



TOWER HAMLETS



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London Borough of Tower Hamlets

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

Draft Report for Cabinet



October 2016

Amec Foster Wheeler Environment
& Infrastructure UK Limited



Report for

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Document revisions

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



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

Purpose of this report

Body text

The Draft Local Plan

Body text

Integrated Impact Assessment

Body text and diagram

Key Findings and Recommendations from the IIA

HIA

EqIA

HRA

The Assessment of the Vision and Objectives

The Assessment of Policies

The Assessment of Sites

Recommendations

Next Steps

Body text

How to Comment

Body text



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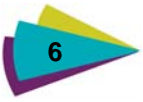
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1. Introduction

1.1 Background

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

1.2 The Draft Local Plan

- 1.2.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the regulatory requirements for developing and adopting a Local Plan. Before adoption, this involves preparing and consulting on a Draft Local Plan (Regulation 18), producing a Publication Draft Local Plan (Regulation 19), submitting the Local Plan to the Secretary of State for Communities and Local Government (Regulation 22) and subjecting the Local Plan to public examination (Regulation 24).
- 1.2.2 Once adopted the Draft Local Plan will replace the borough's current Local Plan (comprising the Core Strategy and Managing Development Document).
- 1.2.3 The new Local Plan will set out a vision, strategic priorities and a planning policy framework to guide and manage development in the borough to 2031, in line with the planning policy requirements set out by national government and the Greater London Authority.
- 1.2.4 The Local Plan is a critical tool for a planning authority to plan proactively and positively for development by focusing on the community needs and opportunities in relation to places, housing, economy, infrastructure, local services and other areas across the Borough. It also seeks to safeguard the environment, adapt to climate change and enhance the natural and historic environment.

Policy Context

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

National Planning Policy Framework (NPPF)

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

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

The NPPF and Sustainable Development

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

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

For decision-taking this means:

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

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

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

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

1.2.15 Paragraph 165 of the NPPF states that:

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

National Planning Practice Guidance

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

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

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

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

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

London Plan

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

London Legacy Development Corporation

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

Overview of the Draft Local Plan

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

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

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

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

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

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

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

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

1.3 Scope of the Integrated Impact Assessment (IIA)

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

Sustainability Appraisal (SA)

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

Strategic Environmental Assessment (SEA)

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

Health Impact Assessment (HIA)

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

Equalities Impact Assessment (EqIA)

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

1.4 Habitats Regulations Assessment

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

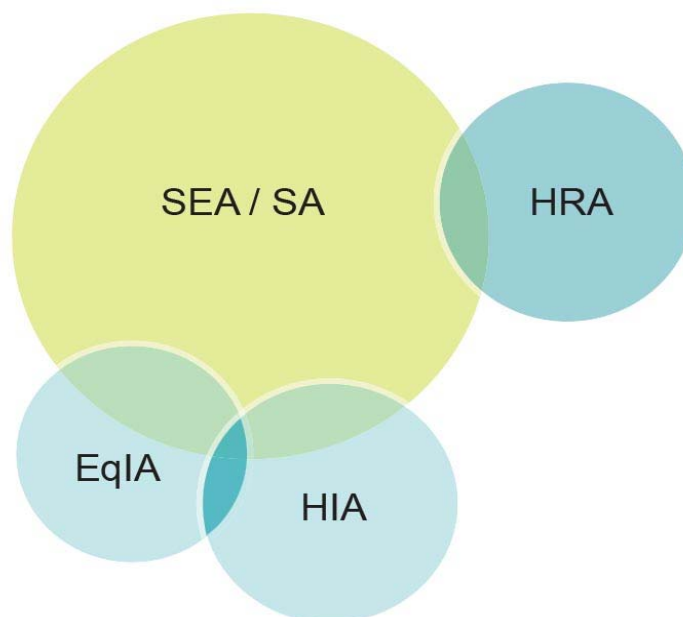
Integrating the Different forms of Assessment

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

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

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

Figure 1.1: Overlaps between the different forms of assessment



1.5 Purpose of this Report

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

1.6 How to Comment on this IIA Report

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

This Consultation: How to Give Us Your Views

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

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

By email: TBC

By post:

FREEPOST

Local Plan Consultation

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2. Approach to the IIA

2.1 Overview

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

2.2 Key Sustainability Issues

- 2.2.1 The key sustainability issues relevant to the Local Plan were identified in the Scoping Report and no additions to these were suggested in responses received to the scoping consultation.
- 2.2.2 The key sustainability issues reflect the challenges and priorities set out in the Community Plan, 2015. The underlying evidence base which informs these issues is contained in **Appendix C and D**.
- ▶ **A growing and changing population:** Tower Hamlets was the second fastest growing borough in England and Wales for the year 2013/14 (based on proportion). High growth is predicted to continue. The increasing population will also create changes in the age and ethnicity of residents. The largest percentage increase will be in the 'other' category, which will increase by 49% from 10,600 in 2014 to 15,769 in 2024, reflecting the increasing 'hyper diversity' of the borough. The biggest growing age group is of residents aged 35 to 64.
 - ▶ **Increasing income inequality and enduring deprivation:** Tower Hamlets is one of the most relatively deprived areas in London and England for multiple deprivations. Since 2007, the borough has improved in its overall relative position in the country. However the proportion of children and older persons living in income deprived families is significantly high. In addition income inequality is high and increasing.
 - ▶ **Relatively high unemployment and skills gap:** Tower Hamlets is a major location for employment in London, attracting a large daytime population of employees. However there is a major skills gap between local residents and the jobs available, reflected in a rising but lower than London average employment level. The median income in the borough is also lower than the UK and London average, reflecting low average skill levels. Fewer adult residents hold higher qualifications or any qualifications than the London average.
 - ▶ **Varying economic strengths of local town centres:** Current vacancy rates in the borough's town centres vary from around 1.25% to 15.5%. In addition levels of fast-food outlets, betting shops and payday loan stores are higher than ideal and have socio-economic and health implications. Town Centre uses are changing, with increasing cultural and social activities and a move away from traditional retail provision.
 - ▶ **Undersupply of housing:** The Council is in the process of producing a new Strategic Housing Market Assessment. Early indications suggest the Council will need to produce a large number of additional homes, of which over half will need to be affordable and about half will need to be family homes, reflecting a current lack of both tenures. In 2015, there was a waiting list of 19,810 households on the Council's housing waiting list.
 - ▶ **Overcrowding and lack of suitable homes:** Overcrowding is a major issue in the borough. According to the 2011 census, 32,235 households had too few rooms than they required. This represented 34.8 per cent of all households in the borough.
 - ▶ **Housing affordability gap:** Housing has been getting less affordable in the borough. This is reflected in both high sale and private rental values. Between 2010 and 2015 house prices rose by 46% from £341,900 to £499,060. The percentage of social housing stock is also reducing

