



London Borough of Tower Hamlets

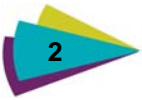
# Integrated Impact Assessment accompanying 'Tower Hamlets 2031: Managing Growth and Sharing the Benefits - Consultation Draft'

Addendum to Draft Report for Cabinet



October 2016

Amec Foster Wheeler Environment  
& Infrastructure UK Limited



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Doc Ref. 38151-01

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## Document revisions

No.	Details	Date
	Addendum to IIA Draft Report for Cabinet	October 2017



# Contents

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<b>1.</b>	<b>Background and Purpose of this Document</b>	<b>5</b>
1.1	Background	5
1.2	Purpose of this Document	5
1.3	Structure of this Document	5
<b>2.</b>	<b>Assessing Options</b>	<b>7</b>
2.1	Introduction	7
2.2	Overview of the Options Considered	7
2.3	Results	8
2.4	Conclusions	13
<b>3.</b>	<b>Assessing Policies</b>	<b>15</b>
3.1	Introduction	15
3.2	Results	15
3.3	Implications for Other Elements of the IIA	17
<b>4.</b>	<b>Recommendations, Further Work and Next Steps</b>	<b>19</b>
4.1	Introduction	19
4.2	Update on Recommendations	19
4.3	Further Work	19
4.4	Next Steps	19

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Appendix A	Policy Options Matrix
Appendix B	Detailed Matrices for the Assessment of Options
Appendix C	: Detailed Matrices for the Assessment of Policies



# 1. Background and Purpose of this Document

## 1.1 Background

- 1.1.1 The London Borough of Tower Hamlets (the Council) has engaged Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler) to undertake an Integrated Impact Assessment (IIA) of the emerging Local Plan for the Borough. The IIA incorporates Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). A Draft Report for Cabinet presents the results of initial work on the IIA and accompanies 'Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Consultation Draft' (the Draft Local Plan). The Draft IIA Report for Cabinet was based on a working draft of the Local Plan which was subject to amendments prior to submission to Cabinet, some of the amendments include recommendations arising from the Draft IIA Report. This approach is consistent with the IIA being an iterative exercise.

## 1.2 Purpose of this Document

- 1.2.1 This is an addendum to the Draft IIA Report and should be read alongside The IIA in Local Plan Appendices Part 2 to item 5.5 Our Borough, Our Plan: A New Local Plan Consultation Document (Regulation 18). The addendum assesses changes to the proposed Local Plan policies and new policies developed since the Draft IIA Report was prepared and also comments on the consideration of options (reasonable alternatives) and assesses options. A consolidated IIA Report that incorporates the information in the Draft Report for Cabinet, this addendum and consideration of any further changes to the Draft Local Plan arising from consideration by Cabinet will be prepared for consultation alongside the Draft Local Plan in November.

## 1.3 Structure of this Document

- 1.3.1 The remainder of this document is structured as follows:
- ▶ Appendix 13 of the Draft Local Plan sets out what options have been considered and why a particular option is preferred at this stage. **Section 2** of this document comments on the options and presents an assessment against the SA objectives used in the main IIA Report where this is considered appropriate to do so. Any implications for the EqIA, HRA and HIA are also considered. It is important to note that the Plan is still under development and more options may emerge as it evolves;
  - ▶ The version of the Draft Local Plan submitted to Cabinet includes one new policy and amendments to other policies and the supporting text. These are assessed against the SA objectives and any implications for the EqIA, HRA and HIA are also considered. **Section 3** of this addendum sets out the results of that work;
  - ▶ The Draft Local Plan is at an early stage of development and there may be a need for further assessment work as the plan progresses. **Section 4** of this report includes an update on previous recommendations and areas where further work may be required. Outstanding recommendations will be considered as part of the preparation of the next draft of the Local Plan.



## 2. Assessing Options

### 2.1 Introduction

- 2.1.1 The Draft IIA Report explains the background to the need to consider options and this is not repeated here. The information in this section will be added to an amended version of the main report for consultation alongside the Draft Local Plan in November.
- 2.1.2 The Draft Local Plan includes a set of tables at Appendix 13 setting out different policy topics and the approach to the consideration of options. This section examines the implications for the IIA, assessing options where necessary. It begins by providing an overview of the options identified by the Council, adapting the tables used by the Council to confirm the approach to the assessment of options for each particular topic.

### 2.2 Overview of the Options Considered

- 2.2.1 The options considered by the Council and the implications for the IIA are set out in **Appendix A**. The appendix provides details of the section of the Draft Local Plan / policy that the options relate to, the different options considered and the Council's preferred option at this stage. The appendix also provides a commentary in terms of how the options have been considered by the IIA.
- 2.2.2 All of the options are considered reasonable for the purposes of the assessment, so for example the Council has confirmed that all of the options relating to affordable housing are unlikely to impact on the viability of development schemes –so they are all considered to be reasonable at this time. It is important to reiterate that the Draft Local Plan is at an early stage of development and there may be a need to consider further options as it develops. In this context, the appendix provides a record of the options considered to date. It is also premature at this stage in the SA/SEA process to provide a full justification for the options considered and why one option was preferred over another, this will be required when the Plan is at Proposed Submission Draft Stage, although information has been provided for the options considered to date.
- 2.2.3 The options considered to date cover the following matters:
- ▶ Tall buildings;
  - ▶ Housing density;
  - ▶ Tenure split for housing;
  - ▶ Achieving a mix of dwellings in terms of size (number of bedrooms);
  - ▶ Ceiling height;
  - ▶ Protection of Preferred Office Locations (POLs) from housing development;
  - ▶ The period over which vacant employment premises must be marketed for;
  - ▶ Town centres;
  - ▶ The mix of retail and non-retail units in centres;
  - ▶ The period over which vacant retail premises must be marketed for;
  - ▶ Safeguarding waste sites;
  - ▶ Targets for reducing carbon emissions;
  - ▶ Car parking standards;
  - ▶ Cycle parking standards; and

- ▶ Delivering the vision.

## 2.3 Results

- 2.3.1 The options described above have been assessed against the 16 SA objectives used in the main IIA Report and in accordance with the methodology set out in Section 2 of the main IIA Report. The results of the appraisal are summarised below, with commentary focussing on any notable differences in performance against the SA objectives. A set of matrices that record the detailed appraisal is attached at **Appendix B**.
- 2.3.2 A general observation is that some of the options, e.g. appropriate mix of retail units in a frontage or the proportion of different types of housing, are detailed in nature. The SA objectives are high level objectives and so assessing detailed options against high level objectives means that there are not necessarily discernible differences between the options in SA terms. In this regard, the role of the SA is not to select options but to inform their selection; options may be preferred for a range of planning related reasons.

