

Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report

High Density Living Supplementary Planning Document

Statement of Reasons

December 2020



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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.
- 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).

- 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.

- **1. Equality:** reduce poverty and social exclusion and promote equality for all communities.
- **2. Liveability:** promote liveable, safe, high quality neighbourhoods with good quality public services.
- **3. Health and wellbeing:** improve the health and wellbeing of the population and reduce health inequalities.
- **4. Housing:** ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.
- **5. Transport and mobility:** create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.
- **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.
- **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.
- **9. Town centres:** promote diverse and economically thriving town centres.
- **10. Design and heritage:** enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.
- **11. Open space:** enhance and increase open spaces that are high quality, networked, and multi-functional.
- **12. Climate change:** ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.
- **13. Biodiversity:** protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.
- **14. Natural resources:** ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.
- **15. Flood risk reduction and management:** to minimise and manage the risk of flooding.
- **16. Contaminated land:** improve land quality and ensure mitigation of adverse effects of contaminated land on human health.

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.

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

- 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.

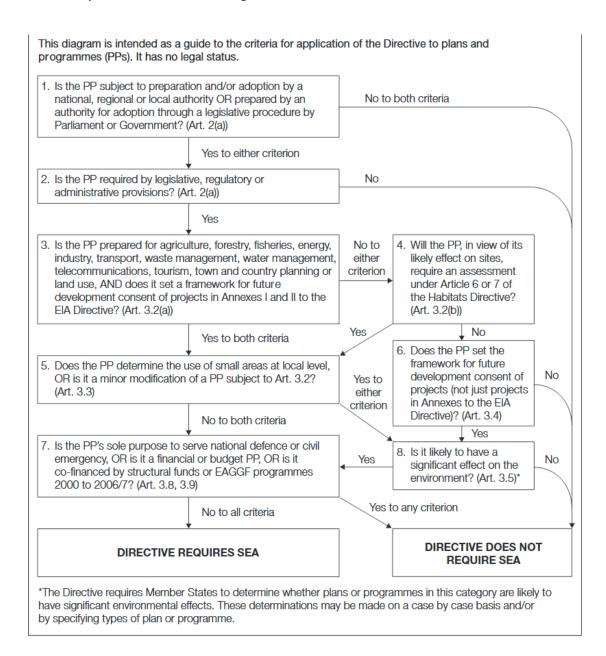


Figure 2: Application of the SEA Directive to plans and Programmes

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))	Υ	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 landuse. The Local Plan has been subject to full Sustainability Appraisal (including SEA).
Directive: (Article 5.2(a))	N	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

	ı	
		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	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.
		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.
		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

principle in the SA of the Local Plan.

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:

- 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

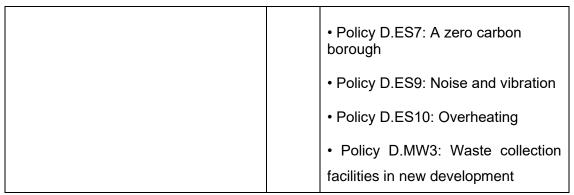


Table 3: SEA Screening of the High Density Living SPD

- 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	Comment
	determining likely significance of	Comment
	effects referred to in Article 3(5)	
The	characteristics of plans and progra	mmes, 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

	T	
		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	The Local Plan SA did not identify
lu)	<u>-</u>	any negative effects against the SA
	relevant to the plan or	, ,
	programme	Objectives for the policies relevant to
		housing and tall buildings design.
1e)	The relevance of the plan or	It is unlikely that there would be any
	programme for the	significant impact resulting from the
	implementation of Community	further guidance for High Density
	legislation on the environment	Living SPD.
	(e.g. plans and programmes	
	linked to waste management or	
	water protection).	
Cha	racteristics of the effects and of the	area likely to be affected, having
		•
rega	rd, in particular, to:	
rega 2a)		The SPD will cover the same period
	The probability, duration,	•
	The probability, duration, frequency and reversibility of the	of time as the Tower Hamlets Local
	The probability, duration,	of time as the Tower Hamlets Local Plan 2031. A Sustainability Appraisal
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2a)	The probability, duration, frequency and reversibility of the effects	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.
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2a)	The probability, duration, frequency and reversibility of the effects	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.

2c)	The trans-boundary nature of the	There will be no national trans										
,	effects	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	Human health and environmental										
	environment (e.g. due to	effects were assessed in the SA for										
	accidents)	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 f										
		the Local Plan will arise.										
2e)	The magnitude and spatial	The spatial extent of the SPD will be										
	extent of the effects	the same as the area covered in the										
	(geographical area and size of	Local Plan. The potential impacts of										
	the population likely to be	development proposals in this										
	affected)	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 value and vulnerability of the										
	the area likely to be affected due	area of the SPD have been										
	to: I. special natural	considered as part of the SA/SEA of the Local Plan. The										
	characteristics or cultural	intensiveness of the proposed use of										
	heritage, II. exceeded	land is a factor for which information										
	environmental quality standards	was available at the time of the										
	or limit values III. intensive land	SA/SEA assessment of the Local										
	use	Plan and no significant impacts were										
		identified in relation to this.										
2g)	The effects on areas or	The SPD is unlikely to result in										
	landscapes	significant effects on landscapes										
	which have a recognised	which have a recognised national,										
	national,	Community or international protection status.										
	Community or international	siaius.										
	protection status											
	ı -	l .										

