

Cabinet



Wednesday, 16 December 2020 at 5.30 p.m.

Online 'Virtual' Meeting - <https://towerhamlets.public-i.tv/core/portal/home>

Supplemental Agenda 1

Replacement report and Appendix 4 for Item 6.2 - Adoption of High Density Living SPD



Public Information

Viewing or Participating in Cabinet Meetings

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A Guide to CABINET

Decision Making at Tower Hamlets

As Tower Hamlets operates the Directly Elected Mayor system, **Mayor John Biggs** holds Executive powers and takes decisions at Cabinet or through Individual Mayoral Decisions. The Mayor has appointed nine Councillors to advise and support him and they, with him, form the Cabinet. Their details are set out on the front of the agenda.

Which decisions are taken by Cabinet?

Executive decisions are all decisions that aren't specifically reserved for other bodies (such as Development or Licensing Committees). In particular, Executive Key Decisions are taken by the Mayor either at Cabinet or as Individual Mayoral Decisions.

The constitution describes Key Decisions as an executive decision which is likely

- a) to result in the local authority incurring expenditure which is, or the making of savings which are, above £1million; or
- b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the borough.

Upcoming Key Decisions are published on the website on the 'Forthcoming Decisions' page through www.towerhamlets.gov.uk/committee

Published Decisions and Call-Ins

Once the meeting decisions have been published, any 5 Councillors may submit a Call-In to the Service Head, Democratic Services requesting that a decision be reviewed. This halts the decision until it has been reconsidered.

- The decisions will be published on: **Thursday, 17 December 2020**
- The deadline for call-ins is: **Thursday, 24 December 2020**

Any Call-Ins will be considered at the next meeting of the Overview and Scrutiny Committee. The Committee can reject the call-in or they can agree it and refer the decision back to the Mayor, with their recommendations, for his final consideration.

Public Engagement at Cabinet

The main focus of Cabinet is as a decision-making body. However there is an opportunity for the public to contribute through making submissions that specifically relate to the reports set out on the agenda.


Members of the public may make written submissions in any form (for example; Petitions, letters, written questions) to the Clerk to Cabinet (details on the previous page) by 5 pm the day before the meeting.

Cabinet

Wednesday, 16 December 2020

5.30 p.m.

6 .2	Adoption of the High Density Living Supplementary Planning Document	Pages
	<p>Report Summary: The High Density Living SPD provides supplementary guidance on the design of high density residential and mixed use development as set out in the new Local Plan to 2031 (adopted January 2020), in particular policy S.DH1- Delivering High Quality Design and policy D.DH7 - Density. Furthermore, the SPD seeks to help to deliver the Mayor’s manifesto pledges to improve the quality and fairness of housing and make development work for local people. The High Density Living SPD has been through an extensive preparation process that includes project scoping (April 2018-July 2018); evidence gathering -including a large resident survey, workshops and interviews with residents, Council services and other stakeholders- (from August 2018-January 2019); preparation of draft document (February 2019-July 2019); option testing (September-December 2019) and public consultation (February 2020-June 2020). A wide range of community groups, residents, developers and other stakeholders made formal responses to the High Density Living SPD as part of the consultation process. It is now necessary to adopt the High Density Living SPD to further enable clear and robust guidance to inform and be implemented in development proposals which will ensure the quality of life of residents in high-density developments is delivered and in accordance with corporate and Council objectives and the development Plan (Local Plan and London Plan).</p>	5 - 98
	<p>Wards: All Wards Lead Member: Cabinet Member for Planning and Social Inclusion (Job Share) - Lead on Planning Corporate Priority: TH Plan 3: Strong, resilient and safe communities</p>	

<p>REVISED Cabinet Report</p> <p>16th December 2020</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Ann Sutcliffe, Place Corporate Director</p>	<p>Classification: Unrestricted</p>
<p>Adoption of the High Density Living Supplementary Planning Document</p>	

Lead Member	Councillor Eve McQuillan, Cabinet Member for Planning and Social Inclusion
Originating Officer(s)	Lucia Cerrada Morato
Wards affected	All wards
Key Decision?	Yes/No
Forward Plan Notice Published	17 th November
Reason for Key Decision	Impact on Wards
Strategic Plan Priority / Outcome	A borough that our residents are proud of and love to live in

Executive Summary

The High Density Living SPD provides supplementary guidance on the design of high density residential and mixed use development as set out in the new Local Plan to 2031 (adopted January 2020), in particular policy *S.DH1- Delivering High Quality Design* and policy *D.DH7 - Density*. Furthermore, the SPD seeks to help to deliver the Mayor’s manifesto pledges to improve the quality and fairness of housing and make development work for local people.

The High Density Living SPD has been through an extensive preparation process that includes project scoping (April 2018-July 2018); evidence gathering -including a large resident survey, workshops and interviews with residents, Council services and other stakeholders- (from August 2018-January 2019); preparation of draft document (February 2019-July 2019); option testing (September-December 2019) and public consultation (February 2020-June 2020). A wide range of community groups, residents, developers and other stakeholders made formal responses to the High Density Living SPD as part of the consultation process.

It is now necessary to adopt the High Density Living SPD to further enable clear and robust guidance to inform and be implemented in development proposals which will ensure the quality of life of residents in high-density developments is delivered and

in accordance with corporate and Council objectives and the development Plan (Local Plan and London Plan).

Recommendations:

Cabinet is recommended to:

1. To approve the High Density Living SPD (appendix 1) for adoption and authorise officers to prepare an adoption statement and publish the Regulation 18(4)(b) Statement and adoption statement so it can be considered a material planning consideration in the assessment of planning applications for high density and high-rise buildings.
2. Authorise the Corporate Director of Place to make any necessary factual or minor editing changes prior to publishing the final High Density Living SPD.
3. To note the Equalities Impact Assessment as set out in appendix 2.
4. To note the Representation schedule summarising representations received during the consultation and the responses to these representations as set out in appendix 3.
5. To note the Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report and consultation responses attached in appendix 4.

1 REASONS FOR THE DECISIONS

- 1.1 Tower Hamlets has the highest housing target under in the current London Plan and this has been only moderately reduced in the new draft London Plan. With limited land available for new development, significant emphasis has been placed on optimising housing density to deliver sufficient new homes. Increasingly, planning policy and guidance has supported the delivery of housing at high densities. This narrative has continued in the draft London Plan, which unlike its predecessor does not set out target density ranges, and instead leaves upper density levels open, allowing boroughs to determine the appropriate development in the context of their existing character and densities.
- 1.2 The new Tower Hamlets Local Plan sets out how the borough will grow and develop from now until 2031. It recognises that during this time Tower Hamlets will continue to be home to diverse communities and that it is important to support existing residents and welcome new people to make

their home within liveable, mixed, stable, inclusive and cohesive neighbourhoods, which contribute to a high quality of life. Among the many policies that will shape new development is one that seeks to manage the impacts of high density developments. This supports the Mayor of Tower Hamlets' manifesto commitment to continue to oppose development that is too tall or too dense.

1.3 The density of development has two important implications; it influences the number of people living in an area and it influences the nature of the urban form in which they are accommodated. Tower Hamlets has a rapidly growing population, with up to 400,000 new residents expected by 2031. However the land available for new development is decreasing. The borough has already undergone significant development in recent years limiting the number of sites that are available for redevelopment and intensification. This growth inevitably will result in an increase in residential densities that will focus in particular areas of the borough, such as the City Fringe, parts of the Isle of Dogs and Poplar Riverside. Increased densities will also mean that this growing population will be accommodated in a changing landscape of built form, particularly one that features an increased number of tall buildings. The Local Plan seeks to manage some of the implications of these changes, however given the cumulative number of high density developments it was agreed that a more detailed knowledge of the experiences of those who live in high density developments was necessary in order to understand how we can ensure new development provides a good and sustainable quality of life.

1.4 Evidence gathered through surveys and interviews pointed to important design issues that impact residents' quality of life. The High Density Living Supplementary Planning Document provides a series of design recommendations to support residents' quality of life.

2 ALTERNATIVE OPTIONS

2.1 The new Local Plan provides a vision and strategic development principles for residential and tall buildings (among other policy themes and spatial guidance). An alternative option would be to rely on this document to support and guide the development and assessment of high density and high-rise buildings in the Borough, without further detailed design guidelines.

2.2 This option was considered inadequate as it would not provide a sufficiently detailed understanding of the implications of high density and high-rise developments on resident's quality of life. Without the additional design guidelines provided by the SPD, the Local Plan does not provide in itself the

necessary level of detail to secure exceptional architectural quality and innovative and sustainable building design.

3 DETAILS OF THE REPORT

Background

- 3.1 The Strategic Planning service has prepared a Supplementary Planning Document (SPD) that provides additional guidance on the design of high density residential and mixed use development. The SPD supports the new Local Plan to 2031, in particular policy S.DH1 - Delivering high quality design and policy D.DH7 - Density. The project helps to deliver the Mayor's manifesto pledges to improve the quality and fairness of housing and make development work for local people. This responds to the National Planning Policy Framework (NPPF) and new London Plan, and has been prepared and will be adopted in accordance with the provisions in the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.2 The project responds to important recent changes in national and regional policy. Firstly, the significant emphasis that the new London Plan places on optimising housing density to deliver sufficient new homes and that, unlike its predecessor, the new London Plan does not set out target density ranges, and instead leaves upper density levels open, allowing boroughs to determine the appropriate development in the context of their existing character and densities. Secondly, the new NPPF and new London Plan place great emphasis on design quality to achieve high quality buildings and places. The NPPF encourages plans and supplementary guidance to provide maximum clarity about design expectations at an early stage through visual tools such as design guidelines. The high density living guidance seeks to provide a clear design vision and set expectations for future development in the borough.
- 3.3 The project's main objective is to ensure that the design of new high density development contributes toward a high-quality of life. It will also enable stakeholders, such as residents, Members, developers and officers, to better understand the role of design in high density residential and mixed-use development.

SPD process

Project scoping and evidence gathering

- 3.4 As part of this work, and in order to inform and provide a robust basis for drafting the supplementary policy, extensive research has been carried out into the design of high density residential development, with a particular focus

on tall buildings as this type is particularly prevalent in the borough. Project scoping and evidence gathering took part between April 2018 and October 2018. This research and evidence gathering builds on work that has already been done, for example the new Local Plan, to respond to significant increases in the density and height of residential and mixed-use planning applications that have come forward in the borough in recent years. As part of the research and evidence base gathering, we;

- 3.5 First, undertook desk-based research in relation to existing policy and relevant evidence to understand and assess potential gaps.
- 3.6 Second, to gather primary data and inform the guidance, evidence was collected through a series of case studies. Case studies were selected across a range of residential densities and a range of building heights, as well as different tenure splits. The case studies were selected from different parts of the borough, and with a range of different building typologies.
- 3.7 Third, to understand the implications of living at high density, a framework against which high density living environments can be assessed was established. This was based on a set of quality of life indicators that were identified by carrying out a review of relevant literature and best practice.
- 3.8 Fourth, using the initial quality of life indicators, research was carried out to ascertain the ways in which the design characteristics of high density living environments impacted on the quality of life of residents across the nine case studies. The data was gathered through a desktop study, a resident survey, resident interviews, site visits, a neighbourhood survey and a desktop study.

