social Facilities' sets out the role of development in relation to such infrastructure and cross references other policies that relate to the location of such facilities. Strategic Policy CSF2 relates to the protection of existing facilities and their re-provision if necessary.
- 3.3.45 The other policies are:
- ▶ CSF3 'Pre-school Provision';
 - ▶ CSF4 'Schools and Lifelong Learning';
 - ▶ CSF5 'Health and Medical Facilities';
 - ▶ CSF6 'Sports and Leisure';
 - ▶ CSF7 'Community Centres and Places of Worship';
 - ▶ CSF8 'Cultural Facilities'; and
 - ▶ CSF9 'Public Houses'.
- 3.3.46 Some policies are assessed as making a significant positive contribution to SA objective 1 'Equality'. Strategic Policy CSF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new, community facilities. This would directly contribute to this SA objective through increasing opportunities to reduce social exclusion and promote integration through community based activities.
- 3.3.47 Policies CSF3, CSF4 and CSF6 support the delivery of an expanded network of education, sport and leisure facilities whilst policy CSF7 provides support for appropriately located community facilities which enhance social integration. These policies would facilitate a range of learning and recreational opportunities which could both reduce social exclusion and increase integration, resulting in major positive effects on this SA objective.
- 3.3.48 All policies are assessed as having a significant positive effect in relation to SA objective 2 'Liveability.' policies set out criteria to protect existing services and facilities and to support new ones in accessible and appropriate locations. Strategic Policy CSF2 outlines where it can be robustly demonstrated that there is no longer a need for the specific facility, the site should be used for another community use, unless no longer needed when it should be used for affordable housing. Policy CSF8 also requires proposals for new cultural and social facilities to protect residential amenity, which contributes to this SA objective through avoiding adverse noise impacts on sensitive receptors.
- 3.3.49 In relation to health and well-being Strategic Policy CSF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new, health and community facilities, which would make a significant positive contribution to this SA objective. Strategic Policy CSF2 sets out criteria to safeguard existing community facilities (including health), which will also directly contribute to this objective. Policy CSF5 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.

Policy CSF6 provides support for the creation of new pitches and resists the loss of existing pitches, whilst Strategic Policy CSF2 also seeks to protect existing facilities. Both policies would therefore protect and enhance access to recreational facilities, resulting in increased access to sport and exercise activities with positive health outcomes.

- 3.3.50 There is potential for these policies to work in synergy with the housing policies to contribute towards the liveability aspects of SA objective 4 on housing, resulting in a significant positive effect. Strategic Policy CSF2 in particular highlights that where there is no longer a need for a specific community facility, the site could be used for affordable housing.
- 3.3.51 In relation to SA objective 6 'Education' Strategic Policy CSF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new, social infrastructure, 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. Policies CSF3 and CSF4 provides support for the delivery of an expanded network of pre-school, school, further and higher education facilities and upgraded Idea Stores, whilst policy CSF7 provides support for appropriate new community facilities. 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.
- 3.3.52 There is also significant positive effects in relation to SA objective 7 'Employment'. Policy CSF4 would directly contribute to this SA objective by increasing opportunities to access education and therefore improve skill levels increasing employment opportunities and likely to contribute to a reduction in worklessness.
- 3.3.53 Objective 11 'Open Space' Strategic Policy CSF2 sets out criteria to protect existing community facilities whilst policy CSF6 provides protection for existing pitches from development pressures and supports the development of new pitches. This would safeguard and enhance access to open space for recreational and wider social purposes.
- 3.3.54 A suggestion is that Policy CSF1 makes reference to the potential for community facilities to be provided through shared facilities where this is appropriate.

Open Spaces and Water Spaces

- 3.3.55 This section of the Draft Local Plan contains a set of policies relating to the creation of new open space and the protection of existing open spaces. Policies in relation to water seek to enhance water spaces and the blue ribbon network.
- 3.3.56 Strategic Policy OS1 'Creating a Network of Open Spaces' sets out the measures to protect, create, enhance and connect open spaces.
- 3.3.57 Strategic Policy OS2 'Enhancing Water Spaces' sets out the measures for securing a network of high quality, usable and accessible water spaces.
- 3.3.58 The other policies are:
- ▶ OS3 'Open Space and Green Grid'; and
 - ▶ OS4 'Protecting the Blue Ribbon Network'.
- 3.3.59 All policies are anticipated to have a significant positive effect on SA objectives 1 'Equality,' 2 'Liveability' and 3 'Health' They will provide the opportunities for recreational activity and safeguard the amenity and existing use of open spaces and water spaces.
- 3.3.60 A network of accessible and connected local spaces will also make a significant positive contribution to SA objective 5 on 'Transport and mobility.' Strategic Policies OS1 and OS2 and Policies OS3 and OS4 will contribute to this.
- 3.3.61 Protecting and enhancing existing open spaces could also help conserve and enhance townscape, making a significant positive contribution to SA Objective 10 'Design and Heritage.'

- 3.3.62 All policies make a significant positive contribution to SA objective 11 'Open Space.' Policy OS4 makes a significant positive contribution to climate change adaptation by requiring development to be set back from fluvial waters helping to mitigate flood risk.
- 3.3.63 All policies make a significant positive contribution to SA objective 13 'Biodiversity' and 14 'Natural Resources' by seeking the protection and enhancement of open spaces, water spaces and green corridors. For example policies OS3 and OS4 specifically require development proposals not to adversely impact on the biodiversity value of open and water spaces.
- 3.3.64 In relation to SA objective 14 'Contaminated land' the protection, development and enhancement of open spaces requires by Strategic Policy OS1 and Policy OS3 would help to improve soil quality, whilst the support provided in Policy OS3 for temporary greening would improve the appearance and longer term development potential of vacant and brownfield sites.
- 3.3.65 No suggestions for changes to policies in this section have been identified.

Environmental Sustainability

- 3.3.66 This section of the Draft Local Plan contains a set of policies relating to natural resources and the natural environment and specific environmental topics.
- 3.3.67 Strategic Policy ES1 'Protect and Enhance our Environment' sets out principles for reducing the use of natural resources and enhancement of the natural environment. The other policies are:
- ▶ ES2 'Improving Air Quality';
 - ▶ ES3 'Urban Greening and Biodiversity';
 - ▶ ES4 'Reducing Flood Risk';
 - ▶ ES5 'Sustainable Waste management';
 - ▶ ES6a 'Achieving a Zero Carbon Borough';
 - ▶ ES6b 'Contaminated Land and Development and Storage of Hazardous Substances';
 - ▶ ES7 'Waste management'; and
 - ▶ ES8 'Waste management Capacity'.
- 3.3.68 Significant positive effects are anticipated in relation to SA objective 1 'Equality'. Strategic Policy ES1 and Policy ES3 requires all developments to protect and enhance the natural environment, and Strategic Policy 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 directly contributes to this SA objective.
- 3.3.69 Significant positive effects are also anticipated for SA objective 2 'Liveability' and 3 'Health.' Policy 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, making a significant positive contribution to both SA objectives. Other policies also make a significant contribution to health, including those relating to urban greening (ES3) and contaminated land (ES6a).
- 3.3.70 Requiring development to achieve air quality neutral development will help achieve SA objective 5 'Transport and mobility' by encouraging modal shift.
- 3.3.71 All policies are assessed as having a significant positive effect in relating to SA objective 12 'Climate change mitigation and adaption. 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, minimise waste

generation and reduce flood risks, which is likely to increase resilience and reduce vulnerability to climate change impacts.

- 3.3.72 Positive effects are anticipated in relation to SA objective 13 'Biodiversity'. Strategic Policy ES1 and Policy ES3 require all developments to protect and enhance biodiversity, and in doing so Strategic Policy ES1 requires developments to increase access to nature and to contribute to meeting the objectives of the latest Tower Hamlets Biodiversity Action 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 connectivity, resulting in major positive effects on this SA objective.
- 3.3.73 All policies are assessed as making a significant positive contribution to SA objective 14 on natural resource use.
- 3.3.74 Positive effects are anticipated for SA objective 14. Strategic Policy ES1 and Policy ES4 set out a pro-active approach to flood risk management, which directs development away from flood risk areas and therefore minimises flood risks to people and property. Policy ES4 also sets out criteria to ensure surface run-off is kept within acceptable limits, especially within Critical Drainage Areas, and encourage the use of SUDS. As such these policies directly contribute to this SA objective through requiring flood risk and drainage to be managed sustainably.
- 3.3.75 Positive effects are anticipated for SA objective 16 'Contaminated Land' as Policy ES6b 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.
- 3.3.76 No suggestions for changes to policies in this section have been identified.

Transport and Connectivity

- 3.3.77 This section of the Draft Local Plan contains a set of policies relating to transport and connectivity, the policies set out the framework for future investment and the requirements for future development.
- 3.3.78 The section includes the following policies:
- ▶ Strategic Policy TRN1 'Sustainable Travel';
 - ▶ Policy TRN2 'Assessing the Impacts on the Transport Network';
 - ▶ Policy TRN3 'Parking and Permit – free'; and
 - ▶ Policy TRN4 'Sustainable Transportation of Freight'.
- 3.3.79 Strategic Policy TRN1 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 SA objective 1 'Equality'.
- 3.3.80 All the policies in this section require development proposals to safeguard, development and enhance the Borough's transport network, in particular the public transport system, and Strategic Policy TRN1 also directs high trip generating developments to highly accessible locations. The policies would therefore make a significant positive contribution to SA objectives 3 'Liveability', 5 'Transport' and 8 'Economic growth' 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.
- 3.3.81 Strategic Policy TRN1 makes a significant positive contribution to SA objective 3 'Health' through directing high trip generating developments to highly accessible location, which would both direct health, leisure and community facilities to highly accessible locations and further improve their accessibility, in particular using public transport. Policy TRN3 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 significant positive effect on this SA objective.