6. Habitats Regulation and Assessment Screening

- 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.
- 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
- 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.
- 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.

- 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.
- 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

- 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 eny 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

Environmental Agency

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.

	P	lease d	lo not	hesitate to	contact	me with	າ any fເ	urther c	ueries.
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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

					ı	Oraft Po	licies						
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
Equality: Reduce poverty and social exclusion and promote equality for all communities.	Likely Significant Effects 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. 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. 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. Mittigation None required. Assumptions None identified. Uncertainties None identified.	+	+	~	~	~	+	+	+	·	~	?	+
Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	Likely Significant Effects 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. 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.	++	++	~	~	~	+	++	++	++	++	++	++

					I	Oraft Po	licies						
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	Policy D.DH2 also requires proposals to embed the principles of Secured by Design and to incorporate high quality public realm. These criteria would directly promote access to high quality open spaces, facilitate public realm improvements, and enhance both perceptions of and actual safety and security, resulting in a directive contribution to this SA objective. Policy D.DH6 contributes to this objective by requiring any proposals for tall buildings to deliver high quality private and communal open space and play areas for use by local residents, where residential uses are proposed. Tall Buildings outside of specified locations will need to demonstrate that they meet the criteria in part 3 of the policy, which include the delivery of significant open space. A minor positive effect is identified. Increased densities can impact on individual quality of life through increased disturbance and disruption. Policy D.DH7 'Density' cross references the density guidelines in the London Plan and requires that development will provide mitigation where higher densities are proposed. It also requires that the cumulative impacts of the proposed development have been considered and that development does not compromise the development potential of neighbouring sites. A significant positive effect is therefore anticipated. Policy D.DH8 'Amenity' encourages the protection and enhancement of attractive and useable amenity spaces and requires development proposals to avoid unacceptable nuisances and pollution impacts, which would directly contribute to this SA objective by mitigating potential impacts on amenity. It also seeks to ensure adequate levels of daylight and sunlight for new residential development and amenity spaces as well as protecting sunlighting and daylighting conditions of surrounding areas. A significant positive effect is therefore anticipated. Policies D.DH9 and D.DH10 require shopfronts, signage and advertising proposals to make a positive contribution to the public realm, which directly contributes to this												
	Mitigation												

		Draft Policies											
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	suggested that Strategic policy S.DH1 could highlight the need for o incorporate designing out crime principles. Policy D.DH2 red by Design.												
None identified. <u>Uncertainties</u>													
population and reduce health inequalities. principles, seekin accessible open a opportunities to p increase social in directly contribute positive effect on Policy S.DH1 also designed to be a microclimate are development miti Consequently the Policy D.DH2 req and easily access steps to improve encourage develonetworks, which or resulting in indire contributing to thi Policy D.DH6 ma tall buildings, whi communal open a Tall Building Zon.	uires development proposals to demonstrate good placemaking ig to ensure that developments are supported by publicly spaces that promote health and well-being. This would provide narticipate in recreational activities, encourage active travel and teractions, all of which would increase health and wellbeing and to this SA objective. As such the policy would have a significant this SA objective. To sets out criteria to ensure that proposed developments are daptable to the changing needs of users and that the effects on taken into account. The policy also seeks to ensure that gates the impacts of noise, overheating and air pollution. It is policy would have a significant positive effect on this SA objective. It is policy would have a significant positive effect on this SA objective. It is set to ensure that gates the impacts of noise, overheating and eigholity. This would opment proposals to embed active travel infrastructure within street could increase participation in, and the safety of, active travel, ct positive physical health outcomes and therefore indirectly	++	+	~	~	~	+	+	#	~	~	~	++

		Draft Policies											
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	exceed the design standards set out in Policy S.DH1 of the Local Plan and the Mayor of London's Housing SPG. Policy D.DH8 requires that development protects and where possible enhances or increases the extent of the amenity of new and existing surrounding residents and building occupants, as well as the amenity of the surrounding public realm. Therefore this policy would have a significant positive effect on this SA objective. There is no clear relationship between the other Design and Historic Environment policies and this SA objective. Mitigation None identified Assumptions None identified. Uncertainties None identified.												
Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	Likely Significant Effects Policy S.DH1, Policy and D.DH2 require development proposals to demonstrate good placemaking principles, high quality architecture, urban and landscape design, and to be integrated with their surroundings. This would ensure that residential developments meet appropriate design standards. As the focus of these policies is primarily the neighbourhood scale only a minor positive effect is predicted. There is no clear relationship between the other Design and Historic Environment policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties	+	+	~	~	~	~	~	3	~	~	٠	0

		Draft Policies											
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	None identified.												
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	Likely Significant Effects Policy S.DH1 requires development to deliver well connected and well integrated places, resulting in a minor positive effect on this SA objective. Policy D.DH2 requires development proposals to 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. Consequently the policy would have a significant positive effect on this SA objective. There is no clear relationship between the other Design and Historic Environment policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.	+	++	~	~	~	~	2	8	~	~	~	+
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.	Likely Significant Effects There is no clear relationship between these policies and this objective, albeit relevant policies would ensure that proposed new education infrastructure achieves high design standards and provides suitable learning environments. Mitigation None required. Assumptions None identified.	~	~	~	~	~	~	~	?	~	~	~	0