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

- ▶ **Pressure on school places:** The expected housing and population growth in the borough increase the need for school places. Current forecast is that there will be about 9,000 more 4-16 year olds needing a school place over the next 10 years. Over the extra capacity already planned for, that means the equivalent of 2-3 new primary schools. The growth in primary numbers in previous years is now feeding through to secondary schools and the borough will require 2-3 new secondary schools over the next 10 years. However fluctuating birth rates across London, as well as increasing family mobility, means that this figure will need regular revision.
- ▶ **Lack of early years / childcare places:** In 2013 the Government introduced a new statutory duty on Councils to ensure adequate provision of 15 hours of childcare for disadvantaged two year olds. The borough's demographics mean that Tower Hamlets needs to provide the highest number of places. The Council is currently under providing by 1,398 places. In 2017 the duty will increase to 30 hours for disadvantaged 2 year olds and all 3 and 4 year olds, increasing the need to provide places.
- ▶ **High health inequalities:** Residents in the borough have lower life expectancies than average, but life expectancies are improving. There are significant health inequalities amongst residents in the borough. This is reflected in the variation of life expectancies between the most and least deprived residents. Tower Hamlets has higher than average premature death rates from cancer, respiratory disease and circulatory disease.
- ▶ **Poor children's health indicators:** Children in Tower Hamlets have amongst the highest levels of obesity nationally as well as poor oral health. Vitamin D deficiency is also a concern amongst mothers and children. Lower than average percentages of children achieving a good level of development at the end of reception year at school is also a concern.
- ▶ **Relatively high levels of crime and concern about crime:** Whilst total crime figures and most crime types are reducing in the borough, the rate of crime is still higher than that for London and England. In addition residents reported crime as the top concern in Tower Hamlets and public confidence with the police is only at 60%.
- ▶ **Pressure on transport capacity:** There is a need to increase the current and future capacity on trains, underground, overground, DLR, buses and local roads. 'Pinch points' around the borough need to be addressed, particularly those identified in the Isle of Dogs. There is a need to further encourage active modes of transport, particularly for local trips. There is a need to address road space conflicts between cyclists, pedestrians and motorists. This is particularly pertinent for 'pinch points' which have been identified through modelling.
- ▶ **Lack of open space:** Tower Hamlets has just over 232 hectares of open space which is 1.2 hectares per 1,000 residents. This is well below the National Playing Fields Standard of 2.4 hectares per 1,000. With increasing development creating new open space is a challenge.
- ▶ **Poor air quality:** Tower Hamlets produces the third highest level of total carbon dioxide emissions of the 33 Local Authorities in Greater London. Air pollution levels for the borough overall exceed targets set by the Government's Air Quality Strategy, 2007. Transport contributes to the majority of pollution in the borough. The close proximity of much of the borough to large arterial roads is of much concern, due to the impact on vulnerable groups such as children, the elderly and those with existing medical conditions. Air pollution has significant implications on health and life expectancy and is considered to be the second largest contributor to deaths after smoking.
- ▶ **Increasing rates of Fuel Poverty:** In 2013, 7.6% households in Tower Hamlets were estimated to be experiencing fuel poverty. This was an increase from the previous year, in which 7.3% of all households in the borough were estimated to be experiencing fuel poverty.
- ▶ **Rising Heat Island Effect:** London generates its own microclimate, known as the Urban Heat Island (UHI), which can result in the centre of London being up to 10°C warmer than the rural

areas around London. The 2003 summer heatwave resulted in about 600 excess deaths in London.¹ The hot temperatures in 2006 resulted in extremely high demands on London's power supply network and subsequent 'brown outs', due to the high cooling demand.

- ▶ **Low levels of biodiversity:** There are large areas in the borough which are considered to have deficient access to nature and biodiversity.
- ▶ **Low recycling rates:** The Council's recycling rates are below the London average, but rising steadily. The organic recycling rate is particularly low, which reflects the relatively small amount of garden waste produced, due to the nature of the housing stock. Whilst individual local authorities no longer have borough specific recycling targets, all local authorities are working towards 50% recycling rates (the National target).
- ▶ **Pressures on waste processing capacity:** Current safeguarded waste sites are both in areas transitioning away from industrial use and into residential use through their inclusion within the Poplar Riverside Housing Zone and the Fish Island area of the LLDC. The resulting increasing land values, as well as regional and local housing targets, creates pressure for alternative use for these sites.
- ▶ **Poor water quality:** For the 3 years between 2011/12 to 2013/14 the quality of the Lower Lea has remained unchanged. The quality of the water is reported as moderate, its chemical status is moderate and ecology is poor.
- ▶ **High level of flood risk,** especially in areas of expected development: A considerable proportion of the borough is within flood zones 2 and 3 (areas of highest risk). This includes those areas expected to accommodate high levels of development, including around the river Lea and Isle of Dogs. Over a third of Tower Hamlet's surface area is covered by buildings, roads and car. This high level of surface sealing exacerbates the risk of surface water level flooding. There are four critical drainage areas identified in Tower Hamlets Lower Lee Valley, Millenium Quarter and Crossharbour, Wood Wharf and Fish Island. Development offers the opportunity to reduce flood risk in these areas..
- ▶ **High noise complaints:** The Chartered Institute of Environmental Health calculates the rate of noise complaints per thousand of population for all London boroughs. In 2013/14 in Tower Hamlets this was 22%, amongst the highest in London and above the London average of 17.4%.
- ▶ **Heritage under pressure from development:** High levels of development and associated drivers of land prices and population growth, place pressure on heritage conservation. This pressure is compounded by the borough's location on the city fringe which has a mass of tall buildings. The demand for development could result in less consideration to the impact of appropriate scale of new buildings on the wider area. The Tower of London is a UNESCO world heritage site, a status which could be threatened unless its surroundings are protected.
- ▶ **Emerging design issues:** Increasing development is raising issues around sunlight, daylight and wind effects. In addition the borough may wish to undertake local view assessments to understand whether there are local views which should be protected, in addition to those protected by the London Plan. Finally the opportunity areas in the borough are located in areas of high archaeological importance.