### Tall buildings

- 2.3.3 Two options relating to the location of tall buildings were considered:
- ▶ Option 1: Identify suitable tall building zones in the Central Activities Zone (CAZ), Canary Wharf Major Centre and Activity Area and apply a step down approach from the zone; and
  - ▶ Option 2: Maintain existing approach to managing building heights in accordance with the town centre hierarchy.
- 2.3.4 Consideration against the SA objectives suggested that both options could contribute towards liveable neighbourhoods (Objective 2) by ensuring that development is of an appropriate scale. There could be pressure for taller buildings in town centres under Option 2 hence some uncertainty is identified against this objective.
- 2.3.5 Creating clusters of tall buildings at specified locations (Option 1) was identified as providing potential benefits associated with SA objective 6 'Economic Growth'.
- 2.3.6 The main difference between the performance of the options related to SA Objective 10 'Design and heritage.' Directing tall buildings to identified zones and requiring them to step down towards the edge of a specified area (Option 1) was considered to contribute positively to this objective. It is recognised that both options could require buildings to be of a height, scale, mass and volume that are proportionate to location etc. this could be easier to achieve in the tall building zones.
- 2.3.7 The Council has indicated that its preferred approach is Option 1 (see **Appendix A** for reasoning).

### Housing density

- 2.3.8 Two options relating to housing density were considered by the Council:
- ▶ Option 1: Provide further guidance to maintain densities that exceed the London Plan's Density Matrix; and
  - ▶ Option 2: Adopt a locally specific density matrix to manage the scale of development.
- 2.3.9 The findings of the assessment of both options (at **Appendix B**) suggests that there would be little to differentiate between the two options whilst the performance of Option 2 would depend on the detail of the local matrix (relative to the London Plan Density matrix).
- 2.3.10 The Council has indicated that its preferred approach is Option 1 (see **Appendix A** for reasoning).



## Tenure split

- 2.3.11 Tenure split relates to the balance between social and affordable rent and intermediate rent or sale. Three options were considered:
- ▶ Option 1: Adopt a London Plan compliant tenure split of 60/40 for social and affordable rent and intermediate rent or sale respectively;
  - ▶ Option 2: Maintain existing tenure split policy of 70/30 for social and affordable rent and intermediate rent or sale respectively; and
  - ▶ Option 3: Adopt a new tenure split of 80/20 for social and affordable rent and intermediate rent or sale respectively.
- 2.3.12 The assessment suggests that all three options would make a significant contribution to a range of SA objectives, including: 1 'Equality,' 3 'Health and Well Being,' 4 'Housing,' and 8 'Economic Growth.' However, uncertainties were identified in relation to Option 1 across these objectives because it would not reflect the scale of local need (See **Appendix B** for details).
- 2.3.13 The Council has indicated that its preferred approach is Option 2 (see **Appendix A** for reasoning).

## Mix of bedrooms

- 2.3.14 The Council considered three options in relation to the mix of bedrooms in new developments:
- ▶ Option 1: Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds across all three tenures (social and affordable / intermediate and market);
  - ▶ Option 2: Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds across all affordable housing tenures (social and affordable / intermediate); and
  - ▶ Option 3: Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds in the social and affordable tenure only.
- 2.3.15 The findings of the appraisal of the options indicate that all three options would make a significant contribution to a range of SA objectives, including: 1 'Equality,' 3 'Health and Well Being,' 4 'Housing,' and 8 'Economic Growth.' However, uncertainties were identified in relation to Option 3 across these objectives because it would not include intermediate housing (See **Appendix B** for details).
- 2.3.16 The Council has indicated that its preferred approach is Option 2 (see **Appendix A** for reasoning).

## Ceiling height

- 2.3.17 Three options relating to ceiling height were considered by the Council:
- ▶ Option 1: To apply the nationally described space standards for floor to ceiling height of 2.3 m;
  - ▶ Option 2: To apply the London Plan approach of strongly encouraging a floor to ceiling height of 2.5m; and
  - ▶ Option 3: To require a local standard of 2.5m floor to ceiling height.
- 2.3.18 Arguably, Option 1 is not a reasonable alternative because it does not comply with the London Plan but it has been assessed on a precautionary basis.
- 2.3.19 The appraisal of the three options contained at **Appendix B** highlights the potential for positive effects associated with options 2 and 3. These positive effects relate to SA objectives 1 'Equality,' 2 'Health and Well-being' 4 'Housing' and 12 'Climate change.' Uncertainties are identified in relation to Option 2 as the nature of the wording means that outcomes would be uncertain. The potential for minor potential negative effects were also identified for Option 1 in relation to the same objectives, e.g. a lower ceiling height in predominantly flatted development might inhibit cooling and impact on mental health.

2.3.20 The Council has indicated that its preferred approach is Option 3 (see **Appendix A** for reasoning).

### Protection of Preferred Office Locations (POLs) from housing development

2.3.21 The Council considered two options relating to POLs:

- ▶ Option 1: To retain existing prohibition of housing within Preferred Office Locations (POLs); and
- ▶ Option 2: To allow housing within POLs.

2.3.22 The findings of the appraisal contained at **Appendix B** suggests that Option 1 would make a contribution to a range of SA objectives including: 1 'Equality,' 2 'Liveability,' 3 'Health and Well-being,' 4 'Housing,' 5 'Transport' 6 'Education,' 7 'Employment,' 8 'Economic Growth,' 9 'Town Centre,' and 14 'Natural Resources.' It will do this by helping to retain opportunities for employment in accessible locations. Positive outcomes were also identified for Option 2, although the results of the appraisal indicate uncertainties around the resulting mix of uses.

2.3.23 The Council has indicated that its preferred approach is Option 1 (see **Appendix A** for reasoning).

### The period over which vacant employment premises must be marketed for

2.3.24 The Council considered two options:

- ▶ Option 1: To maintain existing 12 month period for evidence of marketing for loss of employment space; and
- ▶ Option 2: To extend 12 month period of evidence to 24 months.

2.3.25 In SA terms, there is little to choose between these options, reflecting the strategic nature of the assessment (see **Appendix B**). Both options could contribute to SA objective 7 'Employment' and related objectives, e.g. 3 'Health' and 1 'Equality, by encouraging the retention of sites for employment use.

2.3.26 The requirement for sites to be marketed for 24 months could delay a site coming forward for development for an alternative, beneficial use. However the Employment Land Review indicates that a period of 24 months is justifiable to ensure that sites are retained in employment use so these different considerations need to be balanced accordingly.

2.3.27 The Council has indicated that its preferred approach is Option 2 (see **Appendix A** for reasoning).

### Town centres

2.3.28 The Council considered two options in relation to the designation of town centres:

- ▶ Option 1: Maintain existing town centre designations; and
- ▶ Option 2: Identify additional town centres and consider re-designation of existing town centres.

2.3.29 **Appendix B** contains the assessment for these options. Both options would deliver benefits associated with safeguarding existing centres (Objective 9) and a range of other SA objectives, e.g. 1 'Equality, 2 'Liveability' and 8 'Economic Growth.' Option 2 takes account of population growth and lower tier plans, e.g. the South Quay masterplan seeks to create a high street environment along Marsh Wall. A new civic hub at Whitechapel is also anticipated. Option 2 also identifies Neighbourhood Parades as a layer in the town centre hierarchy and is judged to perform better against the SA objectives. Simply maintaining existing centres may not keep pace with anticipated growth and would not reflect the aspirations set out above. For these reasons, the outcome is assessed as positive but uncertain for Option 1.