		Draft Policies											
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	Uncertainties None identified.												
Employment: Reduce worklessness and Increase employment opportunities for all residents	Likely Significant Effects There is no clear relationship between these policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.	ı	~	~	~	~	~	2	?	~	~	~	0
Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	Likely Significant Effects 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 socioeconomic renewal. The policies would therefore have a significant positive effect on this SA objective. D.DH6 directs Tall Building proposals to designated Tall Building Zones. This could help create clusters of firms that desire such a location, it is uncertain how relevant this would be as a locational factor so a minor positive effect has been recorded. Mitigation None required. Assumptions None identified.	#	++	~	~	~	+	2	2	~	~	~	+

					ı	Oraft Po	licies						
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	Uncertainties None identified.												
9. Town Centres:	Likely Significant Effects												
9. Town centres: Promote diverse and economically thriving town centres.	The policies identified seek to secure an attractive public realm, 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. D.DH9 and D.DH10 will make a minor positive contribution to this objective by helping to ensure that shop fronts and signage create attractive town centres. There is no clear relationship between other policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.	**	++	~	~	~	~	2	2	+	+	~	++
Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	Likely Significant Effects Policy D.DH1 has criterion that will help protect built heritage Policies D.DH3, D.DH4 and S.DH5 set out criteria to protect a range of recognised heritage assets, including strategic and locally important views. The other policies require development proposals to achieve high architectural, urban design and placemaking standards, positively contribute to townscape character and the public realm and adequately protect the amenity of adjacent sites and the public. Policy D.DH6 in includes a criterion to ensure that tall buildings do not adversely affecting heritage assets or strategic and local views and other historic skylines and their settings.	++	++	++	++	++	++	++	++	++	++	++	++

SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	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. Mitigation None identified. Assumptions None identified. Uncertainties None identified.												
Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	Likely Significant Effects Policy S.DH1 requires development proposals to provide a mix and range of publically accessible open spaces that promote biodiversity, health and well-being. 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. 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. There is no clear relationship between the other Design and Historic Environment policies and this SA objective. Mitigation None required. Assumptions None identified.	+	++	~	~	~	+	ı	3	~	~	ı	++

					ı	Oraft Po	licies						
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	Uncertainties None identified.												
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	Likely Significant Effects Policy S.DH1 requires development proposals to demonstrate good placemaking principles, including through the optimisation of energy and waste efficiency and measures to avoid overheating. As such the policy would contribute to and have a minor positive effect on this SA objective. Policy D.DH2 requires development proposals improve connectivity to public transport hubs, town centres, open spaces and social and community facilities. This would help ensure that streets and wider transport networks function efficiently, as well as encouraging active travel modes, reduced car travel and sustainable modal shifts. A minor positive effect is identified in relation to this objective as the resulting scale and significance of any reduction in carbon emissions is unknown. There is no clear relationship between the other Design and Historic Environment policies and this SA objective. Mittgation None required. Assumptions None identified. Uncertainties None identified.	+	+	~	~	+	~	~	~	~	~	~	+
 Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance. 	Likely Significant Effects Policy S.DH1 requires development proposals to provide open spaces that promote biodiversity. As such the policy would contribute to and have a significant positive effect on this SA objective. Policy D.DH6 sets out criteria to assess the acceptability of tall building proposals, including specifically a requirement to avoid adverse impacts on biodiversity. This would safeguard ecological interests, although taking account of the narrow scope	++	~	~	~	~	+	~	~	~	~	~	+

					ı	Draft Po	licies						
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	of this policy in relation to biodiversity, only a minor positive effect on this SA objective is predicted.												
	There is no clear relationship between the other Design and Historic Environment policies and this SA objective.												
	Mitigation												
	None required.												
	<u>Assumptions</u>												
	None identified.												
	<u>Uncertainties</u>												
	None identified.												
Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	Likely Significant Effects 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. 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. 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. There is no clear relationship between the other Design and Historic Environment policies and this SA objective. Mittigation None required. Assumptions None identified.	**	+	~	~	~	+		8	~	~	~	+

					I	Draft Po	licies						
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	Uncertainties None identified.												
15. Flood risk reduction and management: To minimise and manage the risk of flooding	Likely Significant Effects Policies S.DH1 and D.DH2 require development proposals to incorporate high-quality public and open spaces, which could reduce surface run-off and therefore reduce flood risks. Consequently these policies contribute to and would have a significant positive effect on this SA objective. Policy D.DH6 requires proposals for tall buildings to demonstrate that they will not adversely impact on water courses and their hydrology, it also requires the provision of open space which could help reduce suface run-off. There is no clear relationship between the other Design and Historic Environment policies and this SA objective. Mittigation None required. Assumptions None identified. Uncertainties None identified.	++	**	~	~	~	+	~	٠	~	~	~	++
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	Likely Significant Effects Policy D.DH8 safeguards human health by requiring development proposals to avoid unacceptable nuisances and pollution impacts. This would help to ensure that contaminated land is adequately and safely remediated, resulting in reduced adverse health risks. Consequently the policy would have a significant positive effect on this SA objective. There is no clear relationship between the other Design and Historic Environment policies and this SA objective.	~	~	~	~	~	~	~	++	~	~	~	0

					I	Oraft Po	licies						
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	Mitigation None required. Assumptions None identified. Uncertainties None identified.												