In total 732 residents participated in the resident survey. The survey was then followed up with semi-structured interviews with fifty of the respondents to gain a deeper understanding of life in high density living environments. Site visits to the case study schemes, led by the building caretakers, were carried out and detailed observations were recorded. A second survey focused on residents living around the nine case studies, to understand the impact of high density buildings on neighbouring communities. A detailed examination of the planning application drawings and documents for the case study schemes was also carried out. This highlighted that there are a number of challenges on designing high density buildings such as overcoming social isolation, providing good quality play spaces, avoiding overheating in flats, etc.

- 3.9 This research and evidence gathering allowed for a draft or scoping document to be drafted in preparation for engagement and formal consultation.

Further engagement

- 3.10 The project has been informed by extensive engagement, November 2018 until January 2019, with a range of internal and external stakeholders such as ward Members, key public sector agencies, landowners and relevant Council departments. This is an important part of the preparation process, to ensure key issues are identified and resolved at the earliest opportunity. The principal methods of engagement were workshops, interviews, focus groups and sounding board sessions.
- 3.11 Internal stakeholders included a range of council services, such as those with a responsibility for safety, public health, housing and sustainability, public realm, transport and waste, and leisure. External stakeholders such as residents, experts, academics, housing associations, developers, architects and neighbouring local authorities, were also engaged with.
- 3.12 The project was also selected to participate in the GLA's first Social Integration Lab, which gave officers the opportunity to work with social integration experts, public sector innovators and residents to embed social integration principles into the guidance recommendations.

Drafting of document and option testing

- 3.13 The research and engagement outlined above informed the first draft of the design guidance. The drafting process spanned from February 2019 until July 2019.
- 3.14 Through a variety of engagement methods such as briefings, workshops, co-design workshops and various presentations, feedback was sought on options for guidance and recommendations. Some of the stakeholders engaged were Housing Associations, Developers, Services across the Council and built environment experts. Option testing took place between July 2019 and December 2019.
- 3.15 The document was informed by the option testing discussions and finalized between December 2019 and February 2020.

Formal Consultation

- 3.16 Consultation was undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI), the Corporate Handbook and in collaboration with the Communications Team. The public consultation on the draft was designed to test the content of the SPD and also to highlight the lived experiences of residents in high density buildings and high density neighbourhoods. A summary of the consultation methods are:

- Advertisement in the East End Life newspaper
 - Information on the Council's website
 - Series of events and exhibitions between March and April 2020. The events and exhibitions were designed to be accessible and open to everybody and tailored to address a range of audiences.
 - Providing a telephone hotline and email address for queries on the SPD.
- 3.17 The consultation events were planned to take place in three areas; East (Aldgate), West (Bow) and South (Isle of Dogs). These are areas that currently feature high density development and that are expected to see further high density growth in the future. The case studies that informed that guidance are also based in these three areas.
- 3.18 The exhibitions displayed material, including photographs and videos, gathered through interviews and conversations with residents to show the lived experiences in high density environments. These were presented alongside exhibition panels illustrating the content of the SPD. The exhibitions and events were planned to move across the three areas during the consultation period, with two weeks at each area.
- 3.19 Unfortunately due to the Covid-19 pandemic and given the clear government guidance to stay at home and avoid all unnecessary travel all in-person consultation events had to be cancelled after the events in the Aldgate area.
- 3.20 In order to respond to the context and adapt the public consultation the Council undertook the following measures:
- The Consultation was extended by four weeks until the 15th of May
 - All exhibition material was uploaded to the website (including videos and panels)
 - Council invited questions from the public
 - All the measures above were widely publicised through social media (including Facebook, Twitter and LinkedIn) and emails were circulated to the Strategic Planning contact list
 - Extension to the Consultation and other measures were also presented at the Developers Forum
- 3.21 Over 50 people attended the consultation events held by the Council. In addition, 62 written representations were received via email and/or online survey from Members, local residents, statutory consultees, (including, Greater London Authority (GLA), London Thames Gateway Development Corporation (LTGDC), Transport for London (TfL), Environment Agency and English Heritage) landowners and developers.

3.22 The Council has collated the individual comments made on the draft High Density Living SPD and formulated responses to themes (see next section) that have been used to inform the finalisation of the High Density Living SPD. In accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a statement setting out a summary of all of the representations received and the Council's proposed response to them has been appended to this Report, together with the final SPD, for approval.

Overview of Consultation Feedback

3.23 The overarching objectives for the High Density Living SPD to guide the development of good quality high density and high-rise buildings were generally supported by the community and key stakeholders. There was particular support for:

- Child friendly guidelines that seek to provide independent mobility and independent play for children
- Community cohesion policies through how communal amenity spaces are connected and located within the development and in relation to the wider neighbourhood
- Guidelines on how to achieve adaptable homes through careful consideration of flat layouts and storage

3.24 Representations expressed concerns on:

- The document being too lengthy
- Some of the guidelines going beyond the scope of planning
- The lack of clarity on what type of buildings the document applies to
- The lack of clarity on how the document will be used to assess applications
- The cumulative impact on economic viability

3.25 The document has been amended to respond to the representations above. Specifically:

- The document has been streamlined from 132 to 98 guidelines. Guidelines were combined when addressing recommendations for the same space. In doing so hierarchy and clarity on how applicants can achieve good design has been provided. When guidelines repeat or refer to existing guidelines, clear reference has been made. These have been kept in order to provide an holistic view of the policy framework.

- Clarity provided on which guidelines are expected to be met at planning stage and which ones constitute only recommendations after planning consent.
- Introduction amended to clarify to what buildings this document applies. Clearer definition provided of high density and high rise in the context of Tower Hamlets as well as further guidelines on how to calculate density is now provided in the introduction. The introduction also clarifies that this document only applies to residential C3 uses.
- Introduction amended to clarify how the document will be used by different stakeholders. This includes how applicants are to demonstrate their consideration of the SPD in developing their proposal and how officers will use the document throughout the planning application process.
- Clarification on expectations about the compliance of guidelines, such that the applicants are not expected to meet all guidelines but need to prove how they achieve the main objectives of the SPD in supporting residents quality of life. This minimises concerns about cumulative impact on economic viability.

Next Steps

- 3.26 To make any necessary factual or minor editing changes prior to publishing the final High Density Living SPD.
- 3.27 To prepare an Adoption Statement to accompany the High Density Living SPD in accordance with Regulation 11 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Adoption Statement sets out:
- a. date which the High Density Living was adopted; and
 - b. notice that any person with sufficient interest in the decision to adopt the supplementary planning document may apply to the High Court for permission to apply for judicial review of that decision, and
 - c. that any such application must be made promptly and in any event not later than 3 months after the date on which the supplementary planning document was adopted; and.

- 3.28 Subject to Cabinet adopting the High Density Living SPD, both the SPD and an adoption statement, will be finalised and published on the Council's web site and made available in the borough's Idea Stores, libraries and planning reception at the Town Hall. The High Density Living SPD will become a material consideration in the assessment of high density developments.
- 3.29 Under Regulation 11 of The Town and Country Planning (Local Planning) (England) Regulation 2012 section, an application can be made within three months of adoption to the High Court to have a judicial review of that decision. However, we can still put full weight on the policies in the plan during the challenge period. Therefore, following adoption of the High Density Living SPD there will be a statutory three months legal challenge period. The three months will commence from the date of adoption which will be the date of the Cabinet meeting. In the event of such a challenge, a further report will be presented to Cabinet to provide a suitable update on the expected process and associated risks.

4 EQUALITIES IMPLICATIONS

- 4.1 We have completed the Equalities checklist attached as appendix 2.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
 - Consultations,
 - Environmental (including air quality),
 - Risk Management,
 - Crime Reduction,
 - Safeguarding.
 - Data Protection / Privacy Impact Assessment.

- 5.2 No other statutory implications.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 There are no direct financial implications emanating from this report which provides guidance to developers when designing high density development proposals.
- 6.2 The cost of producing the high density living supplementary plan was met from existing budgetary provision and GLA funding.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The Executive (Mayor and Cabinet as defined in section 9(c) of *the Local Government Act 2000*) is authorised to consider the proposed recommendations in this report by virtue of the SPD comprising a 'Key Decision' as defined in Section 3 of the Council's Constitution. Paragraph 6 of Section 3 of the Constitution defines 'Key Decision' as an executive decision which is likely to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions. As stated above in this report, this SPD if implemented will have a significant effect on all wards in the borough as it will comprise a material planning consideration in the assessment of new planning applications for high density and high rise buildings.
- 7.2 The SPD itself is a document defined in regulation 5 of the Town and Country (Local Planning) (England) Regulations 2012 ('the Regulations') to encompass any document prepared by a local planning authority which contains statements (insofar as they relate to this SPD) regarding:
- 7.1.2 the development and use of land which the local planning authority wish to encourage during any specified period; and
 - 7.2.2 any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land.
- 7.3 The SPD comprises a category of planning documents, which only supplement the policies in a local plan. Unlike local plans, SPDs are not required to be submitted to independent examination. 2
- 7.4 The SPD has been prepared in accordance with the procedures set out in the Regulations.
- 7.5 Pursuant to s149 of the Equality Act 2010, the Council is under a duty to have due regard to think about the need to:
- 7.5.1 Eliminate unlawful discrimination;
 - 7.5.2 Advance equality of opportunity between people who share a protected characteristic and those who don't;
 - 7.5.3 Foster or encourage good relations between people who share a protected characteristic and those who don't.
- 7.6 The completed Equalities checklist at Appendix 2 of this report demonstrates the Council's compliance with its public sector equality duty under the Equality Act 2010.

Linked Reports, Appendices and Background Documents

Linked Report

- None.

Appendices

Appendix 1 – High Density Living SPD•

Appendix 2 – Quality Assurance Checklist•

Appendix 3 – Consultation and Engagement.

Appendix 4 (NEW) - Strategic Environmental Assessment and Habitats
Regulation Assessment Screening Report

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- NONE

Officer contact details for documents:

Or state N/A

Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report

High Density Living Supplementary Planning Document

Statement of Reasons

December 2020

Contents

1. Introduction
2. High Density Living Supplementary Planning Document
3. Legislative and Policy Context
4. Screening Exercise
5. Assessment of Likely Significant Effects
6. Habitats Regulation Assessment Screening
7. Conclusion
8. Consultation

1. Introduction

- 1.1. This screening exercise outlines the Council's consideration of whether the proposed High Density Living Supplementary Planning Document (SPD) (Regulation 14 consultation version, dated July 2020) should be subject to a Strategic Environmental Assessment (SEA) or Habitats Regulation Assessment (HRA).

- 1.2. This document constitutes the Council's Statement of Reasons for whether the High Density Living SPD requires a Strategic Environmental Assessment, as set out under Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. It is accompanied by a Determination Letter.