2.2.3

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

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

2.3 Evolution of the Baseline

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

2.4 Links to other Plans and Programmes

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

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

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

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

2.6 Sustainability Appraisal of the Proposed Policies and Strategic Allocations

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

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

Table 2.1 Scoring System

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

2.7 Cumulative, Synergistic and Secondary Effects

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

2.8 Approach to the HIA

- 2.8.1 The London Healthy Urban Development Unit (HUDU) has developed a Rapid Health Impact Assessment Tool (June 2015). It is designed to rapidly assess the likely health impacts of development plans and proposals, including planning frameworks and masterplans for large areas, regeneration and estate renewal programmes and outline and detailed planning applications.

LHUDU advise that it should be used prospectively, at the earliest possible stage during plan preparation or prior to the submission of a planning application, to inform the design, layout and composition of a development proposal.

2.8.2 The assessment matrix identifies eleven topics or broad determinants:

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

2.8.3 Under each topic, Section 2 of the tool identifies examples of planning issues which are likely to influence health and wellbeing and the section also provides supporting information and references.

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

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

2.9 Approach to the EqIA

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

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

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

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

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

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

2.10 Approach to the HRA

- 2.10.1 Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the 'Habitats Regulations') states that if a land-use plan "*(a) is likely to have a significant effect on a European site² or a European offshore marine site³ (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site*" then the plan-making authority must "*...make an appropriate assessment of the implications for the site in view of that site's conservation objectives*" before the plan is given effect. The process by which Regulation 102 is met is known as Habitats Regulations Assessment (HRA)⁴. An HRA determines whether there will be any 'likely significant effects' (LSE) on any European site as a result of a plan's implementation (either on its own or 'in combination' with other plans or projects) and, if so, whether these effects will result in any adverse effects on the site's integrity. The Borough Council has a statutory duty to prepare the Local Plan and is therefore the competent authority for the HRA.
- 2.10.2 Regulation 102 essentially provides a test that the final plan must pass; there is no statutory requirement for HRA to be undertaken on draft plans or similar developmental stages (e.g. issues and options; preferred options) and so the report does not provide a formal conclusion to the HRA process. However, it is accepted best-practice for the HRA of strategic planning documents to be run as an iterative process alongside the plan development, and so at the Draft Plan stage potential mechanisms by which the Local Plan could affect European sites are identified and (if necessary) measures suggested to ensure significant effects do not occur.
- 2.10.3 The HRA of the Draft Plan uses the principles of 'screening' to allow the assessment stage to focus on those aspects that are most likely to have potentially significant or adverse effects on European sites, as well as shape the emerging plan. Screening is therefore used to 'screen-out' European sites and plan components from further assessment, if it is possible to determine that significant effects are unlikely (e.g. if sites or interest features are clearly not vulnerable (both exposed and

² Strictly, 'European sites' are: any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') apply; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Habitats Regulations are applied a matter of UK Government policy when considering development proposals that may affect them. "European site" is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

³ 'European offshore marine sites' are defined by Regulation 15 of *The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007* (as amended); these regulations cover waters over 12 nautical miles from the coast.

⁴ The term 'Appropriate Assessment' has been historically used to describe the process of assessment; however, the process is now more usually termed 'Habitats Regulations Assessment' (HRA), with the term 'Appropriate Assessment' limited to the specific stage within the process; see also Box 1.

sensitive) to the outcomes of a plan due to the absence of any reasonable impact pathways). For the LBTH plan, the screening process has been used on the plan 'as a whole'; on the European sites themselves; and on the key components of the plan (the policies and allocations). The screening takes account of measures that are intended for inclusion in the plan to avoid significant effects.

- 2.10.4 The current European Commission (EC) guidance⁵ suggests a four-stage process for HRA as shown in **Box 1**, although not all stages may be necessary.

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

- 2.10.5 This study considers potential effects on all European sites within 15km of the LBTH boundary, together with any additional sites that may be hydrologically linked to the plan's zone of influence. This is considered to be a suitably precautionary starting point for the assessment of the plan. . Often, however, sites or interest features within a study area can be excluded from further assessment at an early stage ('screened out') because the plan or project will self-evidently have either 'no effect' or 'no significant effect' on these sites (i.e. the interest features are not sensitive to likely effects of plan or project; or are not likely to be exposed to those effects due to the absence of any reasonable impact pathways).
- 2.10.6 The approach taken is to identify the current factors affecting them and their conservation objectives then to screen the policies in the Draft Local Plan to see if they would contribute to any existing problems. The HRA is attached as Appendix I of this report and the results are discussed in Section 3.7 of this report.

2.11 Working on the IIA

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

Who undertook the IIA and when

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

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

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

Technical difficulties and assumptions

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

3. Appraisal of Effects

3.1 Introduction

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

3.2 Sustainability Appraisal

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

Consideration of Reasonable Alternatives

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

Spatial Strategy

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

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

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

Policy and Strategic Site Options

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

Table 3.1: SA of Alternative Options for Spatial Planning

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

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

Vision and Objectives

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

Table 3.2 Local Plan Objectives and IIA Objectives

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

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

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

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

3.3 Sustainability Appraisal of the Draft Local Plan Policies

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

Sustainable Growth in Tower Hamlets

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

3.3.3 The scope of Policy SG1 is limited by changes in Government legislation. The Government has created a new approach for the setting of technical standards for new housing (Ministerial Statement, 25th March 2015). This means that local authorities only have the option of to set additional technical standards for housing in relation to access and water, so while the policy requires the use of standards, e.g. BREEAM for commercial development, it cannot do the same for housing related development. Policy H1 of the Local Plan references the use of the Housing Quality Mark for housing schemes on a voluntary basis.

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

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

3.3.6 In relation to SA objective 4 'Housing', Policy SG1 requires development proposals to be of a high quality design and also seeks to maximise the provision of accessible housing. This would directly contribute to this SA objective through firstly supporting increased housing provision in accessible locations and secondly ensuring that residential development proposals meet good design standards. Policy SG1 also highlights the need for development to consider a range of other factors, so significant positive effects are identified in relation to SA objective 10 'Design and Heritage' and SA objective 11 'Flood Risk.'