- 3.3.82 All policies in this section make a significant positive contribution to SA Objective 12 'Climate Change' as they set out criteria to safeguard, development and enhance the public transport system. In particular Strategic Policy TRN1 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 public transport system and either directly or indirectly would concentrate development in accessible locations and encourage sustainable modal shifts.
- 3.3.83 In relation to SA objective 14 'Natural Resources' Policy TRN2 sets out criteria to prevent unacceptable adverse traffic impacts, 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.
- 3.3.84 No suggestions for changes to policies in this section have been identified.

Planning Contributions

- 3.3.85 This section of the Local Plan Consultation document contains a policy relating to planning contributions.
- 3.3.86 The policy is assessed as making a positive contribution to a range of SA objectives, by securing investment for community facilities, open space, health facilities, affordable housing and employment and training facilities, public art, biodiversity, energy and sustainability infrastructure and transport and highways improvements that cannot be secured through other arrangements. It does this by providing a link between the Local Plan, policy documents in relation to planning contributions and future development.
- 3.3.87 No suggestions for changes to the policy were identified.

Are there any policy gaps?

- 3.3.88 Rather than just assess what is in the Draft Local Plan, the IIA team undertook an exercise to test the extent to which the SA objectives are covered by policies in the Plan and to see whether or not this identified any gaps in policy. Note as part of this exercise we are not making a judgement about the extent to which a policy is compatible with one or more objective, any such issues would be flagged up through the detailed assessment of policies outlined above. The results are summarised in **Table 3.3** below. On the basis of this analysis no policy omissions have been identified.

Table 3.3: Summary of relationship between the SA Objectives and Draft Policies

SA Objective	Relevant policies
1. Equality: Reduce poverty and social exclusion and promote equality for all communities	A range of policies relating to housing (Strategic policy H1, Policies H2, H4), employment (Strategic policy EMP1 and EMP2), community infrastructure (CSF1 and CSF2, Policies SG1, CSF3 to 9) and transport (Strategic Policy TRN1) will contribute towards this objective.
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	A range of policies relating to housing, town centres, community facilities and transport will contribute towards this objective.
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities	A number of policies will contribute towards this objective, e.g. SG1 DH9 in relation to noise pollution.

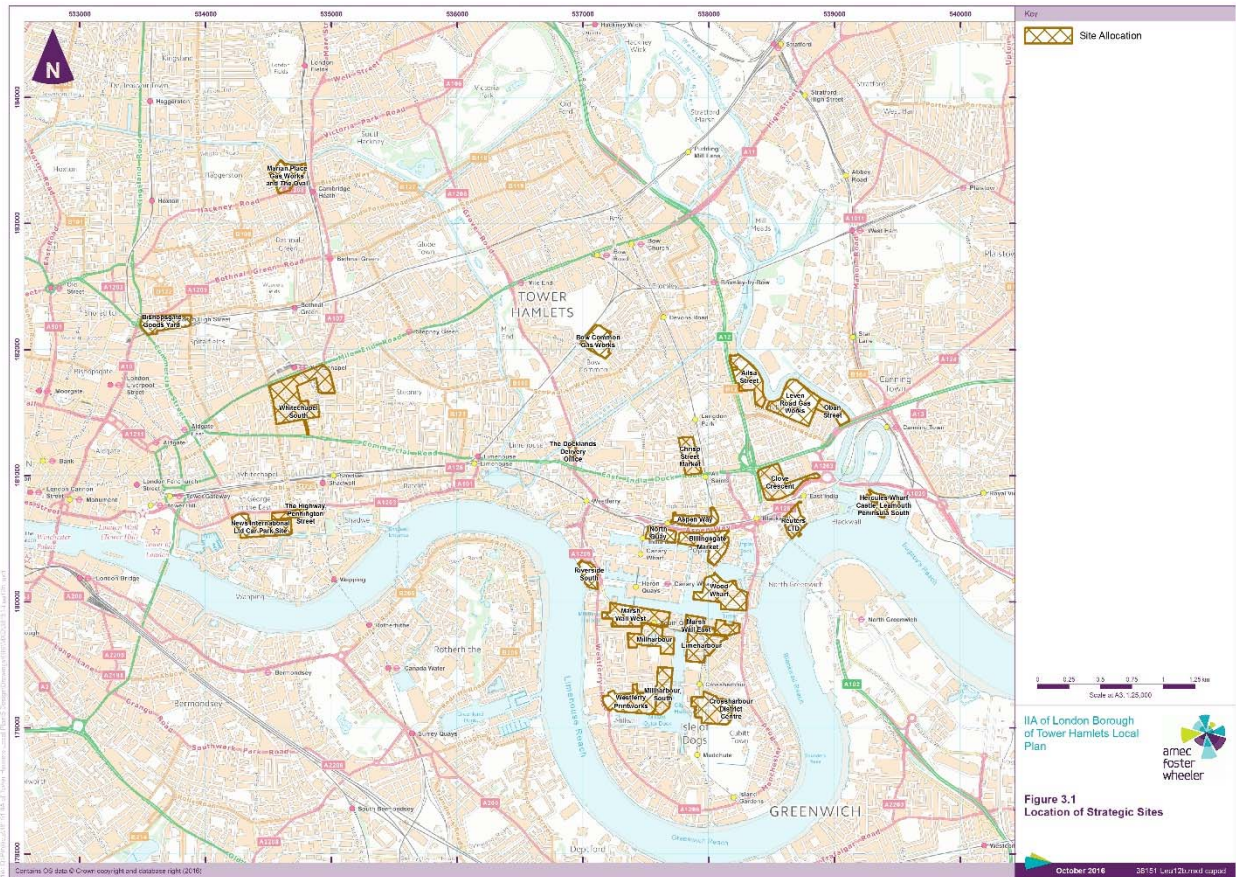
SA Objective	Relevant policies
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability	Strategic Policy H1 and Policies H2 to H6.
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	Strategic Policy TRN1 and Policies TRN2 to 5.
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.	Policies CSF.3 and CSF.4 will contribute towards the achievement of this objective.
7. Employment: Reduce worklessness and increase employment opportunities for all residents	Strategic Policies EMP1 and EMP2 Policy EMP3 – 5. Policies relating to improved public transport could also assist in terms of improving access to employment.
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	Strategic Policies EMP1 and EMP2 Policy EMP3 – 5.
9. Town Centres: Promote diverse and economically thriving town centres.	Strategic Policy TC.1, Strategic Policy TC.2, policies TC3 to TC5.
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	Strategic Policies DH1 and DH2. Policies DH2 to DH13.
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	Strategic Policy OS1, Policy OS3 and ES3 contribute to this objective.
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	Policy ES4 relates to flood risk. Other policies relating to climate change adaptation include Policy ES5 on sustainable water management. Policy ES6 relates to climate change mitigation.
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	Policy OS2 includes safeguards for biodiversity in relation to water space, Policy ES3 includes requirements in relation to terrestrial ecology. Open space policies and design policies will contribute to the landscape element of the objective.
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.	Policy ES5 relates to water, Policy ES6 relates to contaminated land, Policy ES2 relates to air quality and Policy ES5 relates to waste management.
15. Flood risk reduction and management: To minimise and manage the risk of flooding	Policy ES4 relates to flood risk.
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	Policy ES6 relates to contaminated land.

Appraisal of Strategic Sites

- 3.3.89 Twenty eight strategic sites have been included as proposed allocations within the Draft Local Plan (see **Figure 3.1**). Many are major sites identified in the Managing Development Document (April 2013). Two strategic sites are already under construction and therefore have not been appraised, as they form part of the baseline scenario:

- ▶ London Dock; and
- ▶ Wood Wharf.

Figure 3.1: Strategic Sites



3.3.90 Twenty six new strategic sites have therefore been subject to detailed sustainability appraisal against the sixteen SA objectives. The strategic sites have been appraised using tailored appraisal criteria and associated thresholds of significance. The site appraisal criteria and matrices which report the outcome of this assessment for each strategic site are presented at **Appendix K**. The findings of this appraisal are presented in **Table 3.4** and summarised thematically below.

3.3.91 **Table 3.4** indicates that the majority of the strategic sites would either have positive or neutral effects on the majority of the SA objectives, with the notable exceptions of SA objectives 10 'Cultural Heritage', 13 'Biodiversity' and 15 'Flood Risk'. The majority of the strategic sites give rise to potential negative effects on these objectives owing to their geographical situation relative to heritage assets, designated sites and flood risk areas respectively.

3.3.92 The appraisal scores for sites are pre-mitigation, recognising that there is **potential** for a significant effect. Whether or not an effect will happen will, in some cases be dependent on how a site is designed and the mix of uses agreed. So for example if the Council's requirements for a particular site include an Idea Store the site has been assessed on that basis. Where a site is appraised as having a potential significant negative effect in relation to SA objective 10 'Design and Heritage' because of proximity to a Conservation Area the actual effect 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 and where potential for a negative effect has been identified relevant policies that would help mitigate the potential for a negative effect are identified in the commentary below.

3.3.93 The following subsections highlight key thematic findings from the appraisal of strategic sites.

Regeneration (SA objectives 1 and 16)

- 3.3.94 SA objectives 1 and 16 respectively consider whether the strategic site allocations involve housing or employment proposals within areas with a high level of multiple deprivation and whether the allocations would involve the redevelopment of brownfield land and/or the remediation of potentially contaminated sites. As such these SA objectives seek to prioritise allocations which would concentrate investment in deprived areas, catalyse socio-economic renewal and delivery physical environmental regeneration.
- 3.3.95 The majority of the strategic sites are not located within the 50% most deprived Lower Super Output Areas (LSOAs) across the Borough, meaning that these sites achieve a neutral score against SA objective 1 'Equality' and would not significantly contribute to local socio-economic renewal. However, four strategic sites (Ailsa Street, Crisp Street Market, Leven Road Gas Works and Oban Street) would have a major positive effect on SA objective 1 as they are located within the 10% most deprived LSOAs and are proposed for residential and/or employment land allocations, meaning that the development of these strategic sites could increase economic opportunities and reduce poverty (and fuel poverty) within these areas.
- 3.3.96 All of the strategic sites are either located on existing brownfield or vacant land or have existing buildings and uses which would be replaced by new development proposals. Therefore all of the strategic sites score positively against SA objective 16, 'Contaminated Land' as they would all involve redevelopment, which depending on previous site uses could result in contaminated land remediation. In particular, three of the strategic sites currently accommodate gas works and a fourth is a former print works, so due to the historic industrial processes undertaken at these sites there is the potential for contamination to be present.