2.3.30 The Council has indicated that its preferred approach is Option 2 (see **Appendix A** for reasoning).

## The mix of retail and non-retail units in centres

- 2.3.31 These options related to the appropriate percentage of retail (A1) units within primary and secondary frontages and three options were considered:
- ▶ Option 1: 70/30;
  - ▶ Option 2: 60/40; and
  - ▶ Option 3: No minimum within secondary frontages.
- 2.3.32 In SA terms (see **Appendix B** for details), there is little to differentiate between options 1 and 2 when considered against the SA objectives and both were scored similarly, with positive outcomes for a range of objectives, including 1 'Equality,' 2 'Liveability,' 3 'Health' 4 'Housing and 5 'Transport.' The potential for some minor negative effects associated with Option 3 was identified because this option could result in a greater prevalence of hot food takeaways, betting shops and pay-day loan shops in secondary frontages, although this is uncertain and would depend on the range of uses that were attracted to any particular area.
- 2.3.33 The Council has indicated that its preferred approach is Option 2 (see **Appendix A** for reasoning).

## The period over which vacant retail premises must be marketed for

- 2.3.34 The Council considered two options:
- ▶ Option 1: Maintain the existing 12 month period for evidence where loss of A1 retail is proposed;
  - ▶ Option 2: Extend period to 18 or 24 months.
- 2.3.35 In SA terms, there is nothing to significantly differentiate between these options. Both options seek to safeguard existing retail provision and in so doing would contribute towards a number of SA objectives that relate to the ability to access retail facilities in sustainable locations (see **Appendix B** for details). These include SA objectives 1 'Equality,' 2 'Liveability,' 3 'Health,' 4 'Housing and 5 'Transport.' There is a need to balance considerations around protecting sites for retail use and the merits of an alternative use so these different considerations need to be balanced accordingly.
- 2.3.36 The Council has indicated that its preferred approach is Option 1 (see **Appendix A** for reasoning).

## Safeguarding waste sites

- 2.3.37 The Council identified two options in respect of waste sites:
- ▶ Option 1: To continue to safeguard licensed waste sites as currently in the Managing Development Document (MDD);
  - ▶ Option 2: To safeguard suitable waste sites as identified in the Waste Management Evidence Base.
- 2.3.38 Both options contribute to a range of SA objectives, including objectives 2 'Liveability,' 'Health and wellbeing' and 5 'Transport and Mobility' (see **Appendix B**). There are also potential effects associated with the management of waste and benefits around the economy (objectives 7 and 8).
- 2.3.39 The assessment highlights that safeguarding existing sites (as proposed under Option 1) might provide less flexibility in terms of planning for waste management facilities. Safeguarding sites on the basis of their wider suitability, (Option 2) meanwhile, could help secure more positive outcomes by providing the opportunity to consider the suitability of sites in broader planning terms and also consider the potential for existing sites to be used for alternative uses if they are no longer considered suitable for waste management facilities.
- 2.3.40 The Council has indicated that its preferred approach is Option 2 (see **Appendix A** for reasoning).

## Targets for reducing carbon emissions

- 2.3.41 The Council identified two options in respect of reducing carbon emissions:
- ▶ Option 1: Require residential and non-residential development (by 2016 and 2019 respectively) to achieve zero carbon with a minimum 45% reduction on-site. (Current Local Plan Policy); and
  - ▶ Option 2: Require residential and non-residential development (by 2016 and 2019 respectively) to achieve zero carbon with a minimum 35% reduction on-site. (Current London Plan Policy).
- 2.3.42 Both options would contribute to zero carbon development with different emphasis on the reduction achieved on sites. As such, both options would contribute to a range of SA objectives (see **Appendix B** for details). In particular, both options could help address issues around fuel poverty contributing to SA objective 1 'Equality' and objective 3 'Health.' There are also benefits associated with the provision of good quality energy efficient housing, a contribution to climate change mitigation (objective 12 'Climate Change') and natural resources (SA objective 14).
- 2.3.43 The Council has indicated that its preferred approach is Option 1 (see **Appendix A** for reasoning).

## Standards for car and cycle parking

- 2.3.44 The Council identified the following options in relation to car parking standards:
- ▶ Option 1: Increase to London Plan standards;
  - ▶ Option 2: Maintain current MDD standards (lower than London Plan); and
  - ▶ Option 3: Reduce standards.
- 2.3.45 The following standards were identified in relation to cycle parking:
- ▶ Option 1: London Plan standards; and
  - ▶ Option 2. Maintain current MDD standards.
- 2.3.46 Increasing car parking (Option 1) could impact on factors like health and air quality but this would depend on the significance of the shift between current and revised standards and the increase in vehicles this would give rise to (see **Appendix B** for details). Proposals would still have to demonstrate air quality neutrality under Option 1. All options would contribute to SA objectives 1 'Equality,' 4 'Housing,' 5 'Transport' 8, 'Economic Growth' and 9 'Town Centres. Both options relating to cycle parking would additionally contribute to SA Objective 3 'Health.'
- 2.3.47 The Council has indicated that its preferred approach is Option 3 for car parking and Option 2 for cycle parking (see **Appendix A** for details).

## Delivering the vision.

- 2.3.48 These options relate to the approach to spatial planning in the Borough, given that it is made up of 24 places (the Hamlets) but the focus of growth (Opportunity Areas) in the London Plan. The Council identified 3 options:
- ▶ Option 1: Maintain the existing 24 places;
  - ▶ Option 2: Take forward the GLAs designated Opportunity Areas as sub areas; and
  - ▶ Option 3: Merge Option 1 and 2 and designate the remaining part of the Borough as the central sub-area.
- 2.3.49 The previous IIA Report considered options 1 and 3 but Option 2 has also now been assessed and the results for all 3 options are set out in **Appendix B**.
- 2.3.50 All three options were assessed as making a significant contribution to all SA objectives. However, Option 1 has uncertainties associated with SA objectives that would benefit from a more strategic approach. Option 2 from a Borough perspective also performs similarly in some instances because

it is focussed on the Opportunity Areas. Option 3, meanwhile, would enable planning at the borough (and cross-borough level) for key infrastructure but also ensure that local character etc. is respected across the Borough. In terms of helping to plan for, and deliver, infrastructure relevant objectives include SA objective 5 'Transport' and the growth anticipated in the London Plan, SA objective 8 'Economic Growth.' Option 3 is judged to be the better performing option.

2.3.51 The Council has indicated that its preferred approach is Option 3.

## 2.4 Conclusions

2.4.1 An assessment of the options identified by the Council has been undertaken. This has not identified any suggestions for mitigation. This work will be incorporated into the consolidated IIA Report and consulted on in November alongside the Draft Local Plan. Further consideration will need to be given to options as the work progresses.



## 3. Assessing Policies

### 3.1 Introduction

- 3.1.1 There is one new policy in the section of the Draft Local Plan on Economy and Jobs in Tower Hamlets that has not been previously assessed. A number of amendments to policies in the Draft Local Plan section on Design and Historic Environment have also been made, including the deletion of a policy with the principles incorporated in other policies. This section comments on these and other changes.

### 3.2 Results

- 3.2.1 The results of the additional assessment work are considered below both in terms of the implications for the SA and other elements of the IIA.