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
Equality: Reduce poverty and social exclusion and promote equality for all communities.	Likely Significant Effects These policies include the housing target to 2031, a strategic affordable housing target of 50%, delivery mechanisms to meet these targets, quality standards for residential development proposals and criteria for specialist housing provision. The policies would result in the provision of suitable housing of all types to meet identified needs, in particular by resisting development that would involve a net loss of residential floorspace, ensuring sufficient delivery of affordable housing, prioritising the regeneration of existing housing estates, directing new housing to accessible locations and providing specialist housing where required (which could indirectly increase the availability of and or reduce land value pressures on general purpose housing for local residents). Consequently, in line with this SA objective, all of these policies would help to reduce poverty, social exclusion and fuel poverty. Policy S.H1 includes measures to ensure that estate regeneration schemes meet housing need. Significant positive effects are anticipated from all policies in this Chapter. Mitigation None identified. Lincertainties There is a degree of uncertainty regarding the interaction of the new Starter Homes requirement with the Council's 50% strategic target for affordable housing delivery.	++	++	++	++	++	++	++	++

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
2. Liveability: Promote liveable, safe, high quality neighbourhood s with good quality services	Likely Significant Effects 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. 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. Policy D.H3 requires residential developments to protect or reprovide 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. Policy D.H7 directs houses in multiple occupation (HMO) to areas of high transport accessibility. Significant positive effects are anticipated for the identified policies. Mitigation None identified. Assumptions None identified.	++	++	++	++	++	++		**

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	Likely Significant Effects Policies S.H1, D.H4, D.H5 and D.H6 direct residential developments, including for specialist housing, to areas with high accessibility, suitable infrastructure provision and open space. 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 open space and public services, which could include health and leisure/community facilities. Policy D.H2 requires affordable housing to share the same level of amenities as private housing, which could contribute positively to health, e.g. in relation to issues associated with noise. Policy S.H1 includes measures to ensure that estate regeneration schemes meet housing need. Policy D.H7 seeks to ensure that HMOs do not impact on local amenity and that relevant standards, including space standards are complied with. Significant positive effects are anticipated from all policies in this Chapter. Mitigation None identified. Assumptions None identified. Uncertainties None identified.	++	++	++	++	++	++	++	**

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
4. Housing: Ensure that all residents have access to good quality, well- located, affordable housing that meets a range of needs and promotes liveability.	Likely Significant Effects 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). Significant positive effects are anticipated from all policies in this Chapter. Mitigation None identified. Assumptions None identified. Uncertainties 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.	++	++	++	++	++	++	++	++

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	Likely Significant Effects 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. 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	+	~	~	+	+	+	+	+

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
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.	 Likely Significant Effects The policies do not directly contribute to this SA objective. However: 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. There is no clear relationship between the other Housing policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified. 	+	4	~	~	+	+		+

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	Likely Significant Effects The policies do not directly contribute to this SA objective. However, Policies S.H1 and Policies H4, H5, H6 and H7 direct residential developments, including for specialist housing, to areas with high accessibility and suitable infrastructure provision. These policies would have an indirect minor positive effect on this SA objective through improving the physical accessibility of employment locations for residents within new housing. 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. Mitigation None identified.	+	~	~	+	+	+	+	+
	Assumptions None identified. Uncertainties None identified.								
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	Likely Significant Effects The provision of housing will help support economic growth across the Borough. Sustained levels of increased housebuilding would also directly increase construction related economic activity and employment in line with this SA objective. Providing new homes for local workers and local employers will also aid the attraction of the Borough and help contribute towards this objective. Mitigation None identified Assumptions None identified. Uncertainties None identified.	++	++	++	++	++	++	**	++

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
9. Town Centres: Promote diverse and economically thriving town centres.	Likely Significant Effects 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. There is no clear relationship between the other Housing policies and this SA objective. Mitigation None identified Assumptions None identified. Uncertainties None identified.	~	•	~	+	~	+	~	+

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	Likely Significant Effects 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. There is no clear relationship between the other Housing policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None required.	+	~	~	~	~	~	~	0

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	Likely Significant Effects 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. 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. There is no clear relationship between the other Housing policies and this SA objective. Mitigation None identified. Assumptions None identified. Uncertainties None required.	+	~	++	~	~	'	~	0

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	Likely Significant Effects 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). 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. As drafted there is no clear relationship between the other Housing policies and this SA objective. Mitigation None identified. Assumptions None identified. Uncertainties None identified.	+	~	~	+	~	+	+	+

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	Likely Significant Effects 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. There is no clear relationship between the other Housing policies and this SA objective. Mitigation None identified Assumptions None identified. Uncertainties None required.	+	~	+	~	~	~	~	+

				Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	Likely Significant Effects 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. There is no clear relationship between the other Housing policies and this SA objective. Mitigation None identified. Assumptions Potential effects in relation to air quality are highlighted for consideration in other policies, e.g. Policy S.ES2. Uncertainties None required.	+	~	~	+	~	+	~	+

		1		Dra	ft Policies				
SA Objective	Commentary	S.H1 Meeting housing needs	D.H2: Affordable housing	D.H3: Housing standards and quality	D.H4: Specialist housing	D.H5: Gypsy and traveller accommodat ion	D.H6: Student housing	D.H7: Housing with shared facilities	Cumulativ e Effect of the Draft Policies
15. Flood risk reduction and management: To minimise and manage the risk of flooding	Likely Significant Effects 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. There is no clear relationship between the other Housing policies and this SA objective. Mitigation None identified. Assumptions 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. Uncertainties None identified.	+	~	~	~	~	~	~	0
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	Likely Significant Effects 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. Mitigation None identified. Assumptions None identified. Uncertainties None identified.	+	+	+	+	+	+	+	+