Proposed Land Uses (SA objectives 4 and 7)

- 3.3.97 SA objectives 4 and 7 respectively consider whether the strategic site allocations would contribute to the Borough's housing or employment land supplies over the Local Plan period. SA objective 4 'Housing' uses a threshold of 500 net new residential units to differentiate between predicted minor and major positive effects on SA objective, whereas SA objective 7 'Employment' only considers whether or not the proposed site allocation included employment uses, because the scale of any employment provision at a site is uncertain at this time.
- 3.3.98 All but two of the strategic sites include proposed housing allocations, meaning that these sites directly contribute positively to SA objective 4 'Housing' through the provision of new residential units. In particular, twelve of the allocations each include over 500 new residential units and in total, excluding sites already under construction (which are excluded from this SA), the strategic sites are expected to deliver a minimum capacity of 13,700 new residential units (rounded to nearest integer and included a conservative estimate of 500 units for Millharbour South). No information is available at this stage regarding the mechanisms, tenure or phasing of housing delivery on each site, however due to the large-scale of housing proposed it is expected that housing would need to be delivered on a phased basis throughout the Local Plan period. In relation to tenure it is assumed that this would be controlled through development management policies, principally policies H1 and H2, rather than through individual site allocations.
- 3.3.99 According to the information available at this stage in the Local Plan preparation process, six of the sites include proposed employment allocations. Other strategic sites have extant planning permissions for mixed use developments including employment uses, albeit their currently proposed site allocations do not reference employment uses. As preparation of the Local plan advances further clarity will be required regarding the location and parameters of proposed mixed use and employment related land allocations.
- 3.3.100 The majority of the strategic sites currently host industrial, retail, commercial or other employment uses, which could be lost or otherwise adversely affected by redevelopment and change of use proposals. This would negatively affect the net land use effects of the strategic sites, in particular where an existing economically productive site would be replaced by residential development. The

Draft Local Plan includes policies to ensure that any affected businesses are provided for on-site or elsewhere in the Borough unless it can be shown that the needs of the business are better met elsewhere (Policy EMP5).

Public and Community Services and Facilities (SA objectives 2, 3 and 6)

- 3.3.101 SA Objectives 2 'Liveability', 3 'Health' and 6 'Education' consider whether new community, healthcare and/or education facilities would be provided within development proposals for each of the strategic sites.
- 3.3.102 The majority of the proposed strategic site allocations require development proposals to include a range of onsite facilities: 13 strategic sites would deliver new schools; 6 would deliver new healthcare facilities; and 4 would deliver new or upgraded Idea Stores or leisure facilities. In line with SA objectives 2 'Liveability', 3 'Health' and 6 'Education' this would ensure that these strategic sites incorporate the facilities required to make development proposals acceptable in planning terms and contribute to the wider spatial development of neighbourhoods. In particular the provision of 13 new schools would allow the Council to continue to fulfil their statutory education duties in the context of projected substantial population growth and could also provide accessible facilities to support community activities and adult learning opportunities outwith of school hours.
- 3.3.103 Seven of the strategic sites do not currently include requirements to provide onsite community, healthcare and/or education facilities. However, any development proposals brought forward for these sites would still need to satisfy relevant development management policies, and given the scale of the sites it is expected that developer contributions (or onsite provision in lieu of contributions) towards infrastructure improvements, in particular new or extended schools, may be required to make development proposals acceptable in planning terms. These seven strategic sites have therefore been appraised as having neutral effects on SA objectives 2, 3 and 6, as any potential negative effects would be mitigated through planning policy requirements.

Accessibility (SA objective 5)

- 3.3.104 SA objective 5 – 'Transport and Mobility' considers accessibility, based solely on the Public Transport Accessibility Level (PTAL) rating assigned by Transport for London to the locality within which each strategic site is located. The PTAL rating provides a relative measure of proximity to frequent public transport services. Therefore this SA objective is relative rather than absolute and focuses on existing public transport provision, rather than also considering wider potential effects, e.g. effects on the local road network or transport infrastructure provision.
- 3.3.105 **Table 3.4** indicates that the strategic sites would have a range of effects in relation to this SA objective: 3 sites are located within areas with the highest PTAL ratings and therefore score highly; 3 are located within areas with the lowest PTAL ratings and therefore score poorly; and all other sites are situated in localities with intermediate PTAL ratings. Regardless of their PTAL rating all development proposals would need to accord with relevant development management policies, which due to the scale of these sites could require transport assessments to be undertaken and, where transport infrastructure deficiencies are identified, could require development proposals to include local transport infrastructure improvements or contribute to strategic transport infrastructure upgrades, in accordance with Strategic Policy TRN1 'Sustainable Travel,' TRN2 Assessing the Impacts on the Transport Network.' Therefore the relative and actual accessibility of development proposals on individual strategic sites would need to be determined through the planning application process; at this stage in the Local Plan preparation process the PTAL ratings merely provide an indication of the existing relative accessibility of each strategic site.

Economic Growth and Town Centre Vitality (SA objectives 8 and 9)

- 3.3.106 SA objective 8 'Economic Growth' considers whether the allocation proposed for each strategic sites would support, increase or result in the loss of employment uses within designated employment and industrial areas, as defined within the Draft Local Plan. Similarly SA objective 9 'Town Centres' considers whether proposals allocations would increase or adversely affect

designated Town Centres, as defined within the Draft Local Plan, though locating main town centre uses, as defined within the NPPF (2012) within or outwith Town Centres.

- 3.3.107 The majority of the strategic sites (excluding those under construction and not subject to SA) would have a neutral effect on SA objectives 8 and 9 by virtue of not including employment or main town centre uses within the proposed site allocation and not being located within a defined Town Centre or designated employment area. Two strategic site allocations (Billingsgate Market and Bow Common Gas Works) would have a significant negative effect on SA objective 8, in the absence of mitigation, through replacing existing employment uses with residential development whilst four strategic site allocations would have a significant positive effect through providing new employment uses within defined employment areas. Three strategic site allocations would have an uncertain effect on SA objective 8 as they would provide new employment, but not town centre, uses outwith defined employment areas or Town Centres. The Council has confirmed that employment will be sought on sites through the general policies of the plan, including sites where there is existing employment. The appraisal of sites will be revised accordingly prior to the SA being finalised for consultation.

Open Space (SA objective 11)

- 3.3.108 SA objective 11 'Open Space' considers whether the strategic site allocations include the delivery of strategic-scale or local open spaces. The Draft Local Plan defines strategic open space as extending to at least 1.2ha, so sites with a total area less than 1.2ha but which do include proposed open space uses are only considered to provide local open space (a minor positive effect). Sites that are anticipated to contribute strategic open space are assessed as having a significant positive effect on the objective.
- 3.3.109 All of the strategic site allocations require development proposals to incorporate open space provision and therefore achieve positive scores against SA objective 11. In addition, regardless of the open space requirements detailed within individual proposed allocations, all development proposals would need to accord with relevant development management policies, including those which set minimum standards for the quantity and quality of open space provision. In particular development management policies would require proposed open spaces to be useable and of a high quality, which would relate to the general placemaking principles set out for each of the strategic site allocations.

Flood Risk (SA objective 15)

- 3.3.110 SA objective 15 considers the existing flood risk affecting each of the strategic sites. The objective does not take account of proposed uses or potential flood risk alleviation measures required through Draft Local Policy ES4, rather it merely identifies the level of existing flood risk. As such SA objective 15 indicates which strategic sites are likely to require flood risk assessments (including consideration of NPPF sequential and exception tests) to be completed and, if required, flood risk mitigation measures to be incorporated within development proposals.
- 3.3.111 All but five of the strategic sites are located within flood risk areas (either Flood Risk Zone 2 or 3), and therefore score poorly against SA objective 15. Flood risks affecting the strategic sites are primarily associated with fluvial flooding from the River Thames, which bounds many of the proposed waterfront and quayside strategic site allocations, as well as pluvial flood risks resulting from limited surface water run-off pathways within a highly urbanised environment. However, five of the strategic sites are not located within Flood Risk Zones 2 or 3 (i.e. they are within Flood Zone 1) and therefore achieve positive scores against SA objective 15.

Environmental Effects

- 3.3.112 SA objective 10 'Design and Heritage' considers the relationship between the strategic site allocations and designated heritage assets, whilst SA objective 13 considers the proximity of the strategic sites to sites designated for reasons of biodiversity conservation or ecological protection. As such these objectives assess potential effects from development on cultural and natural heritage assets. However, at this stage of the Local Plan preparation process the appraisal has

necessarily focused on the proximity of strategic sites to relevant assets and designations, as insufficient information is currently available regarding potential specific impacts from development proposals of these receptors, as well as potential mitigation measures.

- 3.3.113 In relation to SA objective 10 the SA appraisal framework includes positive scoring criteria for allocations which have the potential to bring designated heritage assets back into use. However, due to the limited information and development requirements detailed within the proposed site allocations, in practice only Bow Common Gas Works can currently be scored positively against SA objective 10, as this allocation explicitly requires onsite heritage assets to be protected. Seven of the strategic sites have been assessed as having a potential significant negative effect and seven have been assessed as having a minor negative effect on SA objective 10, in all cases due to the presence of designated heritage assets within the site boundaries. Policy SG1 'Sustainable Growth in Tower Hamlets' sets out key principles that would inform applications and policies on design and heritage provide more detailed policy considerations.
- 3.3.114 No sites designated at a national or international level for reasons of biodiversity conservation are located within 500m of the strategic sites, however twenty three of the strategic site allocations are located within 100m of locally designated sites, primarily Local Nature Reserves (LNRSs) and Sites of Interest for Nature Conservation (SINCs) and therefore could have a minor negative effect on SA objective 13 in the absence of mitigation. The draft Local Plan includes Policies ES3 'Urban Greening and Biodiversity' and Strategic Policy OS2 'Enhancing Water Spaces' that should ensure that adequate avoidance and mitigation measures are put in place. Three of the strategic sites (Aspen Way, Chrisp Street and Whitechapel South) are not located within 100m of locally designated sites and therefore have been assessed as having a neutral effect on SA objective 13 'Biodiversity.'
- 3.3.115 All of the strategic sites have been assessed as having a neutral effect on SA objectives 12 'Climate Change' and 14 'Natural Resources' owing to the influence of external factors, e.g. the requirements for development management planning policies, and the lack of availability of detailed information at this stage regarding the treatment of climate change and natural resource issues on a site by site basis. Given the strategic nature of these sites it is considered that it would be more appropriate to consider detailed requirements to address SA objectives 10 and 14 within site specific development frameworks and/or masterplans, which should be prepared in advance of the determination of relevant planning applications.