#### Economy and Jobs

- 3.2.2 A new policy on the provision of affordable workspace (EMP6) has been included in the latest version of the Draft Local Plan and has been assessed against the SA objectives. The matrix for all employment policies has been updated with the inclusion of the new policy (see **Appendix C**).
- 3.2.3 Policy EMP6 contributes to a range of objectives, in common with other policies in the section. These include SA objectives 1 'Equality,' 2 'Liveability,' 3 'Health and wellbeing,' 5 'Transport,' 6 'Education,' 7 'Employment,' 8 'Economic Growth,' 9 'Town Centres' 12 'Climate change,' 14 'Resource use' and 16 'Contaminated land.' No suggestions for mitigation or enhancement arose from the assessment. These results will be incorporated into the consolidated main report along with the write up of the results for other policies in the section.

#### Design and Heritage

- 3.2.4 The revised assessment for policies in relation to design and heritage are attached at **Appendix C**. This reflects the deletion of a policy on streets and the public realm, with the provisions of that policy incorporated in other policies in the section and the consequential renumbering of policies. No suggestions for mitigation or enhancement arose from the assessment. The assessment of the revised policies is summarised below.

This section of the Draft Local Plan contains a set of policies relating to design and the historic environment. There are three strategic policies, DH1 'Good design, local character' and DH2 'Creating Attractive and Safe Streets, Spaces and Public Realm' and 'Strategic Policy DH3 'The Historic Environment.' Other policies are as follows:

- ▶ DH4 'World Heritage Sites';
- ▶ DH5 'Building Heights';
- ▶ DH6 'Density';
- ▶ DH7 'Amenity';
- ▶ DH8 'Noise Pollution';
- ▶ DH9 'Overheating';
- ▶ DH10 'Shopfronts';
- ▶ DH11 'Advertisements and Hoardings'; and
- ▶ DH12 Telecommunications.

- 3.2.5 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.
- 3.2.6 Policies will also have a significant positive effect in relation SA Objective 3 'Health and well-being' by promoting a range and mix of high-quality, publicly accessible green spaces. Policy DH8 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 DH8 requires new development to avoid contributing to overheating which will have a significant positive effect on this objective.
- 3.2.7 Strategic Policy DH2 will have a significant positive effect in relation to 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 significant positive effect on this SA objective. Policy DH1, meanwhile, 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.
- 3.2.8 Strategic Policy DH1 and Strategic Policy DH2 will have a significant positive effect in relation to SA Objective 8 'Economic Growth'. 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, the 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.
- 3.2.9 All of the policies are assessed as having a significant positive effect in relation to SA Objective 10 'Design and Heritage.' Strategic Policy DH3 and Policy DH4 set out criteria to protect a range of recognised heritage assets. The other policies of this section 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.
- 3.2.10 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 significant positive effect on this SA objective.
- 3.2.11 As noted above, 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 has been assessed as having 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 also 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 also directly contribute to, and have a major positive effect on, this SA objective.
- 3.2.12 A significant positive effect is anticipated in relation to SA Objective 12 'Climate Change' and Policy DH9 which requires that developments are designed to avoid overheating.



- 3.2.13 Policies also make significant positive contributions in relation to biodiversity, flood risk, natural resources and contaminated land.
- 3.2.14 While positive contributions are anticipated, a suggestion has been made in relation to Strategic Policy DH3 '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.

### Changes to Other Policies

- 3.2.15 A number of detailed changes to policies have been introduced since the Draft IIA Report for Cabinet was prepared and these will need to be reflected in the consolidated document. There have been new elements added to H1 (Londoner First Policy), H2 (estate regeneration) and DC1.2 (vacant building credit).
- 3.2.16 These are not considered to affect the overall results of the assessments for these policies. The Londoner First policy could bring benefits by ensuring that dwellings meet the needs of Londoners.
- 3.2.17 The additions to Policy H2 in relation to Estate Regeneration are welcomed as these will help ensure that estate regeneration schemes meet existing and future needs for affordable housing and will help ensure that existing residents are able to stay on affected estates.
- 3.2.18 The amendment to policy in relation to the reference to the vacant building credit is not anticipated to give rise to significant effects.

## 3.3 Implications for Other Elements of the IIA

- 3.3.1 The IIA includes:
- ▶ Equalities Impact Assessment (EqIA);
  - ▶ Health Impact Assessment (HIA);
  - ▶ Habitats Regulations Assessment (HRA).
- 3.3.2 The amendments to policies outlined above will need to be reflected in the relevant documentation, e.g. references to policies in the Design and Heritage section will need updating in all the documentation. This will be undertaken for the consolidated report.
- 3.3.3 None of the proposed changes are considered to alter the results of the previous assessments, although alterations to policy in relation to estate regeneration are anticipated to have positive impacts that will need to be reflected in the HIA and EqIA.
- 3.3.4 None of the proposed changes are considered to have implications for the HRA.



## 4. Recommendations, Further Work and Next Steps

### 4.1 Introduction

- 4.1.1 This section updates the table of recommendations from the Draft IIA Report for Cabinet. It then discusses the need for further work as the Draft Local Plan and IIA progress.

### 4.2 Update on Recommendations

- 4.2.1 **Table 4.1** below replaces Table 3.7 in the Draft IIA Report for Cabinet and the table reflects those recommendations that have been addressed. The majority of suggestions have been addressed. Any outstanding recommendations will be considered by the Council as part of the preparation of the next version of the Local Plan.

### 4.3 Further Work

- 4.3.1 The Draft Local Plan includes site specific information that may need assessing on a precautionary basis, i.e. to ensure compliance with the SEA Directive. The site specific information includes:

- ▶ the sites and areas of search listed in Policy ES7 on waste management;
- ▶ the boundaries for Town Centres identified in the appendices to the Plan, including proposed new town centres and additions to primary frontages;
- ▶ the boundaries for Tall Buildings Zones.

- 4.3.2 Whilst the policies associated with these and other areas have been assessed, it is arguable that the site specific implications also need to be addressed. It is proposed to consult on this matter as part of the Regulation 18 consultation, with subsequent work addressing these matters if necessary.

### 4.4 Next Steps

- 4.4.1 A consolidated IIA Report for consultation alongside the Draft Local Plan that incorporates the information in the Draft Report for Cabinet, this addendum and consideration of any further changes to the Draft Local Plan arising from consideration by Cabinet will be prepared for consultation alongside the Draft Local Plan in November. As noted above, outstanding recommendations will be considered as part of the preparation of the next draft of the Local Plan.

Table 4.1: Summary of Recommendations – Updated to Reflect the Version of the Draft Local Plan Considered by Cabinet on 4<sup>th</sup> November

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 11 with the Policy Context set out more fully from page 24.
		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 the overall contribution of Strategic Sites to meeting housing need to 2031 and also information on supply from other sources. Our understanding is that for later versions of the Plan to be found sound the contribution that individual strategic sites will make to meeting development needs will need to be made explicit in the Plan.
		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. However officers have subsequently confirmed that the Local Plan may need reviewing in 2019 depending on the outcome of the London Plan review – so comment addressed.
		The Local Plan could have a policy that sets out the Council's intention to support the production of NDPs.	Addressed – supporting text of the document (page 17) sets out support for the production of NDPs. Also Key Objective 2 'Sharing the Benefits of Growth' references support to the process of Neighbourhood Planning. Section 5 on Placemaking also identifies the role 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 to the Draft Local Plan.