				Draft Policies		
SA Objective	Commentary	S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	Likely Significant Effects 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. 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. 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. Policy D.CSF4 seeks to protect existing public houses from development pressures and will make a minor positive contribution to this objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.	++	+	+	+	++
Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	Likely Significant Effects 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. Mitigation None required. Assumptions None identified. Uncertainties None identified	++	++	++	++	++

				Draft Policies		
SA Objective	Commentary	S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
wellbeing: Improve the health and	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 circuit post to exist the state of the state o					
wellbeing of the population and reduce health inequalities.	significant positive effect is identified. 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.					
	Policy D.CF2 sets out criteria to safeguard existing community facilities (including health facilities), which will also directly contribute to this objective.					
	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.					
	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.	++	++	++	+	++
	<u>Mitigation</u>					
	None identified.					
	<u>Assumptions</u>					
	None identified.					
	<u>Uncertainties</u>					
	None identified.					
4. Housing: Ensure that all residents have access to good	Likely Significant Effects 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.					
quality, well- located,	Mitigation					
affordable housing that	None required.	++	++	++	++	++
meets a range of needs and	<u>Assumptions</u>					
promotes liveability.	None identified.					

				Draft Policies		
SA Objective	Commentary	S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
	<u>Uncertainties</u>					
	None identified.					
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	Likely Significant Effects 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. There is no clear relationship between the other policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.	++	~	++	~	++
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.	Likely Significant Effects 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. Policy D.CF2 includes criteria for the extension of existing schools and a significant positive effect is identified. 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. There is no clear relationship between Policy D.CF4 and this SA objective. Mitigation None required.	++	++	++	~	++

				Draft Policies		
SA Objective	Commentary	S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
	<u>Assumptions</u>					
1	None identified.					
<u> </u>	<u>Uncertainties</u>					
1	None identified.					
7. Employment: L	Likely Significant Effects					
worklessness and Increase employment	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.					
f	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.					
1	<u>Mitigation</u>	+	+	+	+	+
1	None required.					
1	<u>Assumptions</u>					
1	None identified.					
<u> </u>	<u>Uncertainties</u>					
1	None identified.					
	Likely Significant Effects					
local economic a	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).					
sizes.	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.	+	+	+	+	++
<u> </u>	<u>Mitigation</u>					
1	None required.					
	<u>Assumptions</u>					
1	None identified.					

				Draft Policies		
SA Objective	Commentary	S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
	<u>Uncertainties</u>					
	None identified.					
9. Town Centres: Promote diverse and economically thriving town centres.	Likely Significant Effects Policy S.CF1 and Policy D.CF3 direct community, cultural and social facilities to locations within the Town Centre hierarchy. This would enhance the vitality of Town Centres and therefore directly contribute to this SA objective (a significant positive effect). Policy D.CF2 will contribute to this objective as it supports the retention of existing facilities, which could include those in town centre locations and a minor positive effect is identified on this basis. Mitigation None identified. Assumptions None identified. Uncertainties None identified.	++	+	++	+	++
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	Likely Significant Effects As drafted there is no clear relationship between the CF policies and this SA objective. Mitigation None identified. Assumptions None identified. Uncertainties None identified.	~	~	~	~	0
Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	Likely Significant Effects 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.	~	+	+	~	+

				Draft Policies		
SA Objective	Commentary	S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
	There is no clear relationship between the other policies and this SA objective.					
	Mitigation					
	None identified.					
	<u>Assumptions</u>					
	None identified.					
	<u>Uncertainties</u>					
	None identified.					
12. Climate change: Ensure	Likely Significant Effects					
the Local Plan incorporates	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.					
mitigation and adaption	There is no clear relationship between the other policies and this SA objective.					
measures to reduce and	Mitigation					
respond to the impacts of	None identified	++	~	++	~	++
climate change.	Assumptions					
	None identified.					
	<u>Uncertainties</u>					
	None identified.					
13. Biodiversity:	Likely Significant Effects					
enhance	There is no clear relationship between these policies and this SA objective.					
biodiversity, natural habitats,	Mitigation					
water bodies and landscapes	None required.					
of importance.	<u>Assumptions</u>	~	~	~	~	0
	None identified.					
	<u>Uncertainties</u>					
	None identified.					
	l					

				Draft Policies		
SA Objective	Commentary	S.CF1: Supporting community facilities	D.CF2: Existing community facilities	D.CF3: New community facilities	Policy D.CF4: Public houses	Cumulative Effect of the Draft Policies
14. Natural Resources:	Likely Significant Effects					
Ensure sustainable use and protection	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.					
of natural	<u>Mitigation</u>					
resources, including water,	None identified.	++	~	++	~	++
land and air, and reduce	<u>Assumptions</u>					
waste	None identified.					
	Uncertainties					
	None identified.					
15. Flood risk	Likely Significant Effects					
reduction and management: To minimise	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.					
and manage the risk of	<u>Mitigation</u>					
flooding	None required.	+				
	<u>Assumptions</u>	T	~	T	~	т
	None identified.					
	<u>Uncertainties</u>					
	None identified.					
16. Contaminated	Likely Significant Effects					
Land: Improve land quality and	There is no clear relationship between these policies and this SA objective.					
ensure mitigation of	<u>Mitigation</u>					
adverse effects of contaminated	None identified.	~	~	~	~	0
land on human health.	<u>Assumptions</u>					
	None identified.					
	<u>Uncertainties</u>					