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

Design and Historic Environment

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

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

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

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

- 3.3.14 In relation to SA Objective 11 'Open Space' a significant positive effect is anticipated. Strategic Policy DH1 requires development proposals to demonstrate good placemaking principles, including through providing a range and mix of high-quality, publicly accessible green spaces. This would increase high quality open space provision, resulting in a major positive effect on this SA objective.
- 3.3.15 Strategic Policy DH2 requires development proposals to follow a street hierarchy which prioritises pedestrians and supports both the movements and place functions of streets. This would indirectly encourage development proposals to maximise links between open spaces and the built environment, as well as enhancing connectivity between open spaces. As such the policy could indirectly link and enhance open spaces, resulting in a minor positive effect on this SA objective. Policy DH5 sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks and include high quality public realm. This would directly contribute to this SA objective through increasing access to, enhancing the quality of and encouraging greater connectivity between open spaces. Policy DH8 encourages the creation of attractive and useable open spaces. Through the promotion of open space provision to meet identified needs the policy would directly contribute to and have a major positive effect on this SA objective.
- 3.3.16 A significant positive effect is anticipated in relation to SA objective 12 'Climate Change' and Policy DH10 which requires that developments are designed to avoid overheating.
- 3.3.17 Policies also make significant positive contributions in relation to biodiversity, flood risk, natural resources and contaminated land.
- 3.3.18 While positive contributions are anticipated a suggestion has been made in relation to Policies DH3 'Heritage and the Historic Environment and DH4 'World Heritage Sites.' This recommendation stems from a concern that the structure and content of the policies does not reflect the language and principles set out in the NPPF at paragraphs 132 to 134 and paragraph 138 in relation to the significance of designated heritage assets and their conservation, the concepts of substantial and less than substantial harm.

Housing

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

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

Economy and Jobs

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

- 3.3.32 Significant positive effects are also anticipated in relation to SA objective 5 'Transport' as policies seek to concentrate new employment and light industrial uses within highly accessible designated areas, which would support sustainable modal shifts and increase the efficiency of freight transport.
- 3.3.33 All policies make a significant positive contribution to SA objective 7 'Employment' and SA objective 8 'Economic Growth.' The policies encourage the development of employment floorspace and identify designated employment areas where specific types of employment uses should be directed to, whilst seeking to prevent the loss of employment space within designated areas and to ensure that new employment developments are compatible with existing and surrounding uses. As such all of these policies support the overall delivery of new employment opportunities, however they do not explicitly address issues regarding worklessness or barriers to employment within the local population, although the need to do this is identified in Policy SG1.
- 3.3.34 Policy EMP2 has a significant positive effect in relation to SA objective 7 'climate change' by to concentrating new employment and light industrial uses within highly accessible designated areas, which would support sustainable modal shifts, contribute to climate change mitigation.
- 3.3.35 No suggestions for changes to policies in this section have been identified.

Town Centres

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

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

Community, Culture and Social Facilities

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

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

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

Open Spaces and Water Spaces

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

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

Environmental Sustainability

- 3.3.66 This section of the Draft Local Plan contains a set of policies relating to natural resources and the natural environment and specific environmental topics.
- 3.3.67 Strategic Policy ES1 'Protect and Enhance our Environment' sets out principles for reducing the use of natural resources and enhancement of the natural environment. The other policies are:
- ▶ ES2 'Improving Air Quality';
 - ▶ ES3 'Urban Greening and Biodiversity';
 - ▶ ES4 'Reducing Flood Risk';
 - ▶ ES5 'Sustainable Waste management';
 - ▶ ES6a 'Achieving a Zero Carbon Borough';
 - ▶ ES6b 'Contaminated Land and Development and Storage of Hazardous Substances';
 - ▶ ES7 'Waste management'; and
 - ▶ ES8 'Waste management Capacity'.
- 3.3.68 Significant positive effects are anticipated in relation to SA objective 1 'Equality'. Strategic Policy ES1 and Policy ES3 requires all developments to protect and enhance the natural environment, and Strategic Policy ES1 specifically identifies the need to improve opportunities to experience nature, in particular in deficient areas. This could prioritise environmental improvements in deprived areas (or areas lacking open spaces) and increase access to environmental assets (e.g. open spaces) for a range of demographic groups, which would help to tackle social exclusion and promote social cohesion and integration. As such the policy directly contributes to this SA objective.
- 3.3.69 Significant positive effects are also anticipated for SA objective 2 'Liveability' and 3 'Health.' Policy ES2 seeks to secure air quality neutral development, contributing to a high quality public realm and reducing the impacts of pollution on the public realm, making a significant positive contribution to both SA objectives. Other policies also make a significant contribution to health, including those relating to urban greening (ES3) and contaminated land (ES6a).
- 3.3.70 Requiring development to achieve air quality neutral development will help achieve SA objective 5 'Transport and mobility' by encouraging modal shift.
- 3.3.71 All policies are assessed as having a significant positive effect in relating to SA objective 12 'Climate change mitigation and adaption. Policies directly contribute to this SA objective through encouraging sustainable design, construction and use of new developments to reduce greenhouse gas emissions and adapt to climate change. In particular the policies seek to maximise energy efficiency, promote onsite energy generation from renewable energy sources, minimise waste

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

- 3.3.72 Positive effects are anticipated in relation to SA objective 13 'Biodiversity'. Strategic Policy ES1 and Policy ES3 require all developments to protect and enhance biodiversity, and in doing so Strategic Policy ES1 requires developments to increase access to nature and to contribute to meeting the objectives of the latest Tower Hamlets Biodiversity Action Plan. The policies would ensure that development proposals protect, conserve and enhance a variety of habitats, designated sites, and protected species, and could also indirectly encourage greater habitat connectivity, resulting in major positive effects on this SA objective.
- 3.3.73 All policies are assessed as making a significant positive contribution to SA objective 14 on natural resource use.
- 3.3.74 Positive effects are anticipated for SA objective 14. Strategic Policy ES1 and Policy ES4 set out a pro-active approach to flood risk management, which directs development away from flood risk areas and therefore minimises flood risks to people and property. Policy ES4 also sets out criteria to ensure surface run-off is kept within acceptable limits, especially within Critical Drainage Areas, and encourage the use of SUDS. As such these policies directly contribute to this SA objective through requiring flood risk and drainage to be managed sustainably.
- 3.3.75 Positive effects are anticipated for SA objective 16 'Contaminated Land' as Policy ES6b sets out criteria to control development on potentially contaminated or unstable land subject in order to safeguard environmental and amenity interests. This provides a framework to allow the appropriate redevelopment of brownfield land whilst reducing human health impacts arising from existing contaminated land.
- 3.3.76 No suggestions for changes to policies in this section have been identified.