Table 3.4 Summary of SA of Strategic Site Allocations (Pre-Mitigation)

Site Name	Site Area (ha)	SA Objective															
		1 Equality	2 Liveability Community	3 Health and Wellbeing	4 Housing	5 Transport and Mobility	6 Education	7 Employment	8 Economic Growth	9 Town Centres	10 Heritage	11 Open Space	12 Climate Change	13 Biodiversity	14 - Natural Resources	15 Flood Risk	16 Contaminate
Ailsa Street	5.76	++	0	0	++	-	++	0	0	0	-	++	0	-	0	-	++
Aspen Way	2.89	+	0	0	++	+	0	0	0/?	0	-	++	0	0	0	-	+
Billingsgate Market	5.74	0	0	0	++	+	++	0	-	0	-/?	+	0	-	0	-	++
Bishopsgate Goods Yard	4.46	0	+	0	++	++	0	+	++	+	-/?	++	0	-	0	++	+
Bow Common Gas Works	3.94	+	0	0	+	-	++	0	-	0	+/?	++	0	-	0	-	+
Chrip Street Market	3.62	++	+	0	++	+	0	+	0	+	-	+	0	0	0	-	+
Clove Crescent	6.12	0	0	++	0	+	++	+	+	0	-/?	++	0	-	0	-	++
Crossharbour District Centre	6.06	0	+	++	++	+	++	0/?	0	++	0	+	0	-	0	-	++
Hercules Wharf	2.57	0	0	0	+	-	0	0	0	0	-	++	0	-	0	-	+
Leven Road Gas Works	8.56	++	0	0	++	-	++	0/?	0	0	-	++	0	-	0	-	++
Limeharbour	5.07	0	0	0	++	+	++	0	0	0	0	++	0	-	0	-	++
Marian Place Gas Works and The Oval	4.41	+	0	0	+	+	++	0	0	0	-/?	++	0	-	0	++	+
Marsh Wall East	3.61	0	0	++	+	+	0	0	0	0	0	++	0	-	0	-	+
Marsh Wall West	6.83	0	0	++	++	+	++	+	0	++	0	++	0	-	0	-	++
Millharbour	5.05	+	0	++	+	+	++	+	0	++	0	++	0	-	0	-	++
Millharbour South	4.09	0	0	0	++	-	++	+	0	+	0	++	0	-	0	-	++
North Quay	2.22	0	0	0	++	+	0	+	++	+	0	++	0	-	0	-	+
Oban Street	2.35	++	0	0	+	-	0	0	0	0	-	++	0	-	0	-	+
Reuters LTD	2.71	0	0	0	+	+	++	0	0	0	-/?	++	0	-	0	-	+
Riverside South	2.17	0	0	0	+	-	0	+	++	+	0	++	0	-	0	-	+
The Docklands Delivery Office	0.54	+	0	0	0	++	0	0	0	0	-	+	0	-	0	++	+

Site Name	Site Area (ha)	SA Objective															
		1 Equality	2 Liveability Community	3 Health and Wellbeing	4 Housing	5 Transport and Mobility	6 Education	7 Employment	8 Economic Growth	9 Town Centres	10 Heritage	11 Open Space	12 Climate Change	13 Biodiversity	14 - Natural Resources	15 Flood Risk	16 Contaminate
The Highway, Pennington Street	1.52	0	0	0	+	+	0	0	0	0	-	+	0	-	0	++	+
Westferry Printworks	6.40	0	+	0	++	-	++	0	0	0	0	++	0	-	0	-	++
Whitechapel South	12.72	+	0	0	0	++	0	+	+	+	-/?	++	0	0	0	++	++

3.4 Cumulative, Synergistic and Secondary Effects of Policies and Sites

- 3.4.1 The matrices for each section at **Appendix J** identify those instances where potential cumulative effects are anticipated, including synergistic effects.
- 3.4.2 A summary of potential cumulative effects from each group of draft policies upon each SA objective, together with a commentary outlining specific predicted cumulative effects, is provided in **Table 3.5**. Potential cumulative effects have been identified through professional judgement having regard to the overall performance of policies and how they might interact against specific SA objectives.
- 3.4.3 **Table 3.5** indicates that in overall terms the majority of the draft policy groupings are considered to contribute positively to each of the SA objectives. However, the strength and nature of the relationship varies between policy groupings and there is no clear relationship between some policy groupings and some individual objectives. The final column of Table 3.5 also outlines the nature of potential interactions and cumulative or synergistic effects between the draft policy groupings.
- 3.4.4 Consideration has also been given to the potential for cumulative effects associated with strategic sites in **Table 3.5**. This demonstrates the potential for positive cumulative effects associated with SA objective 1 'Equality' as a number of sites fall within areas of high deprivation within the Borough. Sites are also assessed as having a positive cumulative effect in relation to SA objectives 3 'Health and Wellbeing,' 4 'Housing,' 6 'Education' and 11 'open space' as sites will help deliver new homes and infrastructure to serve needs across the Borough. The strategic sites will help deliver significant growth that could help support existing centres and overall a significant positive effect is identified against SA objective 9 'Town Centres.' All sites involve the re-use of previously developed land and buildings, which could include addressing a legacy of contaminated land, a significant positive effect against SA objective 16 on contaminated land.

Table 3.5 Potential Cumulative and Synergistic Effects from Draft Policies

SA Objectives	Draft Policy Groupings										Potential Cumulative and Synergistic Effects	
	Draft Sustainable Growth Policies	Draft Housing Policies	Draft Employment Policies	Draft Town Centre Policies	Draft Community Facilities Policies	Draft Design and Historic Environment Policies	Draft Transport Policies	Draft Environmental Sustainability Policies	Draft Open Space Policies	Draft Developer Contributions Policy		Strategic Sites
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	0	++	++/?	++	++	0	0	+	++	+	++	The draft housing, employment, town centre and open space policies all direct development proposals to highly accessible locations, allowing a range of demographic groups to access facilities, services, employment and housing, and thereby reducing social exclusion. The co-location of these land uses within highly accessible locations, in particular within town centres and at public transport hubs, would result in a major positive synergistic effect on this SA objective, as new developments would be accessible to each other as well as to existing housing and community facilities. Strategic sites contribute positively to this objective and a significant cumulative positive effect against this objective is anticipated.
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	++	++	0	0	++	++	++	+	++	+	0	With the exception of the draft employment and town centre policies, which in overall terms are not directly relevant to this SA objective, all other draft policy groupings direct development proposals to accessible locations, require development proposals to include adequate and high quality community and social infrastructure, and require development proposals to safeguard amenity. Acting together the policy groupings would therefore ensure that development proposals demonstrate good placemaking by providing suitable access to a range of land uses and facilities in appropriate locations and by enhancing the quality of the built environment. This would directly increase the liveability of neighbourhoods and therefore have a positive synergistic effect on this SA objective. Strategic sites could help deliver this objective but overall it is considered that the potential for significant effects has been identified elsewhere in the assessment.
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	+	++	+	+	++	++	+	++	++	+	++	There is potential for the draft community facilities and open space policies to work in synergy with the draft housing policies to contribute towards the liveability aspects of this SA objective, resulting in a significant positive effect. In particular, Strategic Policy CSF2 highlights that where no longer a need for a specific community facility, a site could be used for affordable housing provision, which would support the delivery of the affordable housing strategy detailed in policies H1 and H2. Strategic sites will help deliver new health facilities, contributing positively to this objective.

SA Objectives	Draft Policy Groupings										Potential Cumulative and Synergistic Effects	
	Draft Sustainable Growth Policies	Draft Housing Policies	Draft Employment Policies	Draft Town Centre Policies	Draft Community Facilities Policies	Draft Design and Historic Environment Policies	Draft Transport Policies	Draft Environmental Sustainability Policies	Draft Open Space Policies	Draft Developer Contributions Policy		Strategic Sites
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	0	++	0	0	++	0	0	0	++	+	++	There is potential for the draft community facilities and open space policies to work in synergy with the draft housing policies to contribute towards the liveability aspects of this SA objective, resulting in a significant positive effect. In particular, Strategic Policy CSF2 highlights that where no longer a need for a specific community facility, a site could be used for affordable housing provision, which would support the delivery of the affordable housing strategy detailed in policies H1 and H2. Strategic sites will help deliver new housing, contributing positively to this objective.
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	+	+	++	++	++	+	++	+	++	+	?	With the exception of the draft sustainable growth policies, which in overall terms do not have a major effect on this SA objective, all other draft policy groupings direct development proposals to highly accessible locations and require active travel infrastructure to be provided. Acting together this would ensure that new developments are both accessible and contribute to the wider development of more sustainable transport networks, resulting in a minor positive synergistic effect on this SA objective. Sites have been assessed on their PTAL rating, resulting in a range of scores. General policies in the Draft Local Plan require development to deliver improvements to transport infrastructure which strategic sites could help deliver but an uncertain effect has been identified at this stage.
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.	0	+	+	0	++	0	0	0	+	+	++	Specific policies within the draft housing, community facilities and, to a lesser extent, open space policy groupings, contribute to this SA objective and could result in positive cumulative effects. In particular, policy H1 requires residential development proposals not to result in over-development and Strategic Policy CSF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new, social infrastructure. Acting together these policies would ensure that residential development proposals avoid increasing pressure on existing education infrastructure and where relevant also provide new facilities, which would increase access to education opportunities. A number of sites will help deliver new education facilities, contributing to this objective.
7. Employment: Reduce worklessness and increase employment opportunities for all residents	0	+	++	+	+	0	0	0	0	+	?	The draft housing, employment and town centre policy grouping all direct development proposals to highly accessible locations. The co-location of these land uses, in particular within town centres and at public transport hubs, would result in a positive synergistic effect on this SA objective as new employment