2. High Density Living Supplementary Planning Document

- 2.1 The High Density Living SPD sets out detailed guidance on the implementation of policies in the Tower Hamlets Local Plan 2031. It seeks to support the plan to ensure that new homes and neighbourhoods are designed to provide a high quality of life for existing and future residents in the borough's high density environments.
- 2.2 The SPD does not apply to a specific area in the Borough but will be applied across Tower Hamlets. As indicated in page x of the SPD, the document is relevant to residential and mixed use development that exceeds 1,100 habitable rooms per hectare or includes a tall building.
- 2.3 The high density living guidance seeks to provide a clear design vision and set expectations for future high density development in the borough. The guidance does not seek to focus just on how these buildings look but how these new forms of development can help to ensure that existing and future residents and people working in the building can enjoy a high quality of life. It supports the vision, objective and policies of the Tower Hamlets Local Plan 2031, supporting priority 1 - People are aspirational, independent and have equal access to opportunities -and 2 - A borough that our residents are proud of and love to live in- of the Mayor's Strategic Plan.
- 2.4 In particular, the SPD provides detailed guidance to help the council deliver its vision to support existing communities and welcome new residents to make their home within liveable, mixed, stable, inclusive and cohesive neighbourhoods, which contribute to a high quality of life and more healthy lifestyles. To achieve this, the guidance sets out how new development can share the benefits of growth in Tower Hamlets by contributing to the creation of healthy environments, encouraging physical activity, promoting good mental and physical wellbeing and reducing environmental impacts. It also demonstrates how the benefits of growth can be shared by creating mixed and balanced communities, delivering tenure-blind development and increasing opportunities for social interaction.
- 2.5 Accompanying the vision there are five topics papers which summarise the data gathered through the evidence gathering stage. These constitute the

main challenges and opportunities which manifest in high density developments. Topic papers also outline overarching objectives for each of these issues.

2.5.1 Children and young people. Objectives:

- Provide sufficient and varied space for children and young people to play and socialise.
- Make it easy for children to move around the building and use play spaces independently
- Integrate play space with other spaces and amenities to encourage use
- Allow play or gathering in most parts of the building -not just designated spaces
- Support play provision with facilities for adults

2.5.2 Sense of community. Objectives:

- Provide opportunities for residents to meet and interact with residents in the neighbourhood
- Provide opportunities for residents of different tenures and blocks to cross paths regularly
- Increase sense of safety, sense of belonging, familiarity and care
- Increase opportunities for residents to share space on a regular Basis

2.5.3 Everyday life. Objectives:

- Design to legitimise home based work addressing flexibility, isolation and nuisance
- Design should be flexible and easy to adapt to meet different needs as they change over time
- Design to consider the needs of pets and their owners
- Design should consider everyday activities and their implications on home standards
- Design standards acknowledge diverse users who experience spaces differently such as autism, dementia or those with poor eyesight.

2.5.4 Buildings as systems. Objectives:

- Reduce waste, particularly through the ease and efficiency of waste collection
- Reduce water use and the load on the water network
- Zero carbon through efficiencies and renewable energy
- Easy and efficient building management
- Facilitate the transition to the circular economy
- Cycling is safe and convenient

2.5.5 **Healthy neighbourhoods. Objectives:**

- The neighbourhood, communal spaces and the home are comfortable, attractive and enjoyable
- Residents have control over their environment
- Environmental parameters including daylight sunlight, overheating, energy demand, wind, outlook and noise are balanced holistically for optimal conditions
- Buildings and homes are resilient to the impacts of climate change

2.6 These objectives are then translated into 93 design guidelines structured around the different areas of the building:

- 2.6.1 Around the building
- 2.6.2 Communal spaces
- 2.6.3 Home

3. Legislative and Policy Context

Sustainability Appraisal (SA)

3.1 A Sustainability Appraisal (SA) considers the potential impacts of a planning policy document on the environmental, economic, and social aspects of sustainability. It does this by assessing the extent to which the planning document will help achieve a set of sustainability objectives that cover a range of issues, including air quality, landscape, water, health and the population. The SA also has to satisfy the requirements of the European Directive 2001/42/EC on the assessment of the effects of certain planning

documents and programmes on the environment (known as the Strategic Environmental Assessment Directive – for more information, see below).

- 3.2 There is a statutory requirement for SAs to be produced for Development Plan Documents, but not for other kinds of planning documents. There is no legal requirement for an SA to be produced for a supplementary planning document (PPG on Strategic Environmental Assessment and Sustainability Appraisal, paragraph 026).
- 3.3 An SA was undertaken in 2017 as part of the Integrated Impact Assessment (IIA) of the Tower Hamlets Local Plan 2031, with an addendum added in March 2019 to cover modifications to the plan. The plan (and its SA) underwent an examination in public and was adopted in January 2020.
- 3.4 The sustainability objectives for the Local Plan SA were developed through a comparison of existing sustainability objectives in the borough, the objectives of the Local Plan, and the identification of sustainability issues through the scoping process for the IIA. The SA was publicly consulted on as part of the consultation process for the Local Plan. The sustainability objectives from that SA are set out in table 1 below.

<p>1. Equality: reduce poverty and social exclusion and promote equality for all communities.</p> <p>2. Liveability: promote liveable, safe, high quality neighbourhoods with good quality public services.</p> <p>3. Health and wellbeing: improve the health and wellbeing of the population and reduce health inequalities.</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>5. Transport and mobility: create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.</p> <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> <p>7. Employment: reduce worklessness and increase employment opportunities for all residents. 8. Economic growth: create and sustain local economic growth across a range of sectors and business sizes.</p> <p>9. Town centres: promote diverse and economically thriving town centres.</p> <p>10. Design and heritage: enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.</p> <p>11. Open space: enhance and increase open spaces that are high quality, networked, and multi-functional.</p> <p>12. Climate change: ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.</p> <p>13. Biodiversity: protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.</p> <p>14. Natural resources: ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.</p> <p>15. Flood risk reduction and management: to minimise and manage the risk of flooding.</p> <p>16. Contaminated land: improve land quality and ensure mitigation of adverse effects of contaminated land on human health.</p>
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Table 1: Tower Hamlets Local Plan Integrated Impact Assessment Sustainability Objectives (2017)

Strategic Environmental Assessment (SEA)

- 3.5 A Strategic Environmental Assessment (SEA) is an assessment of the likely effects of a plan or programme on the environment. The requirement for an SEA is set out in the SEA Directive (2001/42/EC), transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (known as the SEA Regulations). This particularly relates to plans which designate sites for development.
- 3.6 The purpose of an SEA is to ensure a high level of protection of the environment and to integrate consideration of the environment into the preparation and adoption of plans with a view to promoting sustainable development. SEAs must take account of the likely significant effects on the environment, including on issues such as biodiversity, population and human health, fauna, flora, soil, water, air quality, climate, material assets, cultural heritage, landscape, and the interrelationship between these factors. The SEA process sets out criteria for assessing the significance of the impact of a plan on the environment. If a significant effect is possible the assessment requires the consideration of alternative options.
- 3.7 SEA considers only the environmental effects of a plan, whereas SA considers the plan's wider economic and social effects in addition to its potential environmental impacts. The requirements of the SEA are subsumed within the requirements of the SA – that is, an SA requires all the detail expected of an SEA, and then more. Therefore, the objectives developed as part of the SA of the Local Plan can be extracted to cover the required considerations for an SEA. The correspondence between the SA objectives and the likely significant effects for an SEA to consider are set out in Appendix C of the Integrated Impact Assessment, and summarised in table 2 below. These are the SA objectives that will be used when considering the effects of the Spitalfields Neighbourhood Plan for the purpose of the SEA screening.

SEA Dimension	Relevant SA Objective
Biodiversity, Flora and Fauna	13. Biodiversity
Population and Human Health	2. Liveability

	3. Health and Wellbeing
Soil	14. Natural Resources 16. Contaminated Land
Water	14. Natural Resources 15. Flood Risk Reduction and Management
Air Quality	14. Natural Resources
Climate	12. Climate Change
Material Assets	14. Natural Resources 15. Flood Risk Reduction and Management 16. Contaminated Land
Cultural Heritage	10. Design and Heritage
Landscape	10. Design and Heritage 11. Open Space

Table 2: Correspondence between SEA dimensions and SA objectives

3.8 A **supplementary planning document** is considered to be a plan or programme as defined by the SEA Regulations. Under Article 3(3) of the SEA Directive, plans or programmes which “determine the use of small areas at a local level” or constitute “minor modifications to plans and programmes” only require an SEA if there are likely to be significant environmental effects that have not already have been assessed during the preparation of the Local Plan. Regulation 9 of the SEA Regulations requires the responsible authority (Tower Hamlets Council in this case) to undertake a screening exercise to determine whether or not a plan or programme is likely to have significant environmental effects and would therefore be subject to an SEA. This is also set out in the PPG on Strategic Environmental Assessment and Sustainability Appraisal, paragraph 008.

3.9 The screening exercise looks at the proposals in the SPD to see if a significant effect is likely. The criteria for the screening exercise are set out in the relevant legislation and explained in the next section of this report.

Habitats Regulation Assessment (HRA)

- 3.10 Habitats Regulation Assessment (HRA) is a process which looks at the potential impact of proposals within a plan (either individually or in combination with others) on European protected wildlife sites – consisting of Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar wetland sites. This assessment is required by the European Habitats Directive (92/43/EEC), transposed into UK law as the Conservation of Habitats and Species Regulations 2017 (as amended).
- 3.11 The initial stage of the HRA process involves consideration of the reasons for designation and the conservation objectives of each designated wildlife site within a reasonable distance of the neighbourhood plan area, and the potential impact of proposals within the plan on these sites.

4 Screening Exercise

4.1 The process of screening a plan or programme to determine whether an SEA is required is set out in figure 2 below. This figure is taken from A Practical Guide to the Strategic Environmental Assessment Directive, issued by the Office of the Deputy Prime Minister in 2005. This approach is commonly used in SEA screening exercises at the current time.