Transport and Connectivity

- 3.3.77 This section of the Draft Local Plan contains a set of policies relating to transport and connectivity, the policies set out the framework for future investment and the requirements for future development.
- 3.3.78 The section includes the following policies:
- ▶ Strategic Policy TRN1 'Sustainable Travel';
 - ▶ Policy TRN2 'Assessing the Impacts on the Transport Network';
 - ▶ Policy TRN3 'Parking and Permit – free'; and
 - ▶ Policy TRN4 'Sustainable Transportation of Freight'.
- 3.3.79 Strategic Policy TRN1 directs high trip generating development proposals to the town centre hierarchy and locations with high levels of public transport accessibility, which would indirectly help to reduce social exclusion and therefore contribute to SA objective 1 'Equality'.
- 3.3.80 All the policies in this section require development proposals to safeguard, development and enhance the Borough's transport network, in particular the public transport system, and Strategic Policy TRN1 also directs high trip generating developments to highly accessible locations. The policies would therefore make a significant positive contribution to SA objectives 3 'Liveability', 5 'Transport' and 8 'Economic growth' through enhancing access, in particular using public transport, to services, facilities and amenities, and through providing adequate transport infrastructure, as well as indirectly catalysing improvements to public realm around transport improvement projects.
- 3.3.81 Strategic Policy TRN1 makes a significant positive contribution to SA objective 3 'Health' through directing high trip generating developments to highly accessible location, which would both direct health, leisure and community facilities to highly accessible locations and further improve their accessibility, in particular using public transport. Policy TRN3 requires new developments to include adequate cycle parking provision and to contribute towards cycle docking stations. This

would increase cycling within the Borough, resulting in improved physical health through exercise and a direct significant positive effect on this SA objective.

- 3.3.82 All policies in this section make a significant positive contribution to SA Objective 12 'Climate Change' as they set out criteria to safeguard, development and enhance the public transport system. In particular Strategic Policy TRN1 commits to transport improvements, directs high trip generating developments to highly accessible locations and requires development proposals to be integrated with the public transport network, which would increase capacity and encourage sustainable modal shifts. All other Transport and Connectivity policies would similarly enhance the functioning of the Borough's public transport system and either directly or indirectly would concentrate development in accessible locations and encourage sustainable modal shifts.
- 3.3.83 In relation to SA objective 14 'Natural Resources' Policy TRN2 sets out criteria to prevent unacceptable adverse traffic impacts, which could otherwise increase local air pollution and cause/exacerbate health problems. Throughout these policies the priority afforded to public transport would encourage sustainable modal shifts which could improve air quality from traffic reduction, and air quality could also be improved through mitigation measures provided by the Council and developers of specific projects.
- 3.3.84 No suggestions for changes to policies in this section have been identified.

Planning Contributions

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

Are there any policy gaps?

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

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

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

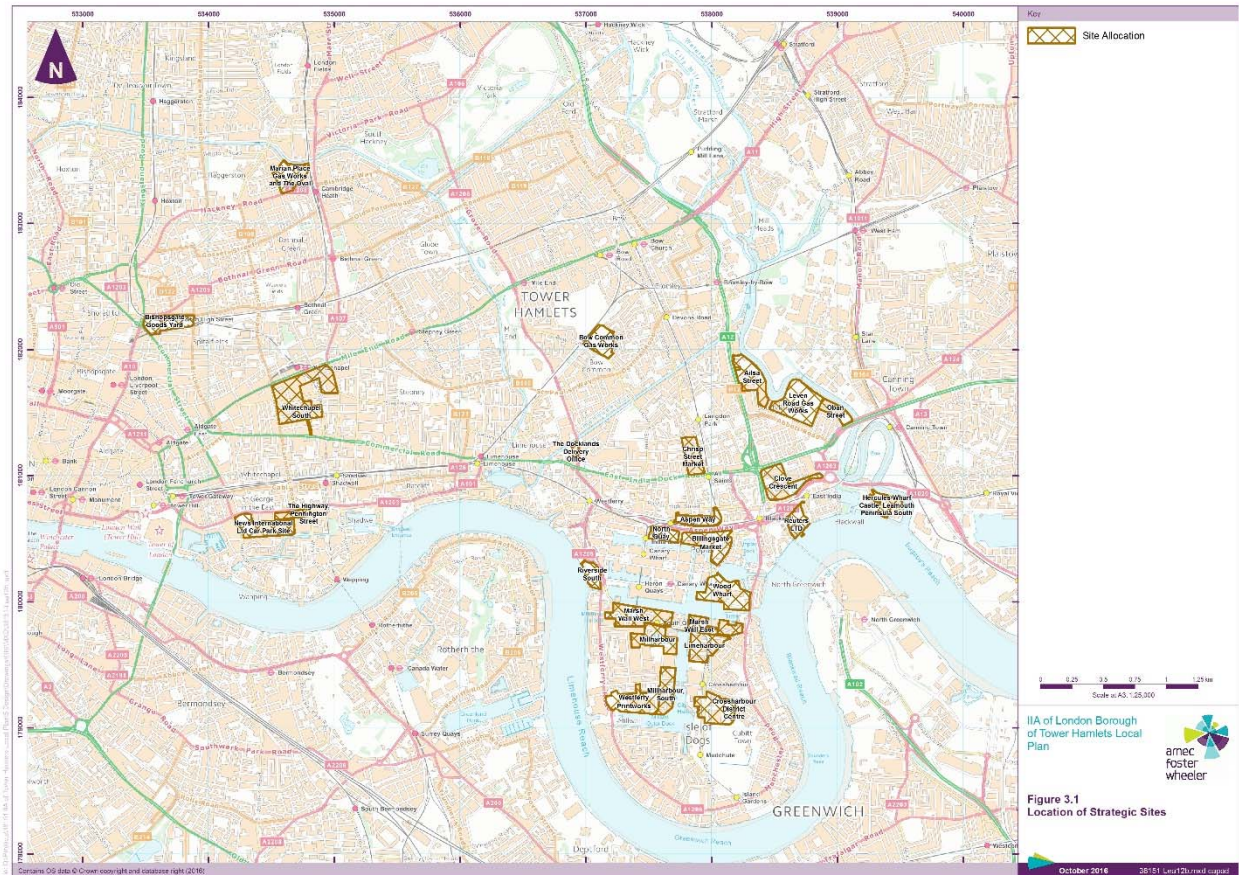
SA Objective	Relevant policies
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability	Strategic Policy H1 and Policies H2 to H6.
5. Transport and mobility: Create accessible, safe and sustainable connections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

Appraisal of Strategic Sites

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

- ▶ London Dock; and
- ▶ Wood Wharf.