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?
		<p>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.</p>	<p>New recommendation – to be addressed in Regulation 19 Version of the Local Plan.</p>
		<p>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.</p>	<p>Addressed – the Council has confirmed that the central area will not be promoted as an Opportunity Area and this is referenced in the Draft Local Plan.</p>
The Economy	Strategic Policy EMP1 and 2 and Policies EMP3 to 5	<ul style="list-style-type: none"> <li data-bbox="481 592 1247 740">• 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.</li> <li data-bbox="481 759 1247 938">• 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.</li> <li data-bbox="481 957 1247 1050">• Consider adding a justification for the presumption against live-work and work-live units set out in policy (relevant policy is now EMP3).</li> <li data-bbox="481 1069 1247 1217">• 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.</li> </ul>	<p>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.</p> <p>Addressed – reference now added to the Employment Land Review (2016) in Policy EMP4 ‘Protecting Employment’.</p> <p>Addressed – In the justification to Policy EMP3.</p> <p>Addressed - SG1 references these principles.</p>
Housing delivery	Strategic Policy H1 Delivering Housing and Policies H2 to H6.	<ul style="list-style-type: none"> <li data-bbox="481 1256 1247 1299">• Policy H5 safeguards the existing Gypsy and Traveller site at Old Willow Close.</li> </ul>	<p>New recommendation - It is recommended that the site is identified on the Proposals Map once it is prepared.</p>

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?
Transport and connectivity	Strategic Policy TRN1 Sustainable Travel and TRN2 to TRN4 Sustainable Transport and Freight	<ul style="list-style-type: none"> <li>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 transport accessibility is appropriate b) public transport can accommodate the development.</li> <li>Policy TRN1 could reference the Cycling Plan for Tower Hamlets (2009)</li> <li>The justification for Policy TRN1 could reference the Walking Plan for Tower Hamlets (2011-2021)</li> </ul>	<p>Addressed in the text on implementation to Policy TRN2</p> <p>Addressed in DH2 Not addressed.</p>
Town centres	Policies Strategic Policies TC.1 and TC.2 and Policies TC3 to TC9	<ul style="list-style-type: none"> <li>Consider adding a reference to the Greater London Authority's (GLAs) SPG on Town Centres in the introductory text.</li> </ul>	Addressed – Document now referenced in the introductory text to the Section on Town Centres
		<ul style="list-style-type: none"> <li>Consider amending Policy TC.0 (d) to include a list of District Centres.</li> </ul>	Addressed in Policy TC1
		<ul style="list-style-type: none"> <li>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.</li> </ul>	Addressed – justification for DH10 Shopfronts.
		<ul style="list-style-type: none"> <li>Policy TC.4 could cross-reference the Council's Statement of Licensing Policy.</li> </ul>	Addressed - supporting text to TC6.
		<ul style="list-style-type: none"> <li>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).</li> </ul>	Addressed – Document now referenced in the introductory text to the Section on Town Centres
Open space	Strategic Policy OS1 and OS2 and Policy OS3 and OS4.	<ul style="list-style-type: none"> <li>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.</li> <li>HRA Screening identifies the potential need for projects to provide additional information in relation to provision of recreational space.</li> </ul>	<p>Addressed – Strategic Policy OS1 references the all London Green Grid.</p> <p>Relevance of recreational pressure and European sites to be discussed with Natural England.</p>
	Strategic Policies DH1 and	<ul style="list-style-type: none"> <li>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.</li> </ul>	Partly addressed in relation to the demolition of heritage assets.

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?
Design and historic environment	DH2 and Policies DH3 to DH11	<ul style="list-style-type: none"> <li>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.</li> </ul>	Not addressed, relevant policy is now DH3.
		<ul style="list-style-type: none"> <li>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.</li> </ul>	Not addressed, relevant policy is now DH4.
		<ul style="list-style-type: none"> <li>Consider a reference to 'designing out crime' principles in this section.</li> </ul>	Addressed, Policy DH2 'Attractive and Safe Streets, Spaces and Public Realm' references the approach.
Community facilities	Policies Strategic Policy CSF1 and CSF2 and Policies CSF3 to CSF9	<ul style="list-style-type: none"> <li>Consider an explicit reference to the provision of community facilities through shared spaces, e.g. in Policy C1.</li> </ul>	Addressed - Encouraging shared facilities, where appropriate, is referenced in Key Objective 1 under implementation and the supporting text to CSF1.
Urban greening and biodiversity	Policy ES3	<ul style="list-style-type: none"> <li>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.</li> </ul>	Addressed – the justification for Policy ES3 identifies types of areas that can experience the Heat Island effect and also specific designations that may be more susceptible.
		<ul style="list-style-type: none"> <li>Policy ES2 seeks to project 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).</li> </ul>	Addressed in Policy ES3.
The Environment	Policy ES2 Policy ES4 Policy ES5,	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>	Addressed in the justification for Policy ES4  Not addressed at this stage but the borough council has indicated that it will be addressed in the Regulation 19 Version of the Local Plan.
		<ul style="list-style-type: none"> <li>Previous recommendation relating to reference to voluntary schemes like the Housing Quality Mark be incorporated elsewhere in the draft Plan.</li> </ul>	Addressed in Policy DH1
Developer Contributions	Policy DC1	<ul style="list-style-type: none"> <li>Previous observation – did the Local Plan provided the necessary 'policy hook' for the Planning Obligations SPD.</li> </ul>	Addressed - Policy DC1 provides the hook for the SPD.

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?
Managing change	Previously suggested new policy	<ul style="list-style-type: none"> <li>Previous suggestion for a new policy that highlights the need to manage potential effects associated with the delivery of new development, including measures to ensure that effective community engagement takes place and that the construction phase is managed has been incorporated in CC1.</li> </ul>	Addressed in SG2.
Site capacity	N/A	<ul style="list-style-type: none"> <li>For the purposes of undertaking the IIA (and demonstrating soundness) it would be helpful if the schedule included the anticipated housing/employment capacity of each site and the proportion anticipated to be developed within the plan period.</li> </ul>	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"> <li>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.</li> </ul>	LBTH has confirmed that no potential strategic sites were rejected.
Consultation	Page 5 of document	<ul style="list-style-type: none"> <li>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</li> </ul>	Addressed – additional consultation will be undertaken.