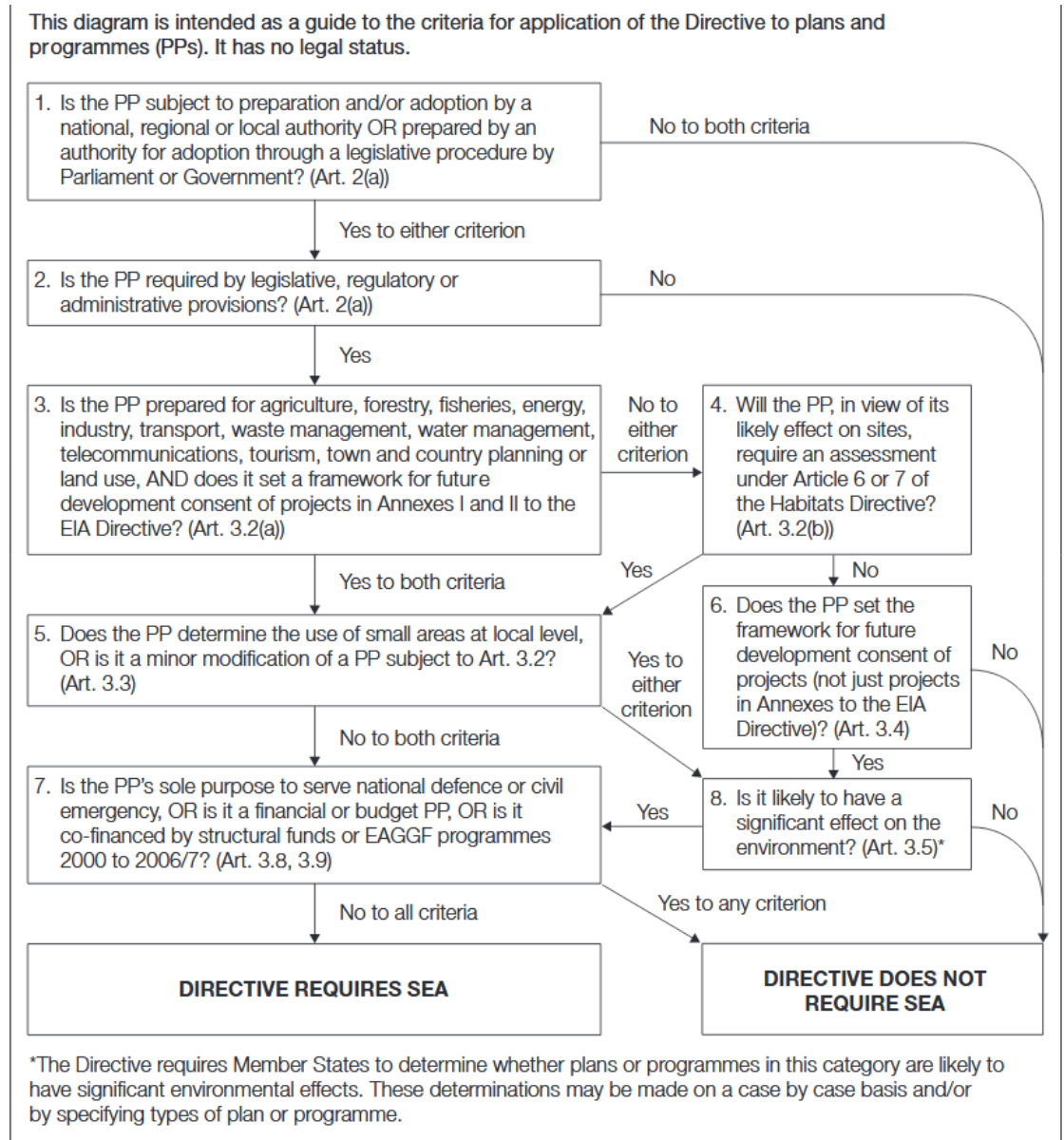


Figure 2: Application of the SEA Directive to plans and Programmes

4.2 Table 3 below assesses the High Density Living SPD against the criteria in figure 2.

Stage	Y/N	Reason
1. Is the plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Article 2(a))	Y	The SPD will be prepared and adopted by Tower Hamlets Council in its role as Local Planning Authority.
2. Is the plan required by legislative, regulatory or administrative provisions? (Article 2(a))	N	The preparation of a supplementary planning document is optional. However, once adopted it will be a material consideration when determining planning applications. It is therefore considered important that the screening process considers whether the High Density Living SPD is likely to have significant environmental effects invoking the need for a full SEA, and the assessment should proceed to step 3.
3. Is the plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article 3.2(a))	Y N	The SPD is intended to provide further guidance to Tower Hamlets Local Plan 2031 which is the planning policy framework for its area, including policy for land-use. The Local Plan has been subject to full Sustainability Appraisal (including SEA). However, it relates only to the design of individual new high density residential development and therefore it does not set a framework for future development consent for projects listed in the Schedule II of the EIA Directive. (No to either criterion, go to question 4)
4. Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	N	The Tower Hamlets Local Plan 2031 (January 2020) rules out any adverse effects on Natura 2000 sites. As the SPD will not change or add to policy, proposals or designations within the Local Plan, it is not considered that further screening for such assessment is

		necessary as there would be no likely effects on European Sites.
5. Does the plan determine the use of small areas at local level, OR is it a minor modification of a plan or programme subject to Article 3.2? (Article 3.3)	N	The SPD will be a material consideration in the consideration of planning applications for new high density development proposals in the Borough. The SPD does not modify the plan, just adds detail to it and doesn't determine use of sites. The SPD only recommends guidance for high density developments that happen to be proposed.
6. Does the plan set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Article 3.4)	N	The SPD will be a material consideration in the consideration of planning applications for new high density development proposals in the Borough.
7. Is the plan's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Articles 3.7, 3.8)	N	The SPD does not address these issues.
8. Is it likely to have a significant effect on the environment? (Article 3.5)	N	<p>It is not likely that the SPD will have any significant effect within Tower Hamlets that has not already been assessed through Sustainability Appraisal (including SEA) of the Tower Hamlets Local Plan 2031.</p> <p>The assessment of Local Plan policies relevant to high density residential developments concluded that there were predominantly positive impacts and no overall negative impacts when assessed against the Local Plan SA Objectives.</p> <p>The additional guidance which supplements each policy in the SPD will provide further detail tailored to inform high density residential design. Although there may be some environmental effects of providing specific guidance, the assessment of significant effects has already been covered in</p>

	<p>principle in the SA of the Local Plan.</p> <p>Therefore, it is considered that the SPD does not need to be subject to further SEA. In addition, each policy has already been assessed through Sustainability Appraisal (including SEA) of the Local Plan. Local Plan policies that are likely to be specifically within the scope of the further guidance within the SPD are as follows:</p> <ul style="list-style-type: none"> • Policy S.DH1: Delivering high quality design • Policy D.DH2: Attractive streets, spaces and public realm • Policy D.DH6: Tall buildings • Policy D.DH7: Density • Policy D.DH8: Amenity • Policy D.H3: Housing standards and quality • Policy S.CF1: Supporting community facilities • Policy D.CF3: New and enhanced community facilities • Policy S.OWS1: Creating a network of open spaces • Policy D.OWS3: Open space and green grid networks • Policy S.ES1: Protecting and enhancing our environment • Policy D.ES2: Air quality • Policy D.ES3: Urban greening and Biodiversity • Policy D.ES5: Sustainable drainage • Policy D.ES6: Sustainable water use and infrastructure and wastewater management
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	<ul style="list-style-type: none"> • Policy D.ES7: A zero carbon borough • Policy D.ES9: Noise and vibration • Policy D.ES10: Overheating • Policy D.MW3: Waste collection facilities in new development
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Table 3: SEA Screening of the High Density Living SPD

- 4.3 The conclusion of the assessment is that an SEA is only required if the Supplementary Planning Document is likely to have significant effects on the environment. Section 5 of this report provides a detailed assessment of the likely significance of effects to determine whether this is the case.
- 4.4 Section 5 of this report will then screen the High Density Living SPD to determine whether a full HRA is required.

5. Assessment of Likely Significant Effects

5.1 The criteria for assessing the likely significance of effects stemming from a plan or programme are set out in Annex II of the SEA Directive (Schedule 1 of the SEA Regulations), and are quoted below in box 3.

1. The characteristics of plans, having regard, in particular, to:
 - The degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources
 - The degree to which the plan influences other plans and programmes including those in a hierarchy
 - The relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development
 - Environmental problems relevant to the plan
 - The relevance of the plan for the implementation of Community [i.e. European Community] legislation on the environment (e.g. plans and programmes linked to waste management or water protection)
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
 - The probability, duration, frequency and reversibility of the effects
 - The cumulative nature of the effects
 - The transboundary nature of the effects
 - The risks to human health or the environment (e.g. due to accidents)
 - The magnitude and spatial extent of the effects (geographical area and size of the population to be affected)
 - The value and vulnerability of the area likely to be affected due to:
 - Special natural characteristics or cultural heritage
 - Exceeded environmental quality standards or limit values
 - Intensive land-use
 - The effects on areas or landscapes which have a recognised national, [European] Community or international protection status

	SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)	Comment
The characteristics of plans and programmes, having regard, in particular, to:		
1a)	The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The SPD will provide further guidance to the policies, proposals and the allocations that are contained within the Tower Hamlets Local Plan 2031 which already sets the framework for the development projects and activities that could occur within the Tower Hamlets area. The Local Plan as a whole, including those policies relevant to housing and tall buildings design, have been fully assessed for the purposes of SA/SEA. There will be no new policies or site allocations contained in the SPD. The SPD provides further information and guidance on implementation and interpretation of the existing policies through specific design details (for example materials, room layouts, location of spaces etc.)
1b)	The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The High Density Living SPD, in providing further guidance to the framework set within the Local Plan, does not directly affect other specific public sector plans or programmes but rather is influenced by the Local Plan and other higher tier planning policy, including the NPPF.
1c)	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	The Local Plan and other higher level policies set the context for achieving sustainable development. The SPD will provide further guidance as to how this can be achieved (for example by providing design recommendations on biodiversity). The SPD will not revisit or change the higher level policy requirements which have been subject to SA/SEA. The SA Report (March 2019) shows that the policies relevant to housing and tall buildings design have a positive impact overall and a

		specifically positive impact for the majority of the SA objectives when assessed against these. The SPD is intended to provide further guidance to Tower Hamlets Local Plan 2031 on how the high density buildings can be designed to meet the relevant policies including policies related to promoting sustainable development such as sustainable urban drainage, accessibility and safety.
1d)	Environmental problems relevant to the plan or programme	The Local Plan SA did not identify any negative effects against the SA Objectives for the policies relevant to housing and tall buildings design.
1e)	The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	It is unlikely that there would be any significant impact resulting from the further guidance for High Density Living SPD.
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a)	The probability, duration, frequency and reversibility of the effects	The SPD will cover the same period of time as the Tower Hamlets Local Plan 2031. A Sustainability Appraisal was undertaken for the Local Plan which included an assessment of the policies relevant to housing and tall buildings design that will be supplemented by the SPD. The evidence to support the SA for the Local Plan continues to be updated and the assessment looked at the probability, duration, frequency and reversibility of effects. Whilst the SPD will provide further guidance and supplement the existing policies in the Local Plan (and have largely positive effect), the probability, duration, frequency and reversibility of the effects from the implementation of the SPD will remain the same.
2b)	The cumulative nature of the effects	There are no likely cumulative effects that would result from the production of the High Density Living SPD.

2c)	The trans-boundary nature of the effects	There will be no national trans boundary effects resulting from the High Density Living SPD given that it will only apply on a district wide basis. Local administrative trans boundary effects were considered as part of the SA/SEA of the Local Plan.
2d)	The risks to human health or the environment (e.g. due to accidents)	Human health and environmental effects were assessed in the SA for the Local Plan (Policy S.ES1 - Protecting and enhancing our environment). No risks to human health or the environment were identified in relation to the policies relative to housing and tall buildings design. Further specific guidance on housing design will provide more certainty that the probable positive effects already assessed in the SA for the Local Plan will arise.
2e)	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The spatial extent of the SPD will be the same as the area covered in the Local Plan. The potential impacts of development proposals in this geographical area have been assessed as part of the SA/SEA of the Local Plan. The SPD will focus on the comprehensive approach to development delivery in a way which will enhance the consideration given to housing design and in turn reduce the likelihood of adverse impacts arising with respect to safety, access, parking, cycling, walking, flood risk and drainage.
2f)	The value and vulnerability of the area likely to be affected due to: I. special natural characteristics or cultural heritage, II. exceeded environmental quality standards or limit values III. intensive land use	The value and vulnerability of the area of the SPD have been considered as part of the SA/SEA of the Local Plan. The intensiveness of the proposed use of land is a factor for which information was available at the time of the SA/SEA assessment of the Local Plan and no significant impacts were identified in relation to this.
2g)	The effects on areas or landscapes which have a recognised national, Community or international protection status	The SPD is unlikely to result in significant effects on landscapes which have a recognised national, Community or international protection status.