Figure 3.1: Strategic Sites



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

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

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

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

Regeneration (SA objectives 1 and 16)

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

Proposed Land Uses (SA objectives 4 and 7)

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

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

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

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

Accessibility (SA objective 5)

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

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

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

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

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

Open Space (SA objective 11)

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

Flood Risk (SA objective 15)

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

Environmental Effects

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

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

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

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

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

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

3.4 Cumulative, Synergistic and Secondary Effects of Policies and Sites

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

Table 3.5 Potential Cumulative and Synergistic Effects from Draft Policies

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

SA Objectives	Draft Policy Groupings										Potential Cumulative and Synergistic Effects	
	Draft Sustainable Growth Policies	Draft Housing Policies	Draft Employment Policies	Draft Town Centre Policies	Draft Community Facilities Policies	Draft Design and Historic Environment Policies	Draft Transport Policies	Draft Environmental Sustainability Policies	Draft Open Space Policies	Draft Developer Contributions Policy		Strategic Sites
<p>4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.</p>	0	++	0	0	++	0	0	0	++	+	++	<p>There is potential for the draft community facilities and open space policies to work in synergy with the draft housing policies to contribute towards the liveability aspects of this SA objective, resulting in a significant positive effect. In particular, Strategic Policy CSF2 highlights that where no longer a need for a specific community facility, a site could be used for affordable housing provision, which would support the delivery of the affordable housing strategy detailed in policies H1 and H2.</p> <p>Strategic sites will help deliver new housing, contributing positively to this objective.</p>
<p>5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.</p>	+	+	++	++	++	+	++	+	++	+	?	<p>With the exception of the draft sustainable growth policies, which in overall terms do not have a major effect on this SA objective, all other draft policy groupings direct development proposals to highly accessible locations and require active travel infrastructure to be provided. Acting together this would ensure that new developments are both accessible and contribute to the wider development of more sustainable transport networks, resulting in a minor positive synergistic effect on this SA objective.</p> <p>Sites have been assessed on their PTAL rating, resulting in a range of scores. General policies in the Draft Local Plan require development to deliver improvements to transport infrastructure which strategic sites could help deliver but an uncertain effect has been identified at this stage.</p>
<p>6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.</p>	0	+	+	0	++	0	0	0	+	+	++	<p>Specific policies within the draft housing, community facilities and, to a lesser extent, open space policy groupings, contribute to this SA objective and could result in positive cumulative effects. In particular, policy H1 requires residential development proposals not to result in over-development and Strategic Policy CSF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new, social infrastructure. Acting together these policies would ensure that residential development proposals avoid increasing pressure on existing education infrastructure and where relevant also provide new facilities, which would increase access to education opportunities.</p> <p>A number of sites will help deliver new education facilities, contributing to this objective.</p>
<p>7. Employment: Reduce worklessness and increase employment opportunities for all residents</p>	0	+	++	+	+	0	0	0	0	+	?	<p>The draft housing, employment and town centre policy grouping all direct development proposals to highly accessible locations. The co-location of these land uses, in particular within town centres and at public transport hubs, would result in a positive synergistic effect on this SA objective as new employment</p>

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

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

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

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

3.5 Key Findings from the HIA

- 3.5.1 The HUDU Rapid HIA Assessment Matrix is at **Appendix I**.
- 3.5.2 Section 1 of the matrix relates to housing quality and design and promotes the use of the 'Lifetime Homes Standard and Building Regulation M4 (2)'. The Lifetime Homes standard is a voluntary set of 16 design criteria that provide a model for building accessible and adaptable homes. Building Regulation Requirement M4 (2) relates to accessible and adaptable dwellings, M4 (3) relates to wheelchair user dwellings. National Planning Practice Guidance (Reference ID 560007-20150327) states that it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4 (2) and / or M4 (3) based on their housing needs assessment and other available datasets.
- 3.5.3 The Government has created a new approach for the setting of technical standards for new housing (Ministerial Statement, 25th March 2015). This means that local authorities only have the option of to set additional technical standards for housing in relation to access and water.
- 3.5.4 The Mayor of London has also produced a set of housing standards, including minimum dimensions for rooms, which also encourage building accessible and adaptable homes. The standards also reference the Mayor's Housing Design Guide and Housing Supplementary Planning Guidance.
- 3.5.5 The following policies in the draft Local Plan are relevant to section 1 of the matrix:
- ▶ Policy H3 'Housing Standards and Quality' – which includes a requirement for 10% wheelchair accessible units across all tenures, consistent with London Plan Policy 3.8 B d).
 - ▶ Policy H4 relates to the protection and provision of specialist housing
 - ▶ Strategic Policy H1 encourages the use of the Home Quality Mark, which will be a voluntary scheme to replace the Code for Sustainable Homes. The Home Quality Mark, is more comprehensive in scope than the Lifetime Home Standards.
- Given the Ministerial Statement of 25th March 2015 the Council is limited to what it can require. The Local Plan must also be in conformity with the London Plan. The Draft Local Plan encourages the use of the Housing Quality Mark but can only do so on a voluntary basis. The reference to the Home Quality Mark could be in Policy SG1 itself, rather than just the supporting text as this would give it more prominence. Policies H3 and H4 also seek to secure and protect accessible and adaptable housing.
- 3.5.6 Section 2 of the matrix relates to 'Access to healthcare and other social infrastructure'. The London Borough of Tower Hamlets has developed a Growth model for understanding and monitoring population change and growth to plan for the timely and adequate provision of infrastructure and services for local people. Completion of the matrix highlights the need to keep the model under review as the Council and GLA work towards agreeing housing and employment targets to 2031. This will help ensure that positive outcomes are associated with criteria in the matrix relating to community facilities and infrastructure.
- 3.5.7 Section 3 of the matrix relates to 'Access to open space and nature'; Section 4 relates to 'Air quality, noise and neighbourhood amenity;' and section 5 relates to 'Accessibility and active travel'. Positive outcomes are anticipated in respect of all three sections and no suggestions for changes to the policies in the Draft Local Plan were put forward. Although it was suggested that TRN1 could reference the Walking Plan for Tower Hamlets (2011-2021) and Cycling Plan for Tower Hamlets (2009).
- 3.5.8 Section 6 of the matrix relates to 'Crime reduction and community safety' and includes focuses on whether the assessed proposal incorporates elements to design out crime. Policy DH5 'Streets and the Public Realm' does require development to improve safety and perception of safety to pedestrians including elements to design out crime and fear of crime. A recommendation arising from the HIA is that the Local Plan could reference designing out crime principles more generally,