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

			Draft Poli			
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
Equality: Reduce poverty and social exclusion and promote equality for all communities.	Likely Significant Effects 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	++	++	++	++	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	Likely Significant Effects 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. Mitigation None identified. Assumptions None required. Uncertainties None required.	++	++	++	++	++

			Draft Poli			
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities. 3. Health and wellbeing of the health and wellbeing of the population and reduce health inequalities.	Likely Significant Effects 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	++	++	++	++	++
4. Housing: Ensure that all residents have access to good quality, well- located, affordable housing that meets a range of needs and promotes liveability.	Likely Significant Effects 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	++	++	++	++	++

			Draft Poli			
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	Likely Significant Effects 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. 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	++	++	++	++	++
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.	Likely Significant Effects 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	+	+	+	+	+

			Draft Poli			
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	Likely Significant Effects 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	~	~	~	~	0
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	Likely Significant Effects 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	•	~	~	~	0

			Draft Poli	cies		
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
9. Town Centres: Promote diverse and economically thriving town centres.	Likely Significant Effects 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	+	+	+	+	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	Likely Significant Effects 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	++	++	++	++	++

			Draft Poli	cies		
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	Likely Significant Effects 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). Mitigation None required. Assumptions None identified/ Uncertainties None required.	++	++	++	++	++
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	Likely Significant Effects 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. Policy D.OWS4 requires development to demonstrate that it will not contribute to flood risk. Mitigation None required. Assumptions None identified. Uncertainties None identified.	+	+	+	++	+

			Draft Poli	cies		
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	Likely Significant Effects 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). Mitigation None required. Assumptions None identified. Uncertainties None identified.	++	++	++	++	++

			Draft Poli	cies		
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	Likely Significant Effects 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. 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. Mitigation None required. Assumptions None required. Uncertainties None required.	++	++	++	++	++

			Draft Poli	cies		
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
15. Flood risk reduction and management: To minimise and manage the risk of flooding	Likely Significant Effects 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. 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. Mitigation None required. Assumptions None identified. Uncertainties None identified.	+	+	+	++	+
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	Likely Significant Effects 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. There is no clear relationship between other policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.	++	~	++	~	++

		Draft Policies	0.500									
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
Equality: Reduce poverty and social	Likely Significant Effects											
exclusion and promote equality for all communities.	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.											
	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.											
	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.	++	+	**	~	~		+	~	+	+	+
	Policies D.ES9 and D. ES10 make a minor positive contribution as they seek to ensure that all communities enjoy a comfortable living environment. There is no clear relationship between policies D.ES4,											
	D.ES5 and D.ES8 and this SA objective. Mitigation											
	None identified,											
	Assumptions											
	None required.											
	Uncertainties											
	None identified.											
Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	Likely Significant Effects 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.											

		Draft Policies										
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	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.											
	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.											
	Policy D.ES4 sets out a pro-active approach to flood risk management which promote liveable and safe areas.											
	Policy D.ES5 provides the opportunity to provide multi- functional open spaces and a minor positive effect is identified on this basis.											
	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.											
	There is no clear relationship between the other Environmental Sustainability policies and this SA objective.											
	Mitigation											
	None identified.											
	<u>Assumptions</u>											
	None identified.											
	<u>Uncertainties</u>											
	None identified.											
3. Health and	Likely Significant Effects											
wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	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. 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. 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											

		Draft Policies										
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	active travel and recreational activities. As such the policy directly contributes to this SA objective. 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. 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. 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. Policy D.ES10 requires new development to avoid contributing to overheating which will have a significant positive effect on this objective. There is no clear relationship between other policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None required.											
Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	Likely Significant Effects There is no clear relationship between the Environmental Sustainability policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.	~	~	~	~	~	~	~	~	~	~	0
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport,	Likely Significant Effects 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.	++	++	~	+	+	~	~	~	~	~	+

		Draft Policies										
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
cycling and walking.	Measures to reduce flood risk in D.ES4 and D.ES5, including surface water flooding could contribute to this objective, to create a safe and sustainable network resulting in a minor positive effect for both policies. There is no clear relationship between other policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.											
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.	Likely Significant Effects There is no clear relationship between these policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.	~	~	~	~	~	~	~	~	~	~	0
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	Likely Significant Effects There is no clear relationship between the policies and this SA objective. Mitigation None required. Assumptions None identified. Uncertainties None identified.	~	~	~	~	~	~	*	ł	~	~	0
Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	Likely Significant Effects All policies make an indirect contribution to this objective by seeking to enhance the environmental quality of the area, which will be important in retaining and attracting investment. Policy D.ES9 requires proposals for noise-sensitive uses that are proposed near existing noise-generating cultural and entertainment venues to demonstrate how conflict with existing uses will be avoided. A minor positive effect is identified recognising the contribution that such venues make to the local economy and the economy of London as a whole. Mittigation None required. Assumptions None identified.	+	+	+	+	+	+	•	+	+	+	+