6. Habitats Regulation and Assessment Screening

- 6.1 A Habitats Regulation Assessment (HRA) examines the potential impacts of a plan or programme, whether alone or cumulatively, on European protected sites. These sites are Special Protection Areas (SPAs) designated under the Bird Directive 79/409/EEC and Special Areas of Conservation (SACs) designated under the Habitats Directive 92/43/EEC. It is government policy that HRAs should also consider sites designated under the Ramsar Convention of 1971 (known as 'Ramsar sites') in the same way as the European protected sites.
- 6.2 The first stage of the HRA process is a screening exercise where the details of nearby designated sites are assessed to see if there is the potential for the plan or programme to have an impact on the sites. For the purposes of the screening exercise, the potential impact of the Spitalfields Neighbourhood Plan on designated sites within 15km of the neighbourhood area will be considered.
- 6.3 There are five European protected sites or Ramsar sites within 15km of the Spitalfields Neighbourhood Area. These sites are:
- Epping Forest SAC
 - Richmond Park SAC
 - Wimbledon Common SAC
 - Lee Valley SPA
 - Lee Valley Ramsar
- 6.4 None of these sites is closer than 3km to the neighbourhood area, so the plan cannot influence development in the direct vicinity of any of the sites.
- 6.5 The HRA of the Tower Hamlets Local Plan 2031 identified that the main reasons for 'unfavourable' ratings of the condition of the designated sites were due to public access, air pollution, and inappropriate management. The High Density Living SPD cannot affect the management of these sites, and therefore the only potential for adverse impacts on these sites from development in this

form would be through increased visitor pressure from a large population increase, or an increase in negative air quality impacts.

- 6.6 The High Density Living SPD provides design recommendations that aims to increase the level of greenery and biodiversity across the Borough, partially with the intention of improving air quality, although it is considered that the impact of this design recommendation will be no more significant than existing Tower Hamlets planning policies on this topic and is unlikely to have an effect on the designated sites.
- 6.7 The High Density Living SPD does not set any additional growth targets or site allocations, and therefore does not propose any more development than that planned for in the Tower Hamlets Local Plan 2031. The Local Plan was subject to an HRA screening as part of the Integrated Impact Assessment. This screening concluded that the Local Plan would have no significant effects (alone or in combination) on any of the sites due to an absence of impact pathways, policy controls within the plan which can ensure significant effects are avoided, and some suggested changes to the plan which were accepted by the Council and included in the adopted Local Plan. As part of the examination process, a technical note was appended to the HRA justifying how the Local Plan HRA was in line with the outcome of the 'People Over Wind' decision, and had not considered mitigation measures as part of the HRA screening process. This position was accepted by Natural England, and the Integrated Impact Assessment (including the HRA screening) was successfully examined as part of the Local Plan examination process.
- 6.8 As the scale of development proposed by the High Density Living SPD does not exceed that proposed by the Local Plan, it is considered that the High Density Living SPD cannot have any additional significant impact (either by itself or cumulatively with other plans and programmes) than the Local Plan itself. The findings of the HRA screening of the Local Plan are therefore considered to apply in this situation, and no further HRA screening of the High Density Living SPD is required.

7. Conclusion

7.1 On the basis of the SEA screening assessment carried out in this document, it is concluded that the High Density Living SPD will not have any significant effects in relation to the criteria set out in Schedule 1 of the SEA Regulations Hamlets that have not already been assessed through Sustainability Appraisal (including SEA) of the Tower Hamlets Local Plan 2031, and therefore does not need to be subject to a full SEA, as the SPD will not change or introduce new planning policy over and above the Tower Hamlets Local Plan 2031.

7.2 Therefore, it is considered that the SPD does not need to be subject to further SEA. The key areas where the SPD adds to the Local Plan policy is in terms of guidance for high density housing design with respect to masterplanning, access, design, walking/cycling networks, urban drainage, green infrastructure, biodiversity, and water management.

7.3 To conclude, it is not considered that SEA is a formal requirement given that the principles within the SPD have already been covered in the Local Plan SA.

8. Consultation

- 8.1 The draft report was sent for consultation to the three statutory consultees – Natural England, Historic England and the Environment Agency- as required under Regulation 11(1) of the SEA Regulations. The consultees were given six weeks to respond. Responses are reproduced below.
- 8.2 It is considered that the responses of the statutory consultees do not give rise to any further changes to the SEA/HRA Screening Report on its conclusions. Natural England did not have any comments. Historic England agreed that the SPD does not require a separate SEA given that the emerging local plan has been subject to a full Sustainability Appraisal. The Environmental Agency had no comments in regards to the SEA screening and pointed to recent evidence and studies in regards to water and management strategy to be noted in any future work on the topic.

Historic England

Date 08/12/2020

High density SPD screening

Please find attached brief Historic England response to the above consultation. Please come back to me if you require any further information.

Regards

Tim Brennan

Thank you for the opportunity to comment on the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

We would agree that the SPD in question does not require a separate SEA given that the emerging local plan has been subject to a full Sustainability Appraisal.

It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully,

Tim Brennan MRTPI
Historic Environmental Planning Adviser

Natural England

Date 12/11/2020

FW: FAO Ms L Cerrada Morato High Density Living Supplementary Planning Document - SEA/HRA Screening

FAO Ms Lucia Cerrada Morato

Dear Madam,
Please find attached below the response from Natural England for your information.

Yours faithfully,
Beth Seale

Beth Seale
Operations Delivery
Consultation Team

High Density Living Supplementary Planning Document - SEA/HRA Screening

Thank you for your consultation request on the above dated and received by Natural England on 28th October 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on this consultation.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours sincerely
Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

Date 09/12/2020

RE: Consultation on SEA/HRA Screening of High Density Living Supplementary Planning Document

Thank you for your consultation on the below. We do not normally comment on High Density Living documents however in this case we do have comments relating to water resources and management. We are pleased to see that *Reduce water use and the load on the water network* has been identified as one of the objectives. We would just like to draw your attention to the recently published Isle of Dogs & South Poplar Integrated Water Management Strategy (IWMS). With the Isle of Dogs & South Poplar being designated as an Opportunity Area for growth in the London Plan, and the expected level of development with the potential to significantly increase water demand in the Opportunity Area, leading in turn to additional pressure on the sewerage system. High density living areas will need to be mindful of impacts and enabling sustainable growth in areas classified as seriously water-stressed. The evidence in the IWMS indicates that the maximum potable water consumption target of 105 l/h/d (as specified in the Intention to Publish London Plan 2019 and the Tower Hamlets Local Plan 2031) is too high for the Isle of Dogs & South Poplar Opportunity Area, given the expected level of development. This is worth bearing in mind with the future development of the High Density Living SPD.

Please do not hesitate to contact me with any further queries.

Kind regards

Eleri

Eleri Randall

Sustainable Places Planning Advisor

Environment Agency - Hertfordshire & North London.

Appendix 1: Sustainability Appraisal of Local Plan Policies

- Policy S.DH1: Delivering high quality design
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy D.DH6: Tall buildings
- Policy D.DH7: Density
- Policy D.DH8: Amenity
- Policy D.H3: Housing standards and quality
- Policy S.CF1: Supporting community facilities
- Policy D.CF3: New and enhanced community facilities
- Policy S.OWS1: Creating a network of open spaces
- Policy D.OWS3: Open space and green grid networks
- Policy S.ES1: Protecting and enhancing our environment
- Policy D.ES2: Air quality
- Policy D.ES3: Urban greening and Biodiversity
- Policy D.ES5: Sustainable drainage
- Policy D.ES6: Sustainable water use and infrastructure and wastewater management
- Policy D.ES7: A zero carbon borough
- Policy D.ES9: Noise and vibration
- Policy D.ES10: Overheating
- Policy D.MW3: Waste collection facilities in new development

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p>Likely Significant Effects</p> <p>Policy S.DH1 requires development proposals to demonstrate good design principles, partly to protect and enhance amenity – promoting mental and physical well-being of occupants/users of the site and neighbouring properties. S.DH1 also includes criteria to ensure that development proposals are adaptable to the changing needs of users and that open spaces are publicly accessible. These factors indirectly contribute to this SA objective through ensuring access to high quality places for a range of demographic groups, which could promote social cohesion and integration and reduce social exclusion.</p> <p>Policy D.DH2 requires development proposals to provide a range of public spaces that can function as places for social gatherings and also resists the creation of gated communities, a principal that is relevant to this objective. This could enhance social interactions within neighbourhoods, resulting in an indirect positive effect on this SA objective through improved social cohesion and integration.</p> <p>Policies D.DH6, D.DH7 and D.DH8 make a minor positive contribution and seek to ensure that all communities enjoy a comfortable living environment.</p> <p>Mitigation</p> <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>Policy S.DH1 and Policy D.DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design. This would ensure that developments provide permeable, multi-functional and connecting street infrastructure and high quality public realm provision, such that these policies directly contribute to this SA objective.</p> <p>Policy S.DH1 also sets out criteria to ensure that development creates well connected and integrated places and that over - development of sites is avoided.</p>	++	++	~	~	~	+	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>It was previously suggested that Strategic policy S.DH1 could highlight the need for all development to incorporate designing out crime principles. Policy D.DH2 references Secured by Design.</p> <p>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>Policy S.DH1 requires development proposals to demonstrate good placemaking principles, seeking to ensure that developments are supported by publicly accessible open spaces that promote health and well-being. This would provide opportunities to participate in recreational activities, encourage active travel and increase social interactions, all of which would increase health and wellbeing and directly contribute to this SA objective. As such the policy would have a significant positive effect on this SA objective.</p> <p>Policy S.DH1 also sets out criteria to ensure that proposed developments are designed to be adaptable to the changing needs of users and that the effects on microclimate are taken into account. The policy also seeks to ensure that development mitigates the impacts of noise, overheating and air pollution. Consequently the policy would have a significant positive effect on this SA objective.</p> <p>Policy D.DH2 requires development proposals promote a well-connected, joined up and easily accessible street network and wider network of public spaces by taking steps to improve and enhance connectivity, permeability and legibility. This would encourage development proposals to embed active travel infrastructure within street networks, which could increase participation in, and the safety of, active travel, resulting in indirect positive physical health outcomes and therefore indirectly contributing to this SA objective.</p> <p>Policy D.DH6 makes a minor positive contribution by requiring developments with tall buildings, which include residential use, to provide high quality private and communal open space and play areas for local residents. Development outside of Tall Building Zones must also meet three criteria, which include demonstrating that it can deliver significant publicly accessible open space.</p> <p>Policy D.DH7 in relation to densities will contribute to this objective by ensuring that developments exceeding the appropriate density range in the London Plan should</p>	++	+	~	~	~	+	+	++	~	~	~	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>Uncertainties</p> <p>None identified.</p>												
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p>Likely Significant Effects</p> <p>There is no clear relationship between these 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
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p>Likely Significant Effects</p> <p>Policy S.DH1 and Policy D.DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design. These policies would improve the appearance of neighbourhoods and enhance the quality of the built environment, which would be likely to support investment by existing and new businesses, resulting in local business growth, wider economic growth and regeneration of neighbourhoods in need of socio-economic renewal. The policies would therefore have a significant positive effect on this SA objective.</p> <p>D.DH6 directs Tall Building proposals to designated Tall Building Zones. This could help create clusters of firms that desire such a location, it is uncertain how relevant this would be as a locational factor so a minor positive effect has been recorded.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p>	++	++	~	~	~	+	~	~	~	~	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>All of the policies therefore directly contribute to this SA objective and would have a significant positive effect on it through ensuring that development proposals are appropriately sited, designed and integrated with their surroundings.</p> <p>Mitigation None identified.</p> <p>Assumptions None identified.</p> <p>Uncertainties 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>Policy S.DH1 requires development proposals to provide a mix and range of publically accessible open spaces that promote biodiversity, health and well-being.</p> <p>Policy D.DH2 requires development proposals promote a well-connected, joined up and easily accessible street network and wider network of public spaces by taking steps to improve and enhance connectivity, permeability and legibility. As such the policy could help link and enhance open spaces, resulting in a significant positive effect on this SA objective.</p> <p>Policy D.DH6 makes a minor positive contribution by requiring developments with tall buildings to provide high quality private and communal open space and play areas for local residents. Development outside of Tall Building Zones must also demonstrate that it can deliver significant publicly accessible open space.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p>	++	++	~	~	~	+	~	~	~	~	~	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<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>Policy S.DH1 requires development proposals to demonstrate good placemaking principles, including through the optimisation of energy and waste efficiency and measures to avoid overheating. As such the policy would contribute to and have a minor positive effect on this SA objective.</p> <p>Policy D.DH2 requires development proposals improve connectivity to public transport hubs, town centres, open spaces and social and community facilities. This would help ensure that streets and wider transport networks function efficiently, as well as encouraging active travel modes, reduced car travel and sustainable modal shifts. A minor positive effect is identified in relation to this objective as the resulting scale and significance of any reduction in carbon emissions is unknown.</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>Policy S.DH1 requires development proposals to provide open spaces that promote biodiversity. As such the policy would contribute to and have a significant positive effect on this SA objective.</p> <p>Policy D.DH6 sets out criteria to assess the acceptability of tall building proposals, including specifically a requirement to avoid adverse impacts on biodiversity. This would safeguard ecological interests, although taking account of the narrow scope</p>	++	~	~	~	~	+	~	~	~	~	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>of this policy in relation to biodiversity, only a minor positive effect on this SA objective is predicted.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</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>Likely Significant Effects</p> <p>Policy S.DH1 requires development proposals to optimise energy and waste efficiency. Consequently the policy would support the development of the circular economy and contribute to this SA objective.</p> <p>Policy D.DH2 requires development proposals to improve connectivity to public transport hubs, town centres, open spaces and social and community facilities. Consequently the policy could indirectly help to improve local air quality and therefore contribute to this SA objective.</p> <p>Policy D.DH6 includes a requirement that tall buildings do not have an adverse impact on watercourses and water bodies and a minor positive effect is identified on this basis.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p>	++	+	?	?	?	+	?	?	?	?	?	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>Uncertainties</p> <p>None identified.</p>												
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p>Likely Significant Effects</p> <p>Policies S.DH1 and D.DH2 require development proposals to incorporate high-quality public and open spaces, which could reduce surface run-off and therefore reduce flood risks. Consequently these policies contribute to and would have a significant positive effect on this SA objective.</p> <p>Policy D.DH6 requires proposals for tall buildings to demonstrate that they will not adversely impact on water courses and their hydrology, it also requires the provision of open space which could help reduce surface run-off.</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>	++	++	?	?	?	+	?	?	?	?	?	++
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 D.DH8 safeguards human health by requiring development proposals to avoid unacceptable nuisances and pollution impacts. This would help to ensure that contaminated land is adequately and safely remediated, resulting in reduced adverse health risks. Consequently the policy would have a significant positive effect on this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p>	?	?	?	?	?	?	?	++	?	?	?	0