SA Objectives	Draft Policy Groupings										Potential Cumulative and Synergistic Effects	
	Draft Sustainable Growth Policies	Draft Housing Policies	Draft Employment Policies	Draft Town Centre Policies	Draft Community Facilities Policies	Draft Design and Historic Environment Policies	Draft Transport Policies	Draft Environmental Sustainability Policies	Draft Open Space Policies	Draft Developer Contributions Policy		Strategic Sites
												<p>developments would be accessible to both existing communities and new residential developments, thereby enhancing physical access to employment. However, none of the draft policies seek to tackle other barriers to employment or to reduce worklessness.</p> <p>The strategic sites will help deliver significant growth that could help support economic growth but their contribution to growth through the provision of new employment floorspace is uncertain.</p>
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	0	++	++	++	++	+	++	+	0	+	?	<p>All of the draft policy groupings seek to support economic growth, either directly through encouraging new economic uses in appropriate locations, or indirectly through setting out criteria to deliver increased housing provision, supporting infrastructure and high quality built environments. In particular, the draft housing, employment, town centre and transport policies all set out criteria to safeguard and support new investment, encourage economic diversification and direct new housing and employment uses to highly accessible locations. Acting together these policies would create appropriate conditions to allow economic growth in a sustainable manner and would therefore have a positive effect on this SA objective.</p> <p>The strategic sites will help deliver significant growth that could help support economic growth but their contribution to growth through the provision of new employment floorspace is uncertain.</p>
9. Town Centres: Promote diverse and economically thriving town centres.	0	+	+	++	+	++	+	+	+	+	++	<p>All of the draft policy groupings direct development proposals to highly accessible locations, in particular within the town centre hierarchy, and set out criteria to avoid the over-concentration of uses with potential negative impacts. Acting together the policies would co-locate development proposals within the Borough's Town Centres and therefore protect and increase their vitality and vibrancy, resulting in a positive cumulative effect on this SA objective. In addition there is a potential interaction between the draft town centre and employment policy groupings, as some of the defined town centres and designated employment areas, which the respective policies direct development proposals to, overlap.</p> <p>A range of effects were identified in relation to this objective for strategic sites, depending on the nature of development and the location of sites in relation to town centres. The strategic sites will help deliver significant growth that could help support existing centres and overall a significant positive effect is identified.</p>

SA Objectives	Draft Policy Groupings										Potential Cumulative and Synergistic Effects	
	Draft Sustainable Growth Policies	Draft Housing Policies	Draft Employment Policies	Draft Town Centre Policies	Draft Community Facilities Policies	Draft Design and Historic Environment Policies	Draft Transport Policies	Draft Environmental Sustainability Policies	Draft Open Space Policies	Draft Developer Contributions Policy		Strategic Sites
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	0	0	0	0	0	++	0	+	++	?	?	<p>The draft design and historic environment, open space and environmental sustainability policy groupings require development proposals to be appropriately designed and integrated with their surroundings, as well as to mitigate predicted environmental and amenity impacts. These policy groupings interact and directly seek to improve the quality of the built environment, although no specific synergistic effect is predicted.</p> <p>In the absence of mitigation, the assessment of strategic sites identified the potential for negative effects in relation to this objective. There are general policies in the Draft Local Plan that seek to ensure that development does not adversely affect heritage features but the cumulative effects of development are judged to be uncertain at this stage.</p>
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	0	0	0	0	+	++	0	+	++	+	++	<p>The draft community facility, design and historic environment, environmental sustainability, open space and developer contributions policy groupings all set out interacting requirements for the safeguarding and provision of high quality open spaces within development proposals. In particular the interaction of policy criteria regarding open space provision, quality and useability would generate a positive synergistic effect on this SA objective through enhancing the Borough's network of open spaces.</p> <p>Strategic sites will help contribute to this objective by delivering open space, including strategic open space.</p>
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	+	+	0	+	++	+	++	++	+	+	0	<p>With the exception of the draft sustainable growth policies, which in overall terms do not have a major effect on this SA objective, all other draft policy groupings direct development proposals to highly accessible locations and require active travel infrastructure (including high quality public realm) to be provided. The co-location of new developments in accessible locations with active travel infrastructure would reduce the need for car travel and encourage sustainable modal shifts, thereby reducing greenhouse gas emissions. In addition the draft design & historic environment policies set out interacting criteria to minimise energy use across the lifetime of new developments, which would also contribute to climate change mitigation.</p> <p>Performance against this objective at the site level was judged to be neutral and potential significant effects associated with general policies that will contribute to the achievement of this objective have been captured elsewhere in the assessment.</p>

SA Objectives	Draft Policy Groupings										Potential Cumulative and Synergistic Effects	
	Draft Sustainable Growth Policies	Draft Housing Policies	Draft Employment Policies	Draft Town Centre Policies	Draft Community Facilities Policies	Draft Design and Historic Environment Policies	Draft Transport Policies	Draft Environmental Sustainability Policies	Draft Open Space Policies	Draft Developer Contributions Policy		Strategic Sites
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	+	+	0	0	0	+	0	+	++	+	?	<p>The draft sustainable growth, housing, design & historic environment, environmental sustainability, open spaces and developer contributions policy groupings all set out criteria to ensure that development proposals are appropriately sited, high-quality, well-designed and sustainable. All of these policy groupings therefore require consideration of amenity and environmental/pollution impacts within the design and determination of development proposals, which in general terms could help to conserve and enhance habitats and biodiversity. In addition, the open space requirements within these policy groupings would help to conserve, enhance and improve connectivity between a range of habitats, with consequential positive cumulative effects on biodiversity.</p> <p>In the absence of mitigation the potential for minor negative effects was identified at the site level in the majority of cases. The potential for cumulative effects is uncertain – although general polices in the Local Plan should contribute to the achievement of positive outcomes in relation to Biodiversity.</p>
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	+	+	+	+	0	+	+	++	++	~	?	<p>All of the draft policy groupings direct development proposals to highly accessible locations and seek to create liveable neighbourhoods. The co-location of developments in accessible locations could indirectly safeguard air quality by reducing car travel needs and encouraging sustainable modal shifts, resulting in a positive synergistic effect on this SA objective.</p> <p>Performance against this objective at the site level was judged to be neutral but, given the scale of development in the Borough the overall effect in relation to this objective is judged to be uncertain.</p>
15. Flood risk reduction and management: To minimise and manage the risk of flooding	+	0	0	0	0	++	0	+	+	+	0	<p>The draft design & historic environment, environmental sustainability and open space policy groupings set out interacting requirements for the safeguarding and provision of high quality open spaces, which could help to sustainably manage surface-ruff off and therefore reduce flood risks. However, no specific cumulative or synergistic effects are predicted.</p> <p>Areas of the Borough are at risk of flooding and a number of sites are in flood risk areas. The potential for negative effects has been identified on a site by site basis. The cumulative effects of development should not be significant if each site addresses the need for attenuation and storage and defences.</p>

SA Objectives	Draft Policy Groupings										Potential Cumulative and Synergistic Effects	
	Draft Sustainable Growth Policies	Draft Housing Policies	Draft Employment Policies	Draft Town Centre Policies	Draft Community Facilities Policies	Draft Design and Historic Environment Policies	Draft Transport Policies	Draft Environmental Sustainability Policies	Draft Open Space Policies	Draft Developer Contributions Policy		Strategic Sites
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	++	+	+	0	0	0	0	+	++	?	++	<p>Given that development in the Borough would predominantly involve the use of previously developed land and buildings, which if contaminated would require appropriate remediation, the draft housing and employment policy groupings are likely to have an indirect positive effect on this SA objective. However, no cumulative or synergistic effects are predicted.</p> <p>All sites involve the re-use of previously developed land and buildings, which could include addressing a legacy of contaminated land, a significant positive effect.</p>

3.5 Key Findings from the HIA

- 3.5.1 The HUDU Rapid HIA Assessment Matrix is at **Appendix I**.
- 3.5.2 Section 1 of the matrix relates to housing quality and design and promotes the use of the 'Lifetime Homes Standard and Building Regulation M4 (2)'. The Lifetime Homes standard is a voluntary set of 16 design criteria that provide a model for building accessible and adaptable homes. 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.
- 3.5.3 The Government has created 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.
- 3.5.4 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 Planning Guidance.
- 3.5.5 The following policies in the draft Local Plan are relevant to section 1 of the matrix:
- ▶ Policy 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).
 - ▶ Policy H4 relates to the protection and provision of specialist housing
 - ▶ Strategic Policy H1 encourages the use of the Home Quality Mark, which will be a voluntary scheme to replace the Code for Sustainable Homes. The Home Quality Mark, is more comprehensive in scope than the Lifetime Home Standards.
- Given the Ministerial Statement of 25th March 2015 the Council is limited to what it can require. The Local Plan must also be in conformity with the London Plan. The Draft Local Plan encourages the use of the Housing Quality Mark but can only do so on a voluntary basis. The reference to the Home Quality Mark could be in Policy SG1 itself, rather than just the supporting text as this would give it more prominence. Policies H3 and H4 also seek to secure and protect accessible and adaptable housing.
- 3.5.6 Section 2 of the matrix relates to 'Access to healthcare and other social infrastructure'. 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. Completion of the matrix highlights the need to keep the model under review as the Council and GLA work towards agreeing housing and employment targets to 2031. This will help ensure that positive outcomes are associated with criteria in the matrix relating to community facilities and infrastructure.
- 3.5.7 Section 3 of the matrix relates to 'Access to open space and nature'; Section 4 relates to 'Air quality, noise and neighbourhood amenity;' and section 5 relates to 'Accessibility and active travel'. Positive outcomes are anticipated in respect of all three sections and no suggestions for changes to the policies in the Draft Local Plan were put forward. Although it was suggested that TRN1 could reference the Walking Plan for Tower Hamlets (2011-2021) and Cycling Plan for Tower Hamlets (2009).
- 3.5.8 Section 6 of the matrix relates to 'Crime reduction and community safety' and includes focuses on whether the assessed proposal incorporates elements to design out crime. Policy DH5 'Streets and the Public Realm' does require development to improve safety and perception of safety to pedestrians including elements to design out crime and fear of crime. A recommendation arising from the HIA is that the Local Plan could reference designing out crime principles more generally,

e.g. Secured by Design (Association of Chief Police officers. Secured by Design, New Homes 2010).