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

- 3.5.9 Positive outcomes were identified in relation to the following sections 7 'Access to healthy food;' 8 'Access to work and training;' 10 'Minimising the use of resources'; and 11 Climate change.'
- 3.5.10 Section 9 on 'Social cohesion and lifetime neighbourhoods' references the six key components of Lifetime Neighbourhoods, which are taken from Government research, (Lifetime Neighbourhoods, Department for Communities and Local Government, December 2011). These are:
- ▶ Empowering residents to develop lifetime neighbourhoods – especially resident empowerment
 - ▶ Access – enabling residents to connect with services and facilities, both physically and virtually;
 - ▶ Services and amenities – a mix of residential, employment and retail uses;
 - ▶ Built and natural environments – environments that promote safe, inclusive access to key services and facilities. Outdoor spaces and buildings that promote social contact. Locally accessible greenspace;
 - ▶ Social networks/well-being – informal/formal opportunities and activities, where people feel safe and confident and which respect the needs of different ages, cultures and ethnicities;
 - ▶ Housing – a range of choices, inclusive design principles and homes designed to meet changing needs.
- 3.5.11 Policy 7.1 of the London Plan and Section 7.5 of the Mayor's Housing Standard also relates to the concept of Lifetime Neighbourhoods.
- 3.5.12 Although the Local Plan does not use the term 'Lifetime Neighbourhoods' it is clear from a review of the principles that policies in the Local Plan are consistent with the principles. Relevant policies include:
- ▶ Policy SG1 'Sustainable Growth in Tower Hamlets' is consistent with the principles relating to access, service and amenities, built and natural environments and social networks and housing;
 - ▶ Strategic Policy TRN1 'Sustainable Travel' is consistent with the principle relating to access;
 - ▶ Strategic Policy CSF1 'Supporting Community, Cultural and Social Facilities' seeks to protect existing community facilities and provide new ones – providing opportunity for social networking and access to services and amenities;
 - ▶ Strategic Policy H1 'Delivering Housing' is consistent with the principle relating to housing.
- 3.5.13 The results suggest that policies will help to secure development that will contribute to a range of positive effects. These relate to factors like housing, transport and mobility, access to healthy food; access to work and training; minimising the use of resources; and climate change. A recommendation arising from the HIA is that the Local Plan could reference designing out crime principles more generally, e.g. Secured by Design (Association of Chief Police officers. Secured by Design, New Homes 2010).
- 3.5.14 The justification for Policy TRN1 could reference the Walking Plan for Tower Hamlets (2011-2021) and the Cycling Plan for Tower Hamlets (2009).

3.6 Key Findings from the EqlA

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

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

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

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

3.7 Key Findings from the HRA

- 3.7.1 The HRA considered potential effects on the following sites:
- ▶ Epping Forest Special Area of Conservation (SAC)
 - ▶ Richmond Park SAC
 - ▶ Wimbledon Common SAC
 - ▶ Lee Valley Special Protection Area (SPA)
 - ▶ Lee Valley Ramsar
- 3.7.2 Analysis of the available European site data and the SSSI condition assessments indicate that the most common reasons for an 'unfavourable' condition assessment of the component SSSI units are effects associated with public access; air pollution; and inappropriate management of some form (e.g. over- or undergrazing, scrub control, water-level management etc.). Public access and air pollution are essentially 'in combination' pressures associated with the general development of

London. A number of threats to the sites are also identified (e.g. climate change; non-native invasive species) which have the potential to undermine the conservation objectives.

- 3.7.3 All of the sites are at least 3 km outside the LBTH area and so the plan will not influence development within the immediate vicinity of the sites; any effects will therefore be 'indirect', associated with the general quantum of development operating 'in combination' with other plans and projects. This also means that the locations of site allocations within LBTH are effectively neutral as far as effects on European sites go. The main mechanism by which the Local Plan could affect these sites is therefore through policies that direct development (or do not control development) such that significant effects are likely. The main environmental aspects, and the pathways by which the Local Plan could potentially affect European sites
- 3.7.4 The policies in the Draft Local Plan have been reviewed, taking into account the interest features of the relevant European sites and the likely outcomes of the policies as drafted. Policies may have effects in their own right, or they may be used to control potential effects or prevent them occurring. A policy should be considered 'likely' to have an effect if the competent authority is unable (on the basis of objective information) to exclude the possibility that the plan could have significant effects on any European site, either alone or in combination with other plans or projects; an effect will be 'significant' if it could undermine the site's conservation objectives. However, it is important that the policy assessment focuses on effects that are objectively possible, rather than just imaginable; furthermore, it is not appropriate for policies to simply re-state existing legislation.
- 3.7.5 The HRA 'screening' undertaken has reviewed the available data and the draft plan. The initial assessment conclusion is that the plan, if delivered as per the draft, will have no significant effects (alone or in combination) on any European sites due to either an absence of impact pathways; policy controls within the plan that can be relied on to ensure significant effects are avoided; or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent.
- 3.7.6 The HRA 'screening' undertaken has reviewed the available data and the draft plan. The initial assessment conclusion is that the plan, if delivered as per the draft, will have no significant effects (alone or in combination) on any European sites due to either an absence of impact pathways; policy controls within the plan that can be relied on to ensure significant effects are avoided; or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent.
- 3.7.7 However, Epping Forest SAC, Lee Valley SPA and Lee Valley Ramsar have features that are potentially sensitive to the outcomes of the plan, particularly via visitor pressure or reduced air quality which are aspects that are known to be currently affecting Epping Forest SAC in particular. It is considered that these sites will have only limited exposure to these effects as a result of the plan, although it is appropriate for the plan to minimise the residual risk through appropriate policy measures designed to minimise the risk of exposure occurring (e.g. air quality assessment requirements or policy controls on locally accessible public space). Therefore, the policy review summarised in Table 4.11 identifies policies that would benefit from amendments to maximise their effectiveness in reducing residual risk. In particular:
- ▶ Air Quality: it is recommended that Policy ES2 be used to help ensure that development arising from the LBTH plan plays a full part (with other plans) in reducing diffuse air pollution that may affect Epping Forest SAC. It is suggested that the text of the policy (or supporting text) require that air quality impact assessments consider potential impacts on European sites, particularly Epping Forest SAC; the text within the existing local plan is likely to be appropriate, although other policy controls and options may be available (NE and the EA will be able to provide further guidance in this regard, particularly as the Epping Forest Council Local Plan is being prepared on a similar timescale to LBTH's Local Plan).
 - ▶ Public Access: It is unlikely that visitor pressure on Epping Forest SAC will increase significantly as a result of the LBTH plan, such that the LBTH plan that need include specific mitigating measures (e.g. SANGS etc), and existing and planned public space in and near the LBTH area (e.g. The Olympic Park and the Lea River Park) are likely to provide some moderating effects in any case. The policy requirements for LBTH can therefore be more holistic, by ensuring that

policies and development controls collectively provide the local recreational amenities (e.g. traffic-free walks / paths; green networks; etc) that are likely to reduce the incentive to regularly travel to Epping Forest SAC. This is largely achieved, although more emphasis or obligation could be placed on developers to clearly demonstrate how policies OS1 – OS4 are met, including consideration of the potential for any adverse effect on European sites as part of their proposals. The need for such an amendment to policy will be discussed with Natural England through consultation on this report.