		Draft Policies										
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	<u>Uncertainties</u>											
	None identified.											
9. Town Centres: Promote diverse and economically thriving town centres.	Likely Significant Effects Policy S.ES1 and Policy D.ES2 will contribute to this objective by requiring development to deliver air quality neutral development and, in the case of Policy S.ES1 contribute to the objectives of the Borough's Air Quality Action Plan. This will help maintain the attractiveness of town centres. Policies D.ES4 and 5 relate to flood risk and could contribute to this objective by helping to avoid flood risk in town centres. Policies D.ES9 and D.ES10 seek to avoid noise pollution and overheating. They will help achieve this objective by encouraging an attractive built environment that will help maintain the vitality of town centres. There is no clear relationship between other policies and this SA objective. Mitigation None required.	+	+	~	+	+	~	~	~	++	++	+
10. Design and Heritage: Enhance	Assumptions None identified. Uncertainties None identified. Likely Significant Effects											
and conserve heritage and cultural assets; distinctive character and an attractive built environment.	By ensuring that development proposals adequately mitigate predicted environmental and amenity impacts and by proactively managing flood risk, these policies would ensure that natural and cultural heritage assets, including those which contribute to landscapes/townscapes, are protected from adverse development impacts and from the damaging effects of flooding. Therefore these policies would have a minor positive effect on this SA objective. Policy D.ES9 and D.ES10 seeks to protect the built environment and could also contribute to this objective	+	+	+	+				·	++	**	
	by protecting heritage and cultural assets and their settings and people's ability to enjoy them. Mitigation None required. Assumptions None identified. Uncertainties None identified.											
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	Likely Significant Effects 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	++	+	++	~	~	~	~	~	+	+	+

		Draft Policies										
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	new open space provision in areas of scarcity, which would have a significant positive effect on this SA objective. 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. 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. There is no clear relationship between the other Environmental Sustainability policies and this SA objective. Mitigation											
	None required. Assumptions											
	None identified.											
	Uncertainties											
	None identified.											
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of dimate change.	Likely Significant Effects 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. There is no relationship between this objective and policy D.ES9. Mitigation None required. Assumptions None identified. Uncertainties None identified.	**	**	**	**	**	**	**	**	~	**	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	Likely Significant Effects 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	++	+	++	+	+	+	+	+	~	~	+

		Draft Policies										
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
	connectivity, resulting in major positive effects on this SA objective.											
	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.											
	<u>Mitigation</u>											
	None required.											
	<u>Assumptions</u>											
	None identified.											
	<u>Uncertainties</u>											
	None identified.											
14. Natural Resources: Ensure sustainable	<u>Likely Significant Effects</u>											
use and protection of natural	All policies make a significant contribution to the achievement of this objective. Specifically:											
resources, including water, land and air, and reduce waste	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.											
reduce waste	Policies S.ES1 and D.ES3 require all developments to protect and enhance biodiversity, which would include protecting and improving soil resources.											
	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.											
	Policy D.ES6 requires development proposals to minimise water consumption and pressure on the combined sewer network, thereby ensuring the minimisation of water use.	++	++	++	++	++		++	++	~	~	++
	Policy D.ES7 will help reduce use of none renewable resources associated with energy generation.											
	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.											
	There is not relationship between Policies D.ES9 and D.ES10.											
	<u>Mitigation</u>											
	None required.											
	<u>Assumptions</u>											
	None identified.											
	<u>Uncertainties</u>											
	None identified.											
15. Flood risk reduction and	<u>Likely Significant Effects</u>											
management: To minimise and	Policy S.ES1 and Policies D.ES4 and 5 set out a pro- active approach to flood risk management, which directs	++	~	~	++	++	+	~	~	~	~	++

		Draft Policies										
SA Objective	Commentary	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	Cumulative Effect of the Draft Policies
manage the risk of flooding	development away from flood risk areas and therefore minimises flood risks to people and property. Policy D.ESS 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.											
	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.											
	There is no clear relationship between the other Environmental Sustainability policies and this SA objective.											
	There is not relationship between Policies D.ES9 and D.ES10.											
	Mitigation											
	None required.											
	Assumptions											
	None identified.											
	<u>Uncertainties</u>											
	None identified.											
16. Contaminated	Likely Significant Effects											
Land: Improve land quality and ensure mitigation of adverse effects of	Policy S.ES1 sets the context for D.ES8 on contaminated land, making a minor positive contribution to this objective.											
contaminated land on human health.	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.		~									
	There is no clear relationship between these the other Environmental Sustainability policies and this SA objective.		~	~	~	~	~	~	**	~	~	
	<u>Mitigation</u>											
	None required.											
	Assumptions											
	None identified.											
	<u>Uncertainties</u>											
	None identified.											