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		S.DH1: Delivering high quality design	D.DH2: Attractive Streets, Spaces, and Public Realm	Policy D.DH3: Heritage and the historic environment	D.DH4: Shaping and managing views	S.DH5: World Heritage Sites	D.DH6: Tall Buildings	D.DH7: Density	D.DH8: Amenity	D.DH9: Shopfronts	D.DH10: Advertisements, and hoardings and signage		D.DH11: Telecommunications
	<p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>												

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><u>Likely Significant Effects</u></p> <p>Policies S.H1 D H4, D.H5 and D.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.</p> <p>Policy D.H2 aims to ensure the availability of affordable housing in new developments. It contains criteria for estate regeneration which requires development schemes to protect and enhance open space and community facilities, as well as bring existing homes up to the latest decent homes standard.</p> <p>Policy D.H3 requires residential developments to protect or re-provide 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>Policy D.H7 directs houses in multiple occupation (HMO) to areas of high transport accessibility. Significant positive effects are anticipated for the identified policies.</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
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
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 (including measures to ensure that estate regeneration schemes meet housing need and requiring good housing design standards to be met).</p> <p>Significant positive effects are anticipated from all policies in this Chapter.</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
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	
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 S.H1, D.H4, D.H5 and D.H6 direct residential developments, including for specialist housing, to areas with high accessibility and suitable infrastructure provision. This would have an indirect minor positive effect on this SA objective through improving the accessibility of the transport network, with potential secondary positive impacts in terms of sustainable modal shift, transport efficiency and providing support for investment to increase transport infrastructure capacity and connectivity. Policy D.H7 also directs HMOs to areas with high transport accessibility.</p> <p>As policies D.H2 and D.H3 do not direct housing to specific locations or specify different infrastructure requirements there is no clear relationship between the policy and this SA objective.</p> <p><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
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><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"> • Policies S.H1 and D.H5 provides a settled base for Gypsies and Travellers (G&Ts) which will enable any G&T children to access education facilities. • Policy D.H6 supports the provision of student housing close to education institutions and in highly accessible locations, which would enable the Borough to accommodate a growing student population and therefore indirectly contribute to the growth of education institutions and other learning opportunities. • Policy D.H7 contributes to this objective by requiring houses in multiple occupation to be located in areas of high transport accessibility. <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
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><u>Likely Significant Effects</u></p> <p>Policy D.H6 indirectly contributes to this SA objective as it directs student accommodation to highly accessible locations, which are likely to include Town Centres, which would increase footfall and support their vitality, a minor positive effect is identified on this basis. Policy D.H4 also directs housing for older and vulnerable people to locations with local services, which could indirectly support the vitality of Town Centres and other centres by maintaining and increasing footfall within them, a minor positive effect is also identified on this basis.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><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
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><u>Likely Significant Effects</u></p> <p>Policy S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through promoting high quality design. The policy also requires account to be taken of the cumulative effects of development. A minor positive effect is identified on this basis.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><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
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><u>Likely Significant Effects</u></p> <p>Policy S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through ensuring a placemaking approach to development, a minor positive effect is identified.</p> <p>Policy D.H3 sets minimum open space standards for residential developments and safeguards existing amenity space, therefore directly contributing to this SA objective and a significant positive effect is identified.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><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
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><u>Likely Significant Effects</u></p> <p>Policy S.H1 requires all residential development proposals to be appropriate, high-quality, well-designed and sustainable, which in general terms aligns will support alignment with this SA objective (in that it will include consideration of low carbon and zero carbon design, consistent with the Mayor's Housing Supplementary Planning Guidance).</p> <p>Policy D.H4 directs Specialist housing proposals to locations with good public transport accessibility and infrastructure. Policy D.H7 directs HMOs to areas of high transport accessibility. Policy D.H6 directs proposals for student accommodation to areas of high transport accessibility. In line with this SA objective these policies would indirectly ensure access to public transport for new residents, supporting sustainable modal shifts leading to carbon emissions reduction, minor positive effects are identified.</p> <p>As drafted there is no clear relationship between the other Housing policies and this SA objective.</p> <p><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
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><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 S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through requiring consideration of the relationship between the proposal and the surrounding environment including habitats and species. In addition policy D.H3 requires residential proposals to protect existing amenity space, which could indirectly safeguard habitats and therefore support this objective, minor positive effects are identified.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><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
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	D.H7: Housing with shared facilities	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><u>Likely Significant Effects</u></p> <p>These policies do not directly contribute to this SA objective. However, Policies S.H1, D.H4 and D.H6 direct housing proposals to locations with good public transport accessibility and infrastructure. The proposed use of more sustainable, accessible locations which could indirectly safeguard air quality by maximising public transport commuting rather than increased car travel. As such the policies are predicted to have an indirect minor positive effect on this SA objective.</p> <p>There is no clear relationship between the other Housing policies and this SA objective.</p> <p><u>Mitigation</u></p> <p>None identified.</p> <p><u>Assumptions</u></p> <p>Potential effects in relation to air quality are highlighted for consideration in other policies, e.g. Policy S.ES2.</p> <p><u>Uncertainties</u></p> <p>None required.</p>	+	~	~	+	~	+	~	+

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodation	D.H6: Student housing	
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><u>Likely Significant Effects</u></p> <p>None of these policies address site specific or flood risk matters, resulting in a lack of direct effects on this SA objective. However, Policy S.H1 requires all residential development proposals to be well-designed and sustainable, which in general terms aligns with this SA objective through incorporating sustainability considerations into the design of proposals, a minor positive effect is identified. Potential effects associated with the location of housing in areas at flood risk are considered in the assessment of strategic 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 S.H1 has taken account of any known flood risks in these locations/areas.</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>Given that development in the Borough will predominantly involve the use of previously developed land and buildings, which if contaminated, will require appropriate remediation, there is likely to be a minor positive effect on 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>	+	+	+	+	+	+	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
<p>1. Equality: Reduce poverty and social exclusion and promote equality for all communities.</p>	<p><u>Likely Significant Effects</u></p> <p>Policy S.CF1 requires development proposals to protect existing community facilities and contribute to the capacity, quality, usability and accessibility of existing facilities. This would directly contribute to this SA objective through increasing opportunities to reduce social exclusion and promote integration through community based activities.</p> <p>Policy D.CF2 sets out criteria to safeguard existing community facilities, which would protect existing opportunities to promote social cohesion and integration and therefore have a positive effect on this SA objective.</p> <p>Policy D.CF3 makes a minor positive contribution to this objective by directing new facilities locations that will be accessible to people living outside the development.</p> <p>Policy D.CSF4 seeks to protect existing public houses from development pressures and will 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>	++	+	+	+	++
<p>2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services</p>	<p><u>Likely Significant Effects</u></p> <p>Directly in alignment with this SA objective, these policies set out criteria to protect existing services and facilities and to support new ones in accessible and appropriate locations.</p> <p><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
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
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 S.CF1 requires development proposals to protect existing facilities and improve them and to deliver new facilities in appropriate locations. This would directly contribute to this SA objective and a significant positive effect is identified.</p> <p>Policy S.CF1 also directs proposals for new health infrastructure/facilities to accessible locations, which would ensure that enhanced infrastructure provision can increase access to healthcare services. As such this policy would directly contribute to this SA objective by addressing issues of wide and equitable access to health care facilities.</p> <p>Policy D.CF2 sets out criteria to safeguard existing community facilities (including health facilities), which will also directly contribute to this objective.</p> <p>Policy D.CF3 seeks to locate new community facilities at accessible locations and ensure that play space provision associated with schools can meet relevant standards.</p> <p>Policy D.CF4 seeks to protect existing public houses from development pressures. This could improve wellbeing through reducing social exclusion and increasing social cohesion, however the net positive effects of the policies are potentially reduced due to potential negative alcohol related health impacts resulting from a proliferation of social facilities and the retention of public houses.</p> <p><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>There is potential for these policies to work in synergy with the housing policies to contribute towards the liveability aspects of this objective, resulting in a significant positive effect.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	<p><u>Uncertainties</u></p> <p>None identified.</p>					
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><u>Likely Significant Effects</u></p> <p>Policy S.CF1 and Policy D.CF3 direct proposals for new facilities and services to accessible locations including Town Centres and areas in accessible locations. As such the policies would link new community facility development with sustainable transport provision and could encourage sustainable modal shifts when accessing these facilities and services, resulting in a major positive effect on this SA objective.</p> <p>There is no clear relationship between the other policies and this SA objective.</p> <p><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 S.CF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new community facilities, including education facilities. This would directly contribute to this SA objective through enhancing education opportunities and facilities and supporting the Council in continuing to discharge their statutory education duties.</p> <p>Policy D.CF2 includes criteria for the extension of existing schools and a significant positive effect is identified.</p> <p>Policy D.CF3 provides support for the delivery of an expanded network of pre-school, school, further and higher education facilities and upgraded Ideas Stores (see supporting text to the policy). This would directly contribute to this SA objective through enhancing a range of education opportunities and facilities, which could also increase opportunities for adult learners to retrain or upskill.</p> <p>There is no clear relationship between Policy D.CF4 and this SA objective.</p> <p><u>Mitigation</u></p> <p>None required.</p>	++	++	++	~	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	<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>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 D.CF3 would directly contribute to this SA objective by increasing opportunities to access adult, further and higher education facilities and therefore improve skill levels, resulting in reduced worklessness and improved access to employment.</p> <p><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>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>D.CF2 sets out criteria to protect existing community facilities whilst policy D.CF3 requires proposals to demonstrate a local need for the facility. This would directly contribute to this SA objective through protecting the viability of existing facilities and thereby potentially supporting a range of existing organisations and associated employment.</p> <p><u>Mitigation</u></p> <p>None required.</p> <p><u>Assumptions</u></p> <p>None identified.</p>	+	+	+	+	++