- 3.5.9 Positive outcomes were identified in relation to the following sections 7 'Access to healthy food;' 8 'Access to work and training;' 10 'Minimising the use of resources'; and 11 Climate change.'
- 3.5.10 Section 9 on 'Social cohesion and lifetime neighbourhoods' references the six key components of Lifetime Neighbourhoods, which are taken from Government research, (Lifetime Neighbourhoods, Department for Communities and Local Government, December 2011). These are:
- ▶ Empowering residents to develop lifetime neighbourhoods – especially resident empowerment
 - ▶ Access – enabling residents to connect with services and facilities, both physically and virtually;
 - ▶ Services and amenities – a mix of residential, employment and retail uses;
 - ▶ 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;
 - ▶ 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;
 - ▶ Housing – a range of choices, inclusive design principles and homes designed to meet changing needs.
- 3.5.11 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.
- 3.5.12 Although the Local Plan does not use the term 'Lifetime Neighbourhoods' it is clear from a review of the principles that policies in the Local Plan are consistent with the principles. Relevant policies include:
- ▶ Policy SG1 '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;
 - ▶ Strategic Policy TRN1 'Sustainable Travel' is consistent with the principle relating to access;
 - ▶ Strategic Policy CSF1 'Supporting Community, Cultural and Social Facilities' seeks to protect existing community facilities and provide new ones – providing opportunity for social networking and access to services and amenities;
 - ▶ Strategic Policy H1 'Delivering Housing' is consistent with the principle relating to housing.
- 3.5.13 The results suggest that policies will help to secure development that will contribute to a range of positive effects. These relate to factors like housing, transport and mobility, access to healthy food; access to work and training; minimising the use of resources; and climate change. A recommendation arising from the HIA is that the Local Plan could reference designing out crime principles more generally, e.g. Secured by Design (Association of Chief Police officers. Secured by Design, New Homes 2010).
- 3.5.14 The justification for Policy TRN1 could reference the Walking Plan for Tower Hamlets (2011-2021) and the Cycling Plan for Tower Hamlets (2009).

3.6 Key Findings from the EqlA

- 3.6.1 As noted in Section 2.10 of this report, the Council has developed a two stage approach to the analysis of equality issues. The first stage involves completion of a Quality Assurance Checklist. The checklist is a tool to assess whether the requirement that due regard is given to minority groups in the decision-making and activities of the Council is embedded and evidenced. Further analysis may be undertaken as a natural progression from the Quality Assurance when there are concerns about the impacts of the 'proposal' and, or, evidencing of 'due regard' requirements.

- 3.6.2 Question 1 of the QA checklist asks if the outcome of the Draft Local Plan are clear. The response notes that there is some uncertainty at this stage in the plan preparation process because the full extent and location of development to 2031 is uncertain as the Local Plan is still in development. Relevant aspects of the Draft Local Plan are considered below.
- 3.6.3 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 embeds the One Tower Hamlets principles into Policy SG1 'Sustainable Growth in Tower Hamlets.'
- 3.6.4 The two key objectives are 1) managing growth and shaping change and 2) spreading 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 need, which will include the needs of those who share Protected Characteristics. 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. The vision and key objectives are supported by a suite of policies, which include:
- ▶ Policy SG1 'Sustainable Growth in Tower Hamlets' which includes the need for Major Developments and Estate Regeneration Schemes thorough and inclusive public consultations, and the delivery of the One Tower Hamlets principles by creating mixed and balanced communities, incorporating inclusive design principles, local training and employment opportunities and infrastructure and public realm improvements that are accessible to all.
 - ▶ Strategic Policy H1 'Delivering Housing' sets out requirements in relation to the provision of affordable housing;
 - ▶ Policy H2 'Affordable Housing Communities' which seeks to secure a range of housing;
 - ▶ Policy H4 relates to the protection and provision of specialist housing;
 - ▶ Policy H5 'Gypsies and Travellers, is a criteria based policy on the future provision of accommodation for the Gypsy and Traveller community, it also safeguards an existing site;
 - ▶ A range of policies seek to ensure access to facilities and services, including public transport, health facilities, education, places of worship and community facilities, e.g.
 - Strategic Policy CSF1 'Supporting Community, Cultural and Social Facilities'
 - Strategic Policy CSF2 'Safeguarding Community Facilities,
 - CSF4 'Schools and Lifelong Learning'
 - CSF5 'Health and Medical Facilities,'
 - CSF7 'Community Centres and Places of Worship,'
 - CSF8 Cultural Facilities,
 - TRN1 'Sustainable Travel'
- 3.6.5 The Local Plan identifies strategic sites that can meet development needs to 2031 but the quantum of development required to 2031, particularly housing, will be established as the Plan develops. A detailed review of Local Plan policies has been undertaken and has not identified any instances where the content of policies would give rise to adverse effects on people who share Protected Characteristics.
- 3.6.6 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 Equalities team no instances have been identified where the content of policies

would give rise to adverse effects on people who share protected characteristics. The potential for impacts on protected characteristics are summarised below.

- 3.6.7 The legislative requirements relating to Marriage and Civil Partnership are only relevant in the context of the Borough Council's role as an employer and are not therefore relevant to the EqlA for the Draft Local Plan.
- 3.6.8 In terms of race - with the exception of the Gypsy and Traveller policy (H5) no policies in the Draft Local Plan are targeted towards or against this equality group.
- 3.6.9 Policies relating to inclusive design (SG1 and DH1) and achieving a range of accessible and adaptable housing (H2 and H4) will be relevant to age and disability. The provision of opportunities for employment and policies to secure opportunities for local people will also be relevant to these groups.
- 3.6.10 Policy CSF7 includes provision for places of worship and could therefore enable the provision of facilities for any religions/belief, where the criteria in the policy are met. The criteria relate to the need for the facility, capacity of existing facilities in the vicinity and criteria relating to access, amenity and scale of the proposal.
- 3.6.11 No policies in the Draft Local Plan are targeted towards or against the following groups:
- ▶ Religion/Belief
 - ▶ Gender reassignment
 - ▶ Sexual orientation
 - ▶ Pregnancy / maternity.
- 3.6.12 A suggestion arising from undertaking the Equality Analysis Quality Assurance Checklist is that the policy team considers consulting with or briefing other groups meeting during the consultation period on the Draft Local Plan, 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.
- 3.6.13 Based on the completed Equality Analysis Quality Assurance Checklist for the Draft Local Plan, a full EqlA is not necessary at this stage in the process as the Draft Local Plan does not appear to have any adverse effects on people who share Protected Characteristics. Rather steps will be taken to ensure due regard for the nine protected groups is embedded in the process to produce and the policies of the Local Plan as it continues to develop. The approach to this assessment has been discussed with the Council's Senior Strategy, Policy & Performance Officer (Equality) officer who confirmed that completion of the QA checklist was sufficient.

3.7 Key Findings from the HRA

- 3.7.1 The HRA considered potential effects on the following sites:
- ▶ Epping Forest Special Area of Conservation (SAC)
 - ▶ Richmond Park SAC
 - ▶ Wimbledon Common SAC
 - ▶ Lee Valley Special Protection Area (SPA)
 - ▶ Lee Valley Ramsar
- 3.7.2 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.

- 3.7.3 All of the sites are at least 3 km outside the LBTH area and so the 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 Local Plan could affect these 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 Local Plan could potentially affect European sites
- 3.7.4 The policies in the Draft 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.
- 3.7.5 The HRA 'screening' undertaken has reviewed the available data and the draft plan. The initial assessment conclusion is that the 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 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.
- 3.7.6 The HRA 'screening' undertaken has reviewed the available data and the draft plan. The initial assessment conclusion is that the 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 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.
- 3.7.7 However, Epping Forest SAC, Lee Valley SPA and Lee Valley Ramsar have features that are potentially sensitive to the outcomes of the 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 4.11 identifies policies that would benefit from amendments to maximise their effectiveness in reducing residual risk. In particular:
- ▶ Air Quality: it is recommended that Policy ES2 be used to help ensure that development arising from the LBTH plan plays a full part (with other plans) in reducing diffuse air pollution that may affect Epping Forest SAC. It is 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; the text within the existing local plan is likely to be appropriate, although 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).
 - ▶ Public Access: It is unlikely that visitor pressure on Epping Forest SAC will increase significantly as a result of the LBTH plan, such that the LBTH 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 could be placed on developers to clearly demonstrate how policies OS1 – OS4 are met, including consideration of the potential for any adverse effect on European sites as part of their proposals. The need for such an amendment to policy will be discussed with Natural England through consultation on this report.

3.8 Compliance with National Planning Policy Framework

3.8.1 The policies in the Draft Local Plan have been reviewed against the requirements of the NPPF (see **Appendix L** for details). The review found these to meet the requirements of the NPPF in respect of the topics to be covered by local plan policy. **Table 3.6** summarises the relationship between the policy group and the relevant NPPF paragraphs, which indicates that there is appropriate policy coverage. No policy gaps were identified. This conclusion is undertaken with the caveat that future iterations of the Draft Local Plan will need to demonstrate how housing and employment requirements to 2031 will be met in order for the Local Plan to be found sound but it is recognised that work on this is on-going.