# Appendix A

## Policy Options Matrix

Appendix A: Policy Options Matrix

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

Chapter/Topic	Policy	Options	Council's Preferred option and rationale	Implications for the IIA
				Option 2 would not be, depending on how different the matrix was from that in the London Plan and the justification for it. Both options have been assessed on a precautionary basis.
<b>Ch.4.3:Housing in Tower Hamlets</b>				
Mixed and Balanced Communities	Policy H2.1	<ol style="list-style-type: none"> <li>1. Adopt a London Plan compliant tenure split of 60/40 for social and affordable rent and intermediate rent or sale respectively.</li> <li>2. Maintain existing tenure split policy of 70/30 for social and affordable rent and intermediate rent or sale respectively.</li> <li>3. Adopt a new tenure split of 80/20 for social and affordable rent and intermediate rent or sale respectively.</li> </ol>	<p><b>Option 2</b></p> <p>The LBTH SHMA 2014 shows an objectively assessed need for the new housing stock to comprise 62.3% social rented housing and 4.3% intermediate housing. These figures are substantially different from the 2013 London Strategic Housing Market Assessment.</p>	<p>Policy 3.11 of the London Plan 'Affordable Housing Targets' is relevant here.</p> <p>The supporting text to the policy states (paragraph 3.69): "<i>The Mayor will engage with boroughs individually to enable them to set local affordable housing targets which are in general conformity with the London Plan's strategic targets.</i>"</p> <p>All three options are considered to be reasonable and have been assessed.</p>
Mixed and Balanced Communities	Policy H2.5	<ol style="list-style-type: none"> <li>1. Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds across all three tenures (social and affordable / intermediate and market)</li> <li>2. Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds across all affordable housing tenures (social and affordable / intermediate).</li> <li>3. Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds in the social and affordable tenure only.</li> </ol>	<p><b>Option 2</b></p> <p>The LBTH SHMA 2014 identifies that the majority of Tower Hamlets need is in the affordable sector. As such the delivery of this form of housing is a priority for the borough.</p>	<p>Policy 3.4 of the London Plan seeks to optimise housing potential. The supporting text at paragraph 3.29 states: <i>The form of housing output should be determined primarily by an assessment of housing requirements and not by assumptions as to the built form of the development. While there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good public transport accessibility (measured by Public Transport Accessibility Levels [PTALs]), and lower density development is generally most appropriate for family housing.</i></p>

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

				It is assumed for the purpose of this SA that Option 2 would involve the loss of office space without it being replaced, this would be contrary to London Plan Policy 4.3 but it has been assessed on a precautionary basis.
Employment Locations	EMP4.2ai	<ol style="list-style-type: none"> <li>1. To maintain existing 12 month period for evidence of marketing for loss of employment space</li> <li>2. To extend 12 month period of evidence to 24 months</li> </ol>	<b>Option 2</b> The need to maintain employment floorspace to meet needs means that a greater period of marketing evidence is required	<p>Policy .4.4 of the London Plan 'Managing Industrial Land and Premises' requires a rigorous approach to industrial land management to ensure a sufficient stock of land and premises.</p> <p>Both approaches are consistent with policy and have been assessed.</p>
<b>Ch.4.5:Town Centres in Tower Hamlets</b>				
Protecting and Enhancing Our Town Centres	TC2.1	<ol style="list-style-type: none"> <li>1. Maintain existing town centre designations</li> <li>2. Identify additional town centres and consider re-designation of existing town centres</li> </ol>	<b>Option 2</b> Additional town centres have been identified to strengthen the borough's network of town centres and retail provision, and to support future growth	<p>Policy 2.15 of the London Plan 'town Centres states:</p> <p>Identified deficiencies in the network of town centres can be addressed by promoting centres to function at a higher level in the hierarchy or by designating new centres where necessary.</p> <p>Both options have been assessed.</p>
	TC2.2a & b	To consider an appropriate percentage of retail (A1) units within primary and secondary frontages: <ol style="list-style-type: none"> <li>1. 70/30</li> <li>2. 60/40</li> <li>3. No minimum within secondary frontages</li> </ol>	<b>Option 2</b> This is to ensure a dominance of A1 units within the primary shopping areas without over concentrating A1 units in such areas, and to ensure a range of uses throughout the wider town centres.	<p>London Plan Policy 4.8 'Supporting A Successful And Diverse Retail Sector And Related Facilities And Services' states that LDFs should take a proactive approach to planning for retail an related facilities and active and manage clusters of uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan.</p> <p>All options are considered reasonable and have been assessed.</p>
Protecting and Enhancing Retail in our Town Centres	TC3.1aii	<ol style="list-style-type: none"> <li>a. Maintain the existing 12 month period for evidence where loss of A1 retail is proposed</li> <li>b. Extend period to 18 or 24 months</li> </ol>	<b>Option 1</b> It is considered that the existing requirement is sufficient, and where A1 uses are genuinely unviable	<p>London Plan Policy 4.8 'Supporting A Successful And Diverse Retail Sector And Related Facilities And Services.'</p> <p>Both options are considered reasonable and</p>

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

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

			Hamlets is currently the third worst performing borough within the capital <sup>1</sup> . This policy maintains the Council's policy trajectory which has required progressive reductions in developments' carbon emissions.	Both options are considered reasonable and have been assessed.
<b>Ch.4.9:Transport and connectivity in Tower Hamlets</b>				
Car parking standards (Appendix Two)	TRN3.1 Parking and Permit-free	<ol style="list-style-type: none"> <li>Increase to London Plan standards</li> <li>Maintain current MDD standards (lower than London Plan)</li> <li>Reduce standards</li> </ol>	<b>Option 3</b>  This is to better reflect the borough's unique local characteristics, relatively high levels of public transport accessibility, the level of parking stress and highway congestion within the borough.	London Plan Policy 6.13 'Parking' states:  <i>"The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use."</i>  It continues: <i>"the maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards in DPDs."</i>  All three options are considered reasonable and have been assessed.
Cycle parking standards (Appendix Two)	TRN3.5 Parking and Permit-free	<ol style="list-style-type: none"> <li>London Plan standards</li> <li>Maintain current MDD standards</li> </ol>	<b>Option 2</b>  In response to the tightened car parking standards proposed for residential and office uses, it is necessary for the corresponding minimum cycling parking standards to ensure those developments provide good quality and sufficient cycle parking to encourage the potential for growth in cycling journeys to be realised.	London Plan Policy 6.13 'Parking' states in relation to cycling: <i>"meet the minimum cycle parking standards set out in Table 6.3"</i>  Both options are considered reasonable and have been assessed.
<b>Ch.4.10:Developer Contributions</b>				
		No reasonable alternative policy options have been identified. This Local Plan must be in general conformity with the London Plan and the NPPF.		Noted.
<b>Ch.5: Delivering</b>				

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

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





# Appendix B

## Detailed Matrices for the Assessment of Options

Note – page numbers in the header should be prefixed with the Appendix letter and must be manually edited for each Appendix section.



### SA of Options Relating to Tall Buildings

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

<p>4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>Both options could result in the provision of housing, depending on the mix of uses proposed.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p>~</p>	<p>~</p>
<p>5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>Both options could result in the provision of development within areas of good public transport accessibility performance of both options is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p>~</p>	<p>~</p>
<p>6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between either of the options and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p>~</p>	<p>~</p>
<p>7. Employment: Reduce worklessness and Increase</p>	<p><b><u>Likely Significant Effects</u></b></p>	<p>~</p>	<p>~</p>

<p>employment opportunities for all residents</p>	<p>Both options could include opportunities for employment, depending on the mix of uses proposed, which could contribute to this objective, however the objective could also be achieved through other forms of development. On balance the performance of each option is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>		
<p>8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>DH5 directs Tall Building proposals to designated Tall Building Clusters. This could help create clusters of firms that desire such a location, it is uncertain how relevant this would be as a locational factor so a minor positive effect has been recorded. Option 2 might lead to a more dispersed approach and therefore achievement of this objective is judged to be uncertain.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>Uncertainty around the importance of clustering of tall buildings as a driver for economic activity identified.</p>	<p style="text-align: center;">+</p>	<p style="text-align: center;">+/?</p>
<p>9. Town Centres: Promote diverse and economically thriving town centres.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral as both options could lead to developments that promote diverse and economically thriving town centres.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p style="text-align: center;">~</p>	<p style="text-align: center;">~</p>
<p>10. Design and Heritage: Enhance and conserve</p>	<p><b><u>Likely Significant Effects</u></b></p>	<p style="text-align: center;">+</p>	<p style="text-align: center;">+/?</p>