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	<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>Policy S.CF1 and Policy D.CF3 direct community, cultural and social facilities to locations within the Town Centre hierarchy. This would enhance the vitality of Town Centres and therefore directly contribute to this SA objective (a significant positive effect).</p> <p>Policy D.CF2 will contribute to this objective as it supports the retention of existing facilities, which could include those in town centre locations and a minor positive effect is identified on this basis.</p> <p><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 CF 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
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 D.CF2 sets out criteria to protect existing community facilities (which could include an element of open space) and also requires that extensions to schools retain or increase the current level of child space. Policy D.CF3 could result in the creation of new open space associated with new schools, minor positive effects are identified on this basis.</p>	~	+	+	~	+

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	<p>There is no clear relationship between the other policies 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>					
12. Climate change: Ensure the Local Plan incorporates mitigation and adaptation measures to reduce and respond to the impacts of climate change.	<p><u>Likely Significant Effects</u> Policies S.CF1 and D.CF3 direct proposals for new facilities and services to accessible locations, which could encourage sustainable modal shifts and thus contribute to the climate change SA objective.</p> <p>There is no clear relationship between the other policies and this SA objective.</p> <p><u>Mitigation</u> None identified</p> <p><u>Assumptions</u> None identified.</p> <p><u>Uncertainties</u> None identified.</p>	++	~	++	~	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><u>Likely Significant Effects</u> There is no clear relationship between these policies and this SA objective.</p> <p><u>Mitigation</u> None required.</p> <p><u>Assumptions</u> None identified.</p> <p><u>Uncertainties</u> None identified.</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p>Likely Significant Effects</p> <p>Policies S.CF1 and D.CF3 direct proposals for new facilities and services to accessible locations, which could encourage sustainable modal shifts and thus contribute to the achievement of this objective.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	~	++	~	++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p>Likely Significant Effects</p> <p>Policies S.CF1 and D. CF3 provide the opportunity to introduce new open spaces, e.g. associated with schools that could help mitigate flood risk and a minor positive effect is identified against this objective.</p> <p>Mitigation</p> <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>There is no clear relationship between these policies and this SA objective.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p>	~	~	~	~	0

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	
	None identified.					

SA Objective	Commentary	Draft Policies				Cumulative Effect of the Draft Policies
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><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, including the temporary use of vacant developable sites. The policies would therefore facilitate increased use of open spaces by a range of population groups, which could stimulate increased participation in recreational activities, thereby reducing social exclusion and promoting integration. For these reasons the policies would contribute directly to this SA objective.</p> <p><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
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><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 by ensuring that new housing benefits from well-located open space, resulting in a significant positive effect. Policy D.OWS4 also provide criteria relating to the provision of residential moorings.</p> <p><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
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><u>Likely Significant Effects</u></p> <p>Policies S.OWS2 and D.OWS4 require development proposals to protect navigation and water transport uses from adverse impacts, as well as to enhance the use of water spaces and the network of water spaces. This would safeguard and could also enhance the use of waterways for passenger and freight transport, which would increase transport efficiency and encourage in sustainable modal shifts. As such these two policies would directly contribute to this SA objective resulting in a significant positive effect.</p> <p>Other policies will help ensure that open spaces contribute to the Green Grid and provide well connected open space that will enable walking and cycling. As such, the policies would directly contribute to this SA objective resulting in significant positive effects.</p> <p><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 and water spaces can provide suitable environments for some learning activities, so their enhancement and protection through these policies has the potential to deliver beneficial outcomes in relation to this SA objective, resulting in a minor positive effect.</p> <p><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
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><u>Likely Significant Effects</u></p> <p>The requirement within Policies S.OWS2 and D.OWS4 to protect navigation and not to compromise other water uses would safeguard existing economic activity and therefore also employment within existing water spaces and the network of water spaces, in particular ensuring the continuation of water transport activities. However, these policies largely set out safeguards for existing water space uses rather than encouraging economic growth or new employment within them; therefore there is no significant relationship between these policies and this SA objective.</p> <p><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 Policies S.OWS2 and D.OWS4 for development proposals to protect navigation and not to compromise other water uses would safeguard existing economic activity and therefore also employment within existing water spaces and the network of water spaces, in particular ensuring the continuation of water transport activities. However, these policies largely set out safeguards for existing water space uses rather than encouraging economic growth or new employment within them; therefore there is no significant relationship between these policies and this SA objective.</p> <p><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
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><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
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><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 D.OWS4 requires development to demonstrate that it will not contribute to flood risk.</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
		S.OWS1: Creating a network of open spaces	S.OWS2: Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><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 S.OWS2, D.OWS3 and D.OWS4 require development proposals to enhance biodiversity. All of the policies would therefore directly contribute to this SA objective through conserving, enhancing and improving connectivity between a range of habitats, facilitating biodiversity within new developments, improving access to nature and safeguarding protected species (through habitat protection and enhancement).</p> <p><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
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><u>Likely Significant Effects</u></p> <p>Policy S.OWS1 and Policy D.OWS3 require development proposals to protect, develop and enhance the quality of a range of open spaces and green corridors. This would directly help to improve soil quality and indirectly could help to improve air quality (through the aerobic effects of additional hedge and tree planting), resulting in a positive effect on this SA objective. In addition the support for the temporary greening of vacant land within Policy D.OWS3 would improve the appearance of the Borough and could stimulate interest in either bringing the land back into economically productive use or long term use for community benefit; thereby optimising resource usage and contributing to this SA objective.</p> <p>Policy S.OWS2 and D.OWS4 include the requirement to enhance the ecological and biodiversity value of water and will therefore make a significant positive contribution to the achievement of this objective.</p> <p><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
		S.OWS1: Creating a network of open spaces	S.OWS2 Enhancing the network of water spaces	D.OWS3: Open space and green grid networks	D.OWS4: Water spaces	
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><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 D.OWS4 requires development proposals in or adjacent to the borough's water spaces it will not increase in flood risk. This would directly contribute to this SA objective through reducing the exposure of new developments to fluvial flood risks.</p> <p><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 required by S.OWS1 and Policy D.OWS3 would help to improve soil quality, whilst the support provided by D.OWS4 for temporary greening would improve the appearance and longer term development potential of vacant and brownfield sites. As such these policies would directly contribute to this SA objective.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p><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
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5: Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policy D.ES3 require all developments to protect and enhance the natural environment, and Policy S.ES1 specifically identifies the need to improve opportunities to experience nature, in particular in deficient areas. This could prioritise environmental improvements in deprived areas (or areas lacking open spaces) and increase access to environmental assets (e.g. open spaces) for a range of demographic groups, which would help to tackle social exclusion and promote social cohesion and integration. As such the policy makes a significant positive contribution to this SA objective.</p> <p>Policy D.ES2 requires all development proposals to meet or exceed the 'Air Quality Neutral' standard, which ensures all neighbourhoods receive the same minimum treatment when considering air quality issues, regardless of their social or demographic characteristics. This could prevent environmental justice related concerns from arising, resulting in an indirect positive effect on this SA objective.</p> <p>Criterion 3b of Policy D.ES7 and the supporting text to it identify the potential for development to support the Decentralised Energy Network (DEN). If this subsequently results in the deployment of decentralised energy systems in residential developments, this could reduce the exposure of future residents to market prices and enable the provision of subsidised energy for vulnerable groups. Consequently this policy has the potential to indirectly reduce fuel poverty and therefore contribute to this SA objective. Similarly, measures to address water consumption could help address water poverty, although a minor positive effect is identified in this instance.</p> <p>Policies D.ES9 and D.ES10 make a minor positive contribution as they seek to ensure that all communities enjoy a comfortable living environment.</p> <p>There is no clear relationship between policies D.ES4, D.ES5 and D.ES8 and this SA objective.</p> <p>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>Policy S.ES1 identifies the need to improve opportunities to experience nature, in particular in deficient areas, as well as a requirement for all development proposals to protect and enhance the quality of the natural environment. This could result in development proposals providing new open space provision, providing improved access to and/or enhancing the quality of existing open spaces, improving the appearance of localities, and upgrading public realm, all of which would make a significant positive contribution to this SA objective.</p>	++	++	+	+	+	~	~	~	++	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5: Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>Policy D.ES2 seeks to secure air quality neutral development, contributing to a high quality public realm and reducing the impacts of pollution on the public realm, a significant positive contribution to this SA objective.</p> <p>Policy D.ES3 relates to the protection and enhancement of biodiversity and a minor positive effect in relation to liveability is identified as this will also contribute to liveable neighbourhoods.</p> <p>Policy D.ES4 sets out a pro-active approach to flood risk management which promote liveable and safe areas.</p> <p>Policy D.ES5 provides the opportunity to provide multi-functional open spaces and a minor positive effect is identified on this basis.</p> <p>Policy D.ES9 directly contributes to this SA objective through safeguarding noise sensitive receptors from adverse noise impacts resulting from development proposals. A significant positive effect is therefore anticipated.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p>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>Policy S.ES1 identifies the need through biodiversity protection and enhancement to improve opportunities to experience nature, in particular in biodiversity deficient areas, which could be beneficial to mental and physical health. It also identifies the need to mitigate the adverse effects of contaminated land on human health. The policy also requires development to contribute towards achievement of the Borough's Air Quality Action Plan. These criterion would enhance open space provision, thereby encouraging increased recreational activity with associated positive health outcomes, as well as reducing existing health risks from contamination. As such the policy directly contributes to this SA objective.</p> <p>Policy D.ES2 sets out criteria to ensure that development proposals safeguard air quality and, through design, reduce exposure to air pollution. This would protect the physical health of both users of a development proposal and, in the case of developments with wider potential air quality effects, the wider public, resulting in a significant positive effect in relation to this objective.</p> <p>Policy D.ES3 sets out criteria to ensure that development proposals protect and enhance biodiversity interests. This could indirectly enhance open space provision and result in other environmental improvements with consequential indirect positive health and wellbeing impacts, including through increased</p>	++	++	++	+	+	~	~	++	++	++	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>active travel and recreational activities. As such the policy directly contributes to this SA objective.</p> <p>Policy S.ES1 and Policies D.ES4 and 5 set out a proactive approach to flood risk management which is likely to reduce flood risks and associated fears, whilst restricting development in flood risk areas that could be retained for recreational use. Therefore these policies could indirectly help to safeguard mental health and improve people's physical health and quality of life. A minor positive effect on this SA objective is identified for both D.ES4 and ES5.</p> <p>Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land and to control the storage and management of hazardous substances. These criteria seek to protect the environment, human health and general amenity from unacceptable impacts whilst enabling appropriate development proposals to proceed. Owing to the focus on protecting and enhancing human health the policy would directly contribute to this SA objective.</p> <p>Policy D.ES9 contributes to this SA objective through safeguarding noise sensitive receptors from adverse noise impacts (from development proposals), which would help to safeguard the physical and mental health and wellbeing of residents.</p> <p>Policy D.ES10 requires new development to avoid contributing to overheating which will have a significant positive effect on this objective.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None required.</p>											
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p>Likely Significant Effects</p> <p>There is no clear relationship between the Environmental Sustainability policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	~	~	~	~	~	~	~	~	~	0	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport,	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policy D.ES2 will contribute to this objective by requiring development to deliver air quality neutral development and, in the case of Policy SES1 contribute to the objectives of the Borough's Air Quality Action Plan.</p>	++	++	~	+	+	~	~	~	~	+	