Table 3.6: High level review against the NPPF

NPPF Paragraphs of relevance to LBTH	Local Plan Response
Presumption in Favour of Sustainable Development (6 – 17)	The chapter on Policy Context acknowledges the presumption in favour of sustainable development. Policy SG1 sets out proposals to secure sustainable growth.
Building a Strong and Competitive Economy (18 – 22)	Strategic Polices EMP1 and EMP2 Policy EMP3 – 5.
Ensuring the Vitality of Town Centres (23 – 27)	Strategic Policy TC1, Strategic Policy TC2, policies TC3 to TC5.
Promoting Sustainable Transport (29 – 41)	Strategic Policy TRN1 and Policies TRN2 to 5.
Supporting High Quality Communications Infrastructure (42 – 46)	Policy DH13
Delivering a Wide Choice of High Quality Housing (47 – 55)	Strategic Policy H1 and Policies H2 to H6.
Requiring Good Design (56 – 68)	Strategic Policies DH1 and DH2. Policies DH2 to DH13.
Promoting Healthy Communities (69 – 77)	Strategic Policies DH1, DH2, CSF1 and CSF2, Policies SG1, CSF3 to 9 and OS3.
Meeting the challenge of climate change, flooding and coastal change (93 -108)	Policies SG1, SG2 DH10, ES3, ES4 and ES5, ES6a, ES7 and ES8.
Conserving and Enhancing the Natural Environment (109 – 125)	Policies ES3 and OS4
Conserving and Enhancing the Historic Environment (126 – 141)	Policies DH.3, DH.4

3.9 Recommendations (including Mitigation)

- 3.9.1 Recommendations arising from the different elements of the IIA are set out in **Table 3.7**. This includes earlier recommendations made by the IIA on previous working drafts of the Local Plan. **Table 3.7** details where these earlier recommendations have been actioned and where they are outstanding. This reflects the iterative nature of the IIA, demonstrates the influence that the IIA has had on the development of the Local Plan to date and provides an audit trail of any recommendations outstanding. The remaining actions will be considered by the Council, along with consultation responses to the Draft Local Plan, to inform the next iteration of the plan.

Table 3.7: Summary of Recommendations

Policy Group	Policies	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded?
Spatial Strategy	N/A	As early as possible (we suggested in the Introduction) the amended draft Local Plan should acknowledge the role that the London Plan has in determining the scale and distribution of development in the Borough, both in terms of the number of homes and jobs to be provided and the role of the Opportunity Areas (City Fringe/Tech City, Lower Lea Valley and Isle of Dogs & South Poplar) in meeting this target.	Addressed - Chapter 2 Setting the Scene acknowledges the role of the London Plan at Page 17 with the Policy Context set out more fully from page 26.
		The overall contribution of allocations and non-allocated sites to meeting the requirements set out in the London Plan are not clear. It will be key in terms of the IIA being able to make conclusions on the overall effects of the Local Plan and understanding the distribution of development between the Opportunity Areas and Central Area.	Partly addressed Plan includes information on Strategic Sites to 2031 and also information on supply from other sources (17,700 dwellings).
		The Plan needs to demonstrate how it will meet needs to 2031. Include a statement in the consultation document confirming that the intention is to prepare a plan that identifies a dwelling requirement to 2031 and to demonstrate how the plan will meet that. This will be done once a longer term target for housing is agreed.	Clarification of previous recommendation but also an addition suggesting that the Consultation document makes it clear that the Council will work towards producing a Plan that meets needs to 2031 once agreement is reached on a revised annual housing target.
		The Local Plan notes that the London Plan will be amended again by 2017. Consistent with other Local Plans in London it would be prudent for the Local Plan to have a policy setting out a commitment to review the Local Plan once the London Plan is amended.	Recommendation withdrawn – following a review of the timescales for the Local Plan and London Plan it appears that the Local Plan could be in sync with revisions to the London Plan.
		The Local Plan could have a policy that sets out the Council's intention to support the production of NDPs.	Partly addressed – supporting text of the document (page 29) sets out support for the production of NDPs
		There is a need for some text that links the spatial strategy, with the general policies in the Local Plan as these will have an important role in shaping development in the Borough.	Addressed – Relevant text added at page 37 and 42 of the document.
		The Plan could also indicate which policies support the key objectives and detailed implementation considerations in order to identify that there are no gaps in policy.	New recommendation

Policy Group	Policies	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded?
		It is not clear if the intention of the Council is to promote the Central Area as a new Opportunity Area that should be recognised in the London Plan.	Still not clear but note that Figure 15 will be amended to clarify the status of the Central Area.
The Economy	Strategic Policy EMP1 and 2 and Policies EMP3 to 5	<ul style="list-style-type: none"> The Chapter on the Economy does not currently identify a target for new jobs/floorspace over the plan period – presumably the intention is to do that as it will be fundamental to demonstrating that the plan is sound and also assist the IIA. Nor does the chapter demonstrate the anticipated contribution that the Plan will make to employment growth. 	Partly addressed – the introductory text to the section includes a reference to the latest GLAs predictions for job growth in the period to 2031. The Plan is not really explicit in terms of how many jobs might be accommodated through new development or how much employment floorspace will be provided in the plan period.
		<ul style="list-style-type: none"> Policy EMP1 may be amended to require a site to be marketed for 24 months, rather than 12 months. We support the requirement for sites to be marketed (and the other criteria set out in the policy); however, 24 months may not be reasonable – is the Council aware of any recently adopted plans in London or elsewhere that have successfully required a 24 month marketing period? We note that this policy is subject to the outcome of the Employment Land Review. 	Policy EMP4 'Protecting Employment' retains reference to 24 months with no additional justification but we understand that other local authorities have also adopted 24 months, the justification could be expanded to make this point.
		<ul style="list-style-type: none"> Consider adding a justification for the presumption against live-work and work-live units set out in policy (relevant policy is now EMP3). 	Addressed – In the justification to Policy EMP3.
		<ul style="list-style-type: none"> Add a 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 SG1 references these principles. 	Addressed - SG1 references these principles.
Housing delivery	Strategic Policy H1 Delivering Housing and Policies H2 to H6.	<ul style="list-style-type: none"> Policy H5 safeguards the existing Gypsy and Traveller site at Old Willow Close. 	New recommendation - It is recommended that the site is identified on the Proposals Map once it is prepared.
Transport and connectivity	Strategic Policy TRN1	<ul style="list-style-type: none"> The intentions of Policy TRN.2 are supported however it is suggested that the authors consider whether or not the justification for the policy could provide advice on how future applications should demonstrate a public 	Addressed in the text on implementation to Policy TRN2 Policy TRN1 could reference the Cycling Plan for Tower Hamlets (2009)

Policy Group	Policies	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded?
	Sustainable Travel and TRN2 to TRN4 Sustainable Transport and Freight	transport accessibility is appropriate b) public transport can accommodate the development.	The justification for Policy TRN1 could reference the Walking Plan for Tower Hamlets (2011-2021).
Town centres	Policies Strategic Policies TC.1 and TC.2 and Policies TC3 to TC9	<ul style="list-style-type: none"> Consider adding a reference to the Greater London Authority's (GLAs) SPG on Town Centres in the introductory text. 	Not addressed – details of SPG provided
		<ul style="list-style-type: none"> Consider amending Policy TC.0 (d) to include a list of District Centres. 	Addressed in Policy TC1
		<ul style="list-style-type: none"> Consider adding justification at Policy TC.2 (3) for solid shutters not being permitted, e.g. to make the area more welcoming in the evening. 	Not addressed, relevant policy is now DH11
		<ul style="list-style-type: none"> Policy TC.4 could cross-reference the Council's Statement of Licensing Policy. 	Not addressed, relevant policy is now TC6
		<ul style="list-style-type: none"> Consider whether the policy relating to the night-time economy (TC.4) could draw more from the GLA's SPG on Town Centres (pages 23 to 24). 	Not addressed, relevant policy is now TC6
Open space	Strategic Policy OS1 and OS2 and Policy OS3 and OS4.	<ul style="list-style-type: none"> 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. It is noted that a reference to the All London Green Grid has been added to the supporting text. HRA Screening identifies the potential need for projects to provide additional information in relation to provision of recreational space. 	<p>Addressed – Strategic Policy OS1 references the all London Green Grid.</p> <p>Relevance of recreational pressure and European sites to be discussed with Natural England.</p>
Design and historic environment	Strategic Policies DH1 and DH2 and Policies DH3 to DH11	<ul style="list-style-type: none"> Consider whether or not Policy D5 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. 	Partly addressed in relation to the demolition of heritage assets.
		<ul style="list-style-type: none"> Consider splitting Policy D5 into two parts, one dealing with proposals affecting designated assets and one dealing with non-designated assets because the NPPF advocates different approaches to them. 	Not addressed, relevant policy is now DH3.