<p>heritage and cultural assets; distinctive character and an attractive built environment.</p>	<p>Directing tall buildings to identified zones and requiring them to step down towards the edge of a specified area will contribute to this objective. Managing the height of both options could require buildings to be of a height, scale, mass and volume that are proportionate to location etc. about this could be easier to achieve in the tall building zones.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>		
<p>11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral as both options could include provision of open space.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
<p>12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral as both options could be pursued having regard to issues associated with the urban heat island effect, micro climate etc.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
<p>13. Biodiversity: Protect and enhance biodiversity, natural</p>	<p><b><u>Likely Significant Effects</u></b></p>	~	~

<p>habitats, water bodies and landscapes of importance.</p>	<p>Policy DH5 sets out criteria to assess the acceptability of tall building proposals, including specifically a requirement to avoid adverse impacts on biodiversity. This would safeguard ecological interests, although taking account of the narrow scope of this policy in relation to biodiversity, Option 2 could include the same sort of considerations so performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>		
<p>14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
<p>15. Flood risk reduction and management: To minimise and manage the risk of flooding</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral as both options would be likely to result in development in flood risk areas.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
<p>16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects</p>	<p><b><u>Likely Significant Effects</u></b></p>	~	~

<p>of contaminated land on human health.</p>	<p>Performance against this objective is considered to be neutral as both options could contribute to the objective through the re-use of land and buildings and include criteria around presenting a human scale of development at the street level.</p> <p>.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>		
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### SA of Options for Approaches to Managing the Density of Development

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

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

SA Objective	Commentary	Option 1: Further Guidance on densities	Option 2: Local Density Matrix
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between the options and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b><u>Likely Significant Effects</u></b></p> <p>A policy on density would contribute to this objective by ensuring that development takes account of the location and existing character. Both options could contribute to this objective but the outcome of option 2 is uncertain in the absence of more detail on the content of a local density matrix.</p> <p><b><u>Mitigation</u></b></p>	+	+/?

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

SA Objective	Commentary	Option 1: Further Guidance on densities	Option 2: Local Density Matrix
	None identified.		
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~

### SA of Options for Affordable Housing Mix

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

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

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



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

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

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

### SA of Options for mix of bedrooms

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

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
<p>3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>The provision of appropriately sized affordable housing will contribute to this objective. Option 3 would make a significant contribution but given the level of need identified in the SHMA an uncertainty has been indicated to reflect the fact that it would not reflect local needs.</p> <p><b><u>Mitigation</u></b></p> <p>None identified</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++	++	++/?
<p>4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>The options would result in the provision of affordable housing. Option 3 would make a significant contribution but given the level of need identified in the SHMA an uncertainty has been indicated to reflect the fact that it would not reflect local needs.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++	++	++/?
<p>5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b><u>Likely Significant Effects</u></b></p> <p>The provision of housing will help support economic growth across the Borough. All options would make a contribution to this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None identified</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++	++	++

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None identified</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None required.</p>	~	~	~
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None required.</p>	~	~	~

SA Objective	Commentary	Option 1: Mix of beds across all tenures	Option 2: Mix of beds for all affordable housing tenures	Option 3: Mix of beds for social and affordable tenure only
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None identified</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None required.</p>	~	~	~
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>It is assumed that in directing housing to accessible locations and high density areas, Policy H1 has taken account of potential air quality effects in these locations/areas.</p> <p><b><u>Uncertainties</u></b></p> <p>None required.</p>	~	~	~



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

## SA of Options: Ceiling Height

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

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

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

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

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

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

## SA of Draft Policies: Economy and Jobs

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



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

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

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

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

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

### SA of Options for Marketing Period for Vacant Employment Sites

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

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

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



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

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

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

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

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

### SA of Options for Town Centre Designations

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

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

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



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

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

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

### SA of Options for Retail (A1 Uses) for Major and District Centres

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

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

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

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

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



SA Objective	Commentary	Option 1: 70/30 split for retail and non-retail units in primary and secondary frontages	Option 2: 60/40 split for retail and non-retail units in primary and secondary frontages	Option 3: No minimum within secondary frontages
	<p><b><u>Mitigation</u></b> None identified.</p> <p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>			
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b><u>Likely Significant Effects</u></b> There is no clear relationship between the options and this SA objective.</p> <p><b><u>Mitigation</u></b> None required.</p> <p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>	~	~	~
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b><u>Likely Significant Effects</u></b> There is no clear relationship between the options and this SA objective.</p> <p><b><u>Mitigation</u></b> None identified.</p> <p><b><u>Assumptions</u></b> None identified.</p> <p><b><u>Uncertainties</u></b> None identified.</p>	~	~	~

### SA of Options for Evidence of Marketing A1 Premises

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

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

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

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

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

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

### SA of Options for Safeguarding Waste Sites

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



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

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

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

### SA of Options for On-site Carbon Reduction

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

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

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

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

### SA of Options in Relation to Car and Cycle Parking

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b><u>Likely Significant Effects</u></b></p> <p>It will be important for all options to ensure that sufficient parking is provided for disabled persons.</p> <p>Providing adequate parking for bicycles will help provide transport choice.</p> <p>All options relating to car parking and cycle parking are considered to contribute towards this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	+	+	+	+	+



SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b><u>Likely Significant Effects</u></b></p> <p>Adequate car and cycle parking will contribute to liveability. All options are considered to contribute towards this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	+	+	+	+	+
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b><u>Likely Significant Effects</u></b></p> <p>Options relating to cycle parking could help increase cycling within the Borough, resulting in improved physical health through exercise and a direct major positive effect on this SA objective.</p> <p>Increasing car parking could impact on health, e.g. by impacting on air quality (although developments would need to demonstrate air quality neutrality) so the overall effect is uncertain.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	-/?	+	+	++	++

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b><u>Likely Significant Effects</u></b></p> <p>Parking provision for affordable family homes and accessible properties would contribute towards this objective and a minor positive effect is anticipated.</p> <p>.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	+	+	+	+	+
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b><u>Likely Significant Effects</u></b></p> <p>All options would contribute towards this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++	++	++	++	++

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	<p><b><u>Likely Significant Effects</u></b></p> <p>The performance of options against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None required.</p>	~	~	~	~	~
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b><u>Likely Significant Effects</u></b></p> <p>Performance of the options against this objective is considered to be neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None identified</p> <p><b><u>Assumptions</u></b></p> <p>It is assumed through directing development to highly accessible locations the public transport network can connect local residents with local employment opportunities (i.e. that spatial mismatch does not occur or that public transport networks do not serve the local employment seeking population).</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~	~	~

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b><u>Likely Significant Effects</u></b></p> <p>Reducing congestion could contribute to this objective but the overall impact of options is uncertain.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	+	+	+	+	+
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b><u>Likely Significant Effects</u></b></p> <p>Ensuring adequate parking within town centres would contribute to this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	+	+	+	+	+

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~	~	~
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~	~	~