3.8 Compliance with National Planning Policy Framework

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

Table 3.6: High level review against the NPPF

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

3.9 Recommendations (including Mitigation)

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

Table 3.7: Summary of Recommendations

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

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

Policy Group	Policies	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded?
	Sustainable Travel and TRN2 to TRN4 Sustainable Transport and Freight	transport accessibility is appropriate b) public transport can accommodate the development.	The justification for Policy TRN1 could reference the Walking Plan for Tower Hamlets (2011-2021).
Town centres	Policies Strategic Policies TC.1 and TC.2 and Policies TC3 to TC9	<ul style="list-style-type: none"> Consider adding a reference to the Greater London Authority's (GLAs) SPG on Town Centres in the introductory text. 	Not addressed – details of SPG provided
		<ul style="list-style-type: none"> Consider amending Policy TC.0 (d) to include a list of District Centres. 	Addressed in Policy TC1
		<ul style="list-style-type: none"> Consider adding justification at Policy TC.2 (3) for solid shutters not being permitted, e.g. to make the area more welcoming in the evening. 	Not addressed, relevant policy is now DH11
		<ul style="list-style-type: none"> Policy TC.4 could cross-reference the Council's Statement of Licensing Policy. 	Not addressed, relevant policy is now TC6
		<ul style="list-style-type: none"> Consider whether the policy relating to the night-time economy (TC.4) could draw more from the GLA's SPG on Town Centres (pages 23 to 24). 	Not addressed, relevant policy is now TC6
Open space	Strategic Policy OS1 and OS2 and Policy OS3 and OS4.	<ul style="list-style-type: none"> It was previously suggested that the Plan could acknowledge the All London Green Grid and the contribution that green spaces within the Borough contribute to it. It is noted that a reference to the All London Green Grid has been added to the supporting text. HRA Screening identifies the potential need for projects to provide additional information in relation to provision of recreational space. 	Addressed – Strategic Policy OS1 references the all London Green Grid. Relevance of recreational pressure and European sites to be discussed with Natural England.
Design and historic environment	Strategic Policies DH1 and DH2 and Policies DH3 to DH11	<ul style="list-style-type: none"> Consider whether or not Policy D5 reflects the language and principles set out in the NPPF at paragraphs 132 to 134 and paragraph 138 in relation to the significance of designated heritage assets and their conservation, the concepts of substantial and less than substantial harm etc. 	Partly addressed in relation to the demolition of heritage assets.
		<ul style="list-style-type: none"> Consider splitting Policy D5 into two parts, one dealing with proposals affecting designated assets and one dealing with non-designated assets because the NPPF advocates different approaches to them. 	Not addressed, relevant policy is now DH3.

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

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

4. Conclusions and Next Steps

4.1 Introduction

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

4.2 Key Conclusions Emerging from the Appraisal and Plan Making Process

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

Sustainability Appraisal

- 4.2.3 The SA has identified the potential for the vision, key objectives and policies to make to a range of economic, social and environmental factors. No significant policy gaps were identified. A key recommendation relating to both policies and sites is for later versions of the Local Plan to be clearer about the contribution that new development could make to employment provision, including the role of the Strategic Sites.
- 4.2.4 More detailed suggestions for changes to policy relate to the structure of the policies on heritage D5 and D6 and the extent to which they reflect the language and principles set out in the NPPF at paragraphs 132 to 134 and paragraph 138 in relation to the significance of designated heritage assets and their conservation, the concepts of substantial and less than substantial harm etc.
- 4.2.5 Twenty eight strategic sites have been included as proposed allocations within the Draft Local Plan. Many are major sites identified in the Managing Development Document (April 2013). Two strategic sites are already under construction and therefore have not been appraised.
- 4.2.6 The strategic sites have been appraised using tailored appraisal criteria and associated thresholds of significance. The site appraisal criteria and matrices which report the outcome of this assessment for each strategic site are presented at **Appendix K**. The findings of this appraisal are presented in **Table 3.4** it indicates that the majority of the strategic sites would either have positive or neutral effects on the majority of the SA objectives, with the notable exceptions of SA objectives 10 'Cultural Heritage', 13 'Biodiversity' and 15 'Flood Risk'. The appraisal scores for sites are pre-mitigation, recognising that there is **potential** for a significant effect. Whether or not an effect will happen will, in some cases be dependent on how a site is designed and the mix of uses agreed. The majority of the strategic sites give rise to potential negative effects on these objectives owing to their geographical situation relative to heritage assets, designated sites and flood risk areas respectively.. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan. There are uncertainties around the contribution that sites could make to employment provision at this stage, the Draft Local Plan seeks to protect and re-provide employment space where relevant but the contribution of Strategic sites to the provision of new employment floorspace is uncertain at this time.

Health Impact Assessment

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

Equalities Impact Assessment

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

Habitats Regulations Assessment

- 4.2.10 The HRA 'screening' undertaken has reviewed the available data and the draft plan and the results are presented in **Appendix I**. The initial assessment conclusion is that the plan, if delivered as per the draft, will have no significant effects (alone or in combination) on any European sites due to either an absence of impact pathways; policy controls within the plan that can be relied on to ensure significant effects are avoided; or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent.
- 4.2.11 Epping Forest SAC, Lee Valley SPA and Lee Valley Ramsar have features that are potentially sensitive to the outcomes of the plan, particularly via visitor pressure or reduced air quality which are aspects that are known to be currently affecting Epping Forest SAC in particular. It is considered that these sites will have only limited exposure to these effects as a result of the plan, although it is appropriate for the plan to minimise the residual risk and suggested amendments to policies/supporting text may be required but this will be explored with Natural England through consultation on the Draft Local Plan and this report.

Compliance with the NPPF

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

Recommendations

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

4.3 Monitoring

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

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

4.3.2 Monitoring should be focussed on:

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

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

4.4 Next Steps

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

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

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

4.5 How to Comment on this Report

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

This Consultation: How to Give Us Your Views

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

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

By email: TBC

By post:

FREEPOST

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4.6 Quality Assurance

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



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