Policy Group	Policies	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded?
		<ul style="list-style-type: none"> Consider whether or not the same comments apply to Policy D6: World Heritage Sites, for example the language used in relation to assessing harm on their setting and the extent to which this is consistent with the NPPF. 	Not addressed, relevant policy is now DH4.
		<ul style="list-style-type: none"> Consider a reference to 'designing out crime' principles in this section. 	Partly addressed, Policy DH5 Streets and public realm discusses the role of design in the context of pedestrians. The principle extends wider to other people, e.g. residents and could be included in SG1.
Community facilities	Policies Strategic Policy CSF1 and CSF2 and Policies CSF3 to CSF9	<ul style="list-style-type: none"> Consider an explicit reference to the provision of community facilities through shared spaces, e.g. in Policy C1. 	Partially addressed - Encouraging shared facilities is referenced in Key Objective 1 under implementation but this might have greater weight if then carried through to a policy, e.g. CSF1.
Urban greening and biodiversity	Policy ES3	<ul style="list-style-type: none"> Consider whether or not the Plan could be more explicit in terms of a) the areas that might be affected by the Heat Island effect and b) the timescale over which the potential for this issue should be considered. 	Partially addressed – the justification for Policy ES3 identifies types of areas that can experience the Heat Island effect – the recommendation was suggesting that specific locations in the Borough that may be more susceptible to it are identified (if there are any).
		<ul style="list-style-type: none"> Policy ES2 seeks to protect Sites of Importance for Nature Conservation but may not be fully compliant with the NPPF as it misses the opportunity to seek mitigation or compensation (paragraph 118 of the NPPF refers). 	Addressed in Policy ES3.
The Environment	Policy ES2 Policy ES4 Policy ES5,	<ul style="list-style-type: none"> Policy ES4 is supported but needs to be justified, i.e. the supporting text should acknowledge that the Borough is in an area of water stress. 	Addressed in the justification for Policy ES4 New recommendation – Policy ES2 on improving air quality could highlight the need for proposals that would give rise to diffuse air pollution to consider the potential for effects on European sites.
		<ul style="list-style-type: none"> Previous recommendation relating to reference to voluntary schemes like the Housing Quality Mark be incorporated elsewhere in the draft Plan. 	Addressed in Policy DH1
Developer Contributions	Policy DC1	<ul style="list-style-type: none"> Previous observation – did the Local Plan provided the necessary 'policy hook' for the Planning Obligations SPD. 	Addressed - Policy DC1 provides the hook for the SPD.
Managing change	Previously suggested new policy	<ul style="list-style-type: none"> Previous suggestion for a new policy that highlights the need to manage potential effects associated with the delivery of new development, including 	Addressed in SG2.

Policy Group	Policies	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded?
		measures to ensure that effective community engagement takes place and that the construction phase is managed has been incorporated in CC1.	
Site capacity	N/A	<ul style="list-style-type: none"> For the purposes of undertaking the IIA (and demonstrating soundness) it would be helpful if the schedule included the anticipated capacity of each site and the proportion anticipated to be developed within the plan period. 	Not addressed the supplement to Section 5 includes details for each site but does not specify the amount of housing or employment that could be provided on each site.
Justification for site selection		<ul style="list-style-type: none"> LBTH to confirm if there are any potential strategic sites that have not been included and a justification for their exclusion, together with a justification for the inclusion of the sites selected. It is noted that many sites are carried forward from the Core Strategy and Managing Development Document. 	LBTH to confirm if there were any sites that were considered as strategic sites but not taken forward.
Consultation	Page 5 of document	<ul style="list-style-type: none"> Arrangements for consultation are provided on pages 5 and 6 of the document. 	New recommendation - Is there scope to consult or brief other groups meeting during the consultation period, e.g. groups identified in the Council's Single Equality Framework, e.g. Community Forums and Local Voices

4. Conclusions and Next Steps

4.1 Introduction

- 4.1.1 This section briefly summarises the key conclusions from the report and sets out the next steps, including details of how to comment on this report.

4.2 Key Conclusions Emerging from the Appraisal and Plan Making Process

- 4.2.1 The Draft Local Plan is at an early but important stage in its development. The Council is in the process of reviewing the evidence base, enabling it to plan for growth in the period up to 2031.
- 4.2.2 The Draft Local Plan that is being consulted on sets out intention for strategic planning for the Borough to be more closely aligned with the London Plan by placing greater emphasis on the Opportunity Areas within the Borough identified in the London Plan. At the same time a vision, two key objectives, implementing considerations and a set of policies to control development in the Borough are put forward for consultation. A number of strategic sites are also put forward for consultation, the scale of these sites and associated timescales for their development means that many are carried forward from previous policy documents.

Sustainability Appraisal

- 4.2.3 The SA has identified the potential for the vision, key objectives and policies to make to a range of economic, social and environmental factors. No significant policy gaps were identified. A key recommendation relating to both policies and sites is for later versions of the Local Plan to be clearer about the contribution that new development could make to employment provision, including the role of the Strategic Sites.
- 4.2.4 More detailed suggestions for changes to policy relate to the structure of the policies on heritage D5 and D6 and the extent to which they reflect 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.
- 4.2.5 Twenty eight strategic sites have been included as proposed allocations within the Draft Local Plan. Many are major sites identified in the Managing Development Document (April 2013). Two strategic sites are already under construction and therefore have not been appraised.
- 4.2.6 The strategic sites have been appraised using tailored appraisal criteria and associated thresholds of significance. The site appraisal criteria and matrices which report the outcome of this assessment for each strategic site are presented at **Appendix K**. The findings of this appraisal are presented in **Table 3.4** it indicates that the majority of the strategic sites would either have positive or neutral effects on the majority of the SA objectives, with the notable exceptions of SA objectives 10 'Cultural Heritage', 13 'Biodiversity' and 15 'Flood Risk'. The appraisal scores for sites are pre-mitigation, recognising that there is **potential** for a significant effect. Whether or not an effect will happen will, in some cases be dependent on how a site is designed and the mix of uses agreed. The majority of the strategic sites give rise to potential negative effects on these objectives owing to their geographical situation relative to heritage assets, designated sites and flood risk areas respectively.. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan. There are uncertainties around the contribution that sites could make to employment provision at this stage, the Draft Local Plan seeks to protect and re-provide employment space where relevant but the contribution of Strategic sites to the provision of new employment floorspace is uncertain at this time.

Health Impact Assessment

- 4.2.7 The HIA used the HUDU Rapid HIA Assessment Matrix to analyse the impact of the Local Plan and the results are summarised in Section 3.2 and **Appendix G**. The results suggest that policies will help to secure development that will contribute to a range of positive effects. These relate to factors like housing, transport and mobility, access to healthy food; access to work and training; minimising the use of resources; and climate change. A recommendation arising from the HIA is that the Local Plan could reference designing out crime principles more generally, e.g. Secured by Design (Association of Chief Police officers. Secured by Design, New Homes 2010).

Equalities Impact Assessment

- 4.2.8 The Local Plan is a Borough wide document that will potentially impact on all of those who live, work and visit the Borough. There are policies in the Draft Local Plan which, while not focussed on people who share Protected Characteristics, could have significant positive effects. These include policies relating to housing, employment, transport and mobility and inclusive design. The provision of adaptable and accessible housing will bring positive outcomes for the disabled and others. The safeguarding and provision of accommodation for Gypsies and Travellers are also positive. Based on the Equality Analysis Quality Assurance Checklist a Full EqIA is not necessary at this stage in the process as the Draft Local Plan does not appear to have any adverse effects on people who share Protected Characteristics. Rather steps will be taken to ensure due regard for the nine protected groups is embedded in the process to produce and the policies of the Local Plan as it continues to develop.
- 4.2.9 A suggestion arising from undertaking the Equality Analysis Quality Assurance Checklist is that the policy team considers consulting with or briefing other groups meeting during the consultation period on the Draft Local Plan, 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.

Habitats Regulations Assessment

- 4.2.10 The HRA 'screening' undertaken has reviewed the available data and the draft plan and the results are presented in **Appendix I**. The initial assessment conclusion is that the 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 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.
- 4.2.11 Epping Forest SAC, Lee Valley SPA and Lee Valley Ramsar have features that are potentially sensitive to the outcomes of the 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 and suggested amendments to policies/supporting text may be required but this will be explored with Natural England through consultation on the Draft Local Plan and this report.

Compliance with the NPPF

- 4.2.12 The policies in the Draft Local Plan have been reviewed against the requirements of the NPPF (see **Appendix L** for details). The review found these to meet the requirements of the NPPF in respect of the topics to be covered by local plan policy.

Recommendations

- 4.2.13 A set of recommendations have been provided and are set out in **Table 3.7**. A number of recommendations made earlier in the process have been incorporated in the Draft Local Plan.

4.3 Monitoring

4.3.1 It is a requirement of the SEA Directive and associated Regulations to establish how the significant sustainability effects of implementing the Local Plan will be monitored. However, as earlier government guidance on SEA (ODPM et al, 2005) notes, it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects, including unforeseen adverse effects. Monitoring the Local Plan for sustainability effects can help to answer questions such as:

- ▶ Were the predictions of sustainability effects accurate?
- ▶ Is the Local Plan contributing to the achievement of desired SA objectives?
- ▶ Are mitigation measures performing as well as expected?
- ▶ Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

4.3.2 Monitoring should be focussed on:

- ▶ Significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- ▶ Significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken.
- ▶ Where there is the potential for effects to occur on sensitive environmental receptors.

4.3.3 At this early stage in the development of the Local Plan and SA it is considered premature to identify proposed monitoring indicators as the plan is still under development. The Scoping report did give consideration to potential sources of indicators associated with the baseline and this is attached as **Appendix D**. It will be important that any monitoring regime associated with the SA is embedded within monitoring associated with the Local Plan and other Council workstreams, so as to avoid duplication of effort.

4.4 Next Steps

4.4.1 This IIA Report is being issued for consultation alongside the Draft Local Plan. The consultation will run from Friday 11th November 2016 to midnight on Monday 2nd January 2017.

4.4.2 The findings of the IIA Report, together with consultation responses and further evidence base work, will be used to help refine the Local Plan.

4.4.3 There is a programme of engagement in November – December on the consultation document. There will be further rounds of formal consultation as the Local Plan develops, anticipated to be undertaken in Spring/Summer 2017. A further iteration of this IIA report will then be published, including a review of comments on this report and responses to those.

4.5 How to Comment on this Report

4.5.1 This IIA Report has been issued for consultation alongside the Draft Local Plan from **Friday 11th November to midnight Monday 2nd January 2017**. Details of how to respond to the consultation are provided below.

This Consultation: How to Give Us Your Views

We would welcome your views on any aspect of this IIA Report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.

Please provide your comments by **midnight on Monday 2nd January 2017**. Comments should be sent to:

By email: TBC

By post:

FREEPOST

Local Plan Consultation

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4.6 Quality Assurance

- 4.6.1 This SA Report has been prepared in accordance with the requirements of the SEA Directive and associated Regulations, although at this early stage in the development of the Local Plan and SA thereof it is too premature for all of these requirements to be met (in particular, those requirements relating to the assessment of cumulative effects and monitoring). A Quality Assurance Checklist is presented at **Appendix B**.



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