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies	
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5: Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating		
	Uncertainties None identified.												
9. Town Centres: Promote diverse and economically thriving town centres.	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policy D.ES2 will contribute to this objective by requiring development to deliver air quality neutral development and, in the case of Policy S.ES1 contribute to the objectives of the Borough's Air Quality Action Plan. This will help maintain the attractiveness of town centres.</p> <p>Policies D.ES4 and 5 relate to flood risk and could contribute to this objective by helping to avoid flood risk in town centres.</p> <p>Policies D.ES9 and D.ES10 seek to avoid noise pollution and overheating. They will help achieve this objective by encouraging an attractive built environment that will help maintain the vitality of town centres.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties 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>By ensuring that development proposals adequately mitigate predicted environmental and amenity impacts and by proactively managing flood risk, these policies would ensure that natural and cultural heritage assets, including those which contribute to landscapes/townscapes, are protected from adverse development impacts and from the damaging effects of flooding. Therefore these policies would have a minor positive effect on this SA objective.</p> <p>Policy D.ES9 and D.ES10 seeks to protect the built environment and could also contribute to this objective by protecting heritage and cultural assets and their settings and people's ability to enjoy them.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties 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>Policy S.ES1 and Policy D.ES2 require all developments to protect and enhance the natural environment, and Spatial Policy S.ES1 specifically identifies the need to improve opportunities to experience nature, in particular in deficient areas. This could increase access to and improve the quality of open space provision, including through encouraging</p>	++	+	++	~	~	~	~	~	+	+	+	

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5: Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>new open space provision in areas of scarcity, which would have a significant positive effect on this SA objective.</p> <p>Policy D.ES2 requires that where open space would be located in an areas of sub-standard air quality that the position and design of the open space reduces exposure of future users to air pollution resulting in a positive effect on this SA objective.</p> <p>Policies D.ES9 and D.ES10 seek to avoid noise pollution and overheating. They will help achieve this objective by encouraging an attractive built environment that will help maintain the quality of existing open spaces.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties 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>These policies directly contribute to this SA objective through encouraging sustainable design, construction and use of new developments to reduce greenhouse gas emissions and adapt to climate change. In particular the policies seek to maximise energy efficiency, promote onsite energy generation from renewable energy sources, enable district heating, reduce water consumption, reduce flood risks and avoid overheating, which is likely to increase resilience and reduce vulnerability to climate change impacts.</p> <p>There is no relationship between this objective and policy D.ES9.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	++	++	++	++	++	++	++	++	~	++	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policy D.ES3 require all developments to protect and enhance biodiversity, and in doing so Policy S.ES1 requires developments to increase access to nature and to contribute to meeting the objectives of the latest Tower Hamlets Biodiversity Action Plan and the Thames River Basin Management Plan. The policies would ensure that development proposals protect, conserve and enhance a variety of habitats, designated sites, and protected species, and could also indirectly encourage greater habitat</p>	++	+	++	+	+	+	+	+	~	~	+

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5 Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
	<p>connectivity, resulting in major positive effects on this SA objective.</p> <p>Other Environmental Sustainability policies provide the opportunity to protect and where possible enhance environmental, including biodiversity, interests and amenity, resulting in indirect positive effects on this SA objective, for example D.ES5 relating to sustainable drainage could provide biodiversity benefits, depending on the methods used in a particular development.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>											
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p>Likely Significant Effects</p> <p>All policies make a significant contribution to the achievement of this objective. Specifically:</p> <p>Policies S,ES1 and D.ES2 set out criteria to ensure that development proposals safeguard air quality and, through design, reduce exposure to air pollution.</p> <p>Policies S,ES1 and D.ES3 require all developments to protect and enhance biodiversity, which would include protecting and improving soil resources.</p> <p>Policies S,ES1, D.ES4 and ES5 set out a pro-active approach to flood risk management, which would ensure that development proposals contribute to sustainable drainage practices and the protection of water quality.</p> <p>Policy D.ES6 requires development proposals to minimise water consumption and pressure on the combined sewer network, thereby ensuring the minimisation of water use.</p> <p>Policy D.ES7 will help reduce use of none renewable resources associated with energy generation.</p> <p>Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land subject in order to safeguard environmental and amenity interests. This provides a framework to allow the appropriate redevelopment of brownfield land.</p> <p>There is not relationship between Policies D.ES9 and D.ES10.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	++	++	++	++	++	++	++	++	~	~	++
15. Flood risk reduction and management: To minimise and	<p>Likely Significant Effects</p> <p>Policy S.ES1 and Policies D.ES4 and 5 set out a pro-active approach to flood risk management, which directs</p>	++	~	~	++	++	+	~	~	~	~	++

SA Objective	Commentary	Draft Policies										Cumulative Effect of the Draft Policies
		Policy S.ES1: Protecting and enhancing our environment	D.ES2: Air quality	D.ES3: Urban greening and biodiversity	D.ES4: Flood risk	D.ES5: Sustainable drainage	D.ES6: Sustainable water management	D.ES7: A zero carbon borough	D.ES8: Contaminated land and development and storage of hazardous substances	D.ES9: Noise and vibration	D.ES10: Overheating	
manage the risk of flooding	<p>development away from flood risk areas and therefore minimises flood risks to people and property. Policy D.ES5 also sets out criteria to ensure surface run-off is kept within acceptable limits and encourages the use of SUDS. As such these policies directly contribute to this SA objective through requiring flood risk and drainage to be managed sustainably.</p> <p>The requirement within Policy D.ES6 for development proposals to minimise impacts on water supply and sewerage networks would indirectly contribute to this SA objective through reducing potential flood risks.</p> <p>There is no clear relationship between the other Environmental Sustainability policies and this SA objective.</p> <p>There is not relationship between Policies D.ES9 and D.ES10.</p> <p>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 S.ES1 sets the context for D.ES8 on contaminated land, making a minor positive contribution to this objective.</p> <p>Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land subject in order to safeguard environmental and amenity interests. This provides a framework to allow the appropriate redevelopment of brownfield land whilst reducing human health impacts arising from existing contaminated land, and therefore makes a significant positive contribution to this SA objective.</p> <p>There is no clear relationship between these the other Environmental Sustainability policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	+	~	~	~	~	~	~	++	~	~	+

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p>Likely Significant Effects</p> <p>There is no clear relationship between the policies and this SA objective.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None required.</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>S.MW1 will contribute to this objective by safeguarding existing waste management facilities and identifying suitable areas of search for new facilities.</p> <p>D.MW2 includes criteria to protect the amenity of existing uses where new waste facilities are proposed and a significant positive effect is identified.</p> <p>Policy D.MW3 will contribute to liveable neighbourhoods by ensuring that adequate waste management is in place at the development level and a minor positive effect is identified.</p> <p>Mitigation</p> <p>None identified.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>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>Policy S.MW1 safeguards existing sites for waste recycling and treatment capacity and identifies sites for new facilities, providing the basis for avoiding development proposals that would prejudice these uses and any associated health impacts.</p> <p>Policy D.MW2 identifies the need for new waste management proposals to be enclosed and to consider impacts on amenity, including emissions to air resulting in a positive effect.</p> <p>Policy D.MW3 will contribute to this objective by ensuring that provisions for managing waste are incorporated in developments.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None required.</p>	+	+	+	+
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p>Likely Significant Effects</p> <p>There is no clear relationship between the 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

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p>Likely Significant Effects</p> <p>Policy D.MW2 seeks to ensure that new waste management facilities do not result in adverse transport impacts, resulting in a minor positive effect against this objective.</p> <p>There is no clear relationship between other 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
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>Likely Significant Effects</p> <p>There is no clear relationship between these 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
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p>Likely Significant Effects</p> <p>S.MW1 seeks to safeguard existing waste management facilities and identifies areas of search for new ones this could contribute to employment in the Borough in the waste management sector resulting in a minor indirect effect.</p> <p>There is no clear relationship between the other 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
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p>Likely Significant Effects</p> <p>Policies S.MW1, D.MW2 and D.MW3 could contribute to employment in the Borough in the waste management sector resulting in an indirect positive effect on this objective. .</p> <p>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>There is no clear relationship between the policies and this SA objective.</p> <p>Mitigation</p> <p>None required.</p>	~	~	~	0

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
	<p>Assumptions None identified.</p> <p>Uncertainties 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 By directing waste management facilities to appropriate sites and ensuring that development proposals adequately mitigate predicted environmental and amenity impacts these policies would ensure that natural and cultural heritage assets, including those which contribute to landscapes/townscapes, are protected from adverse development impacts. Therefore these policies would have a minor positive effect on this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	+	+	+	+
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>Likely Significant Effects There is no clear relationship between the policies and this SA objective.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties 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>Likely Significant Effects These policies directly contribute to this SA objective by encouraging measures to minimise carbon emissions and maximise the use of lower carbon energy sources, the minimisation of waste generation, enabling waste segregation and recycling. A significant positive effect is anticipated.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	++	++	++	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p>Likely Significant Effects Policies S.MW1, D.MW2 and D.MW3 make a positive contribution to this objective by seeking to manage the environmental impacts of managing waste, including transport related factors that could impact on biodiversity.</p> <p>Mitigation None required.</p> <p>Assumptions None identified.</p> <p>Uncertainties None identified.</p>	+	+	~	+

SA Objective	Commentary	Draft Policies			Cumulative Effect of the Draft Policies
		S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p>Likely Significant Effects</p> <p>Policies S.MW1, D.MW2 and D.MW3 set out a strategy and development management criteria to provide waste management facilities, minimise residual waste generation from new developments and manage it thereby encouraging the growth of the circular economy.</p> <p>Mitigation</p> <p>None required.</p> <p>Assumptions</p> <p>None identified.</p> <p>Uncertainties</p> <p>None identified.</p>	++	++	++	++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p>Likely Significant Effects</p> <p>There is no clear relationship between the 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
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p>Likely Significant Effects</p> <p>There is no clear relationship between the other 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