SA Objective	Commentary		Draft Policies		Cumulative Effect of the
SA Objective	Commentary	S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	Draft Policies
1 Equality: Reduce	Likely Significant Effects				
poverty and social exclusion and promote	There is no clear relationship between the policies and this SA objective.				
equality for all communities.	<u>Mitigation</u>				
Communities.	None identified.				
	<u>Assumptions</u>	~	~	~	0
	None required.				
	<u>Uncertainties</u>				
	None identified.				
2. Liveability: Promote	Likely Significant Effects				
liveable, safe, high quality neighbourhoods with good quality	S.MW1 will contribute to this objective by safeguarding existing waste management facilities and identifying suitable areas of search for new facilities.				
services	D.MW2 includes criteria to protect the amenity of existing uses where new waste facilities are proposed and a significant positive effect is identified.				
	Policy D.MW3 will contribute to liveable neighbourhoods by ensuring that adequate waste management is in place at the development level and a minor positive effect is identified.				
	<u>Mitigation</u>	+	++	+	+
	None identified.				
	Assumptions				
	None identified.				
	<u>Uncertainties</u>				
	None identified.				
Health and wellbeing: Improve the health and	Likely Significant Effects				
wellbeing of the population and reduce	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.				
health inequalities.	Policy D.MW2 identifies the need for new waste management proposals to be enclosed and to consider impacts on amenity, including emissions to air resulting in a positive effect.				
	Policy D.MW3 will contribute to this objective by ensuring that provisions for managing waste are incorporated in developments.				
	<u>Mitigation</u>	+	+	+	+
	None required.				
	<u>Assumptions</u>				
	None identified.				
	<u>Uncertainties</u>				
	None required.				
Housing: Ensure that all residents have access to	<u>Likely Significant Effects</u>				
good quality, well-	There is no clear relationship between the policies and this SA objective.				
located, affordable housing that meets a	Mitigation				
range of needs and promotes liveability.	None required.				
promotes iiveability.	<u>Assumptions</u>	~	~	~	0
	None identified.				
	<u>Uncertainties</u>				
	None identified.				

SA Objective	Commentary		Draft Policies		Cumulative Effect of the
SA Objective	Commentary	S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	Draft Policies
5. Transport and mobility:	Likely Significant Effects				
Create accessible, safe and sustainable connections and	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.				
networks by road, public transport, cycling and walking.	There is no clear relationship between other policies and this SA objective. Mitigation				
	None required.	~	+	~	0
	Assumptions				
	None identified.				
	<u>Uncertainties</u>				
	None identified.				
6. Education: Increase and	<u>Likely Significant Effects</u>				
improve the provision of and access to childcare.	There is no clear relationship between these policies and this SA objective.				
education and training	Mitigation				
facilities and opportunities for all age	None required.				
groups and sectors of the local population.	Assumptions	~	~	~	0
are local population.	None identified.				
	<u>Uncertainties</u>				
	None identified.				
7. Employment: Reduce	Likely Significant Effects				
worklessness and Increase employment opportunities for all	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.				
residents	There is no clear relationship between the other policies and this SA objective.				
	<u>Mitigation</u>				
	None required.	+	~	~	0
	<u>Assumptions</u>				
	None identified.				
	<u>Uncertainties</u>				
	None identified.				
Economic Growth: Create and sustain local	Likely Significant Effects				
economic growth across a range of sectors and	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.				
business sizes.	Mitigation				
	None required.	+	+	+	+
	<u>Assumptions</u>				
	None identified.				
	<u>Uncertainties</u>				
	None identified.				
Town Centres: Promote diverse and	Likely Significant Effects				
economically thriving town centres.	There is no clear relationship between the policies and this SA objective.	~	~	~	0
town centres.	<u>Mitigation</u>				Ĭ
	None required.				

SA Objective	Commentary		Draft Policies		Cumulative Effect of the
3A Objective	Commentary	S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	Draft Policies
	Assumptions				
	None identified.				
	<u>Uncertainties</u>				
	None identified.				
Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built	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.				
environment.	<u>Mitigation</u>				
	None required.	+	+	+	+
	Assumptions				
	None identified.				
	<u>Uncertainties</u>				
	None identified.				
11. Open space: Enhance and increase open	Likely Significant Effects				
spaces that are high	There is no clear relationship between the policies and this SA objective.				
quality, networked and multi-functional.	<u>Mitigation</u>				
	None required.				
	<u>Assumptions</u>	~	~	~	0
	None identified.				
	<u>Uncertainties</u>				
	None identified.				
12. Climate change: Ensure the Local Plan	<u>Likely Significant Effects</u>				
incorporates mitigation and adaption measures to reduce and respond to the impacts of climate	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.				
change.	Mitigation Near agreement				
	None required. Assumptions	++	++	++	++
	None identified.				
	Uncertainties				
	None identified.				
13. Biodiversity: Protect and	Likely Significant Effects				
enhance biodiversity, natural habitats, water bodies and landscapes	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.				
of importance.	Mitigation				
	None required.	+	+	~	+
	Assumptions				
	None identified.				
	Uncertainties				
	None identified.				

SA Objective	Commenter		Draft Policies		Cumulative Effect of the
SA Objective	Commentary	S.MW1: Managing our waste	D.MW2: New and enhanced waste facilities	D.MW3: Waste collection facilities in new development	Draft Policies
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and	Likely Significant Effects 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.				
reduce waste	Mitigation				
	None required.	++	++	++	++
	Assumptions				
	None identified.				
	<u>Uncertainties</u>				
	None identified.				
 Flood risk reduction and management: To 	<u>Likely Significant Effects</u>				
minimise and manage the risk of flooding	There is no clear relationship between the policies and this SA objective.				
the risk of flooding	Mitigation				
	None required.	~	~	~	0
	Assumptions				Ů
	None identified.				
	<u>Uncertainties</u>				
	None identified.				
Contaminated Land: Improve land quality and	<u>Likely Significant Effects</u>				
ensure mitigation of adverse effects of	There is no clear relationship between the other policies and this SA objective.				
contaminated land on	Mitigation				
human health.	None required.	~	~	~	n
	<u>Assumptions</u>				U
	None identified.				
	<u>Uncertainties</u>				
	None identified.				