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b><u>Likely Significant Effects</u></b></p> <p>Reduced parking for cars and improved parking for cycling could contribute to this objective. Option 1 might result in increased car use and associated emissions.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	-/?	+	+	+	+
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~	~	~

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	<p><b><u>Likely Significant Effects</u></b></p> <p>Reduced parking for cars and improved parking for cycling could contribute to this objective. Option 1 might result in more car use and an impact on air quality, although development would need to demonstrate that it was air quality neutral.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	-/?	+	+	+	+
15. Flood risk reduction and management: To minimise and manage the risk of flooding	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~	~	~

SA Objective	Commentary	Options				
		Option 1: Increase car parking to London Plan standards	Option 2: Maintain Borough's Current Standards (Lower than London Plan)	Option 3: Reduce the Borough's Current Car Parking Standards	Option 1: London Plan Standards for Cycle parking	Option 2: Maintain Current Borough standards for Cycle Parking
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~	~	~



### Approach to Sub Areas

SA Objective	Commentary	Option		
		Option 1: 24 Places Approach Acknowledging the Opportunity Areas in the London Plan	Option 2: Take Forward GLAs Opportunity Areas as sub areas	Option 3: Merge Option 1 and 2 and designate the remaining part of the Borough as the Central Sub Area
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	All alternatives could contribute, Option 1 could be more sensitive to local needs. Option 2 would focus on the Opportunity Areas. Option 3 could provide a better basis for securing and co-ordinating investment through the Infrastructure Delivery Plan across the whole of the Borough.	++/?	++/?	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	Option 1 could be more sensitive to local needs. Option 2 would focus on the Opportunity Areas. Option 3 might encourage/enable a more 'joined up' approach to planning for neighbourhoods, e.g. in relation to public transport and infrastructure across the Borough.	++	++/?	++
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	Option 1 could be more sensitive to local needs. Option 2 would focus on the Opportunity Areas. Option 3 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 all options.	++	++	++
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	Option 3 could be better in terms of analysing capacity issues and securing strategic transport infrastructure across the Borough.	++/?	++/?	++
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.	Option 1 could be more sensitive to local needs. Option 2 would focus on the Opportunity Areas. Option 3 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 all options.	++	++	++

SA Objective	Commentary	Option		
		Option 1: 24 Places Approach Acknowledging the Opportunity Areas in the London Plan	Option 2: Take Forward GLAs Opportunity Areas as sub areas	Option 3: Merge Option 1 and 2 and designate the remaining part of the Borough as the Central Sub Area
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. Options 2 and 3 align to the opportunity Areas.	++/?	++	++
9. Town Centres: Promote diverse and economically thriving town centres.	Considered to be neutral for all options.	++	++	++
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	Option 1 could be more sensitive to local needs.	++	++/?	++/?
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	Option 1 could be more sensitive to local needs, Option 2 might focus on the Opportunity Areas but Option 3 could encourage/enable investment in the green grid on a more strategic, cross Borough basis.	++/?	++/?	++
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 Option 3 provides the basis for planning for strategic flood infrastructure.	++/?	++/?	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	Option 1 could be more sensitive to local needs but Option 3 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	Option 1 could be more sensitive to local needs but Option 3 could encourage/enable planning for Borough wide schemes.	++/?	++/?	++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	Option 3 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 all options.	++	++	++



# Appendix C : Detailed Matrices for the Assessment of Policies



### SA of Draft Policies: Economy and Jobs

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	Policy EMP6: Providing Affordable Workspace	
<p>1. Equality: Reduce poverty and social exclusion and promote equality for all communities.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>At present the Local Plan does not make explicit the number of jobs to be provided over the period to 2031 by new development, although the Draft Local Plan anticipates 125,000 jobs by 2031. The Policies are however judged to make a significant positive contribution to this objective because they provide the policy context for encouraging development sites for employment to come forward and aim to create to a environment for increased investment and job creation. For example, Strategic Policy EMP1 includes '<i>ensuring availability of a range of workspaces and unit sizes, including 'affordable workspace', start-up space, co-working space and 'grow-on' space as part of planning applications for mixed and employment uses</i>'. There is some uncertainty as later iterations of the Plan must be more specific in terms of the amount of employment to be provided and the contribution that development proposals will make to those.</p> <p>Policy EMP6 will contribute to this objective by seeking to secure affordable workspace.</p> <p><b><u>Mitigation</u></b></p> <p>The Plan should make explicit the anticipated contribution to employment from strategic sites and other development.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++/?	++/?	++/?	++/?	++/?	++	++/?

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	Policy EMP6: Providing Affordable Workspace	
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b><u>Likely Significant Effects</u></b></p> <p>These policies do not directly contribute to this SA objective. However, Policy EMP5 requires the redevelopment or upgrading of designated employment areas to be appropriate to its surroundings and protect the amenity of surrounding properties, resulting in an indirect minor positive effect on this SA objective due to amenity protection from noise, vibration and pollution. Policy EMP6 could contribute to this objective by encouraging mixed use developments that include affordable workspace. There is no clear relationship the other Employment policies and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None identified</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~	~	+	+	0
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b><u>Likely Significant Effects</u></b> There is no clear direct relationship between the policies and this objective. However, indirectly, the economy and jobs policies will help to reduce unemployment and improve living conditions through raising wealth levels. This will have positive health impacts given the important association between employment, income and health. Sustainable economic growth will help to have positive health impacts upon all sections of the community.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	+	+	+	+	+	+	+

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	Policy EMP6: Providing Affordable Workspace	
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p><b><u>Likely Significant Effects</u></b></p> <p>Policy EMP5 allows for the redevelopment of sites in Local Industrial Locations provided that the proposed use is compatible. This could include residential development.</p> <p>No relationship with other objectives is identified.</p> <p><b><u>Mitigation</u></b></p> <p>None identified</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>Uncertain if residential development would be compatible with Local Industrial Locations..</p>	~	~	~	~	+/?	~	0
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p><b><u>Likely Significant Effects</u></b></p> <p>These policies seek to concentrate new employment and light industrial uses within highly accessible designated areas, which would support sustainable modal shifts, increase the efficiency of freight transport and directly contribute to this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++	++	++	++	++	++	++





SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	Policy EMP6: Providing Affordable Workspace	
7. Employment: Reduce worklessness and Increase employment opportunities for all residents	<p><b><u>Likely Significant Effects</u></b></p> <p>These policies encourage the development of employment floorspace and identify designated employment areas where specific types of employment uses should be directed to, whilst seeking to prevent the loss of employment space within designated areas and ensure that new employment developments are compatible with existing and surrounding uses. As such all of these policies support the overall delivery of new employment opportunities, however they do not explicitly address issues regarding worklessness or barriers to employment within the local population.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>It is assumed that whilst not included within these policies, other Local Plan policies and other initiatives, e.g. Skillsmatch would address worklessness and barriers to employment for local people.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++	++	++	++	++	++	++

SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	Policy EMP6: Providing Affordable Workspace	
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b><u>Likely Significant Effects</u></b></p> <p>These policies encourage the development of employment floorspace and identify highly accessible areas where specific types of employment and light industrial uses should be directed to, whilst seeking to prevent the loss of employment or industrial space. As such the policies directly contribute to this SA objective through safeguarding existing and supporting new employment and businesses/light industrial developments in appropriate locations.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	++	++	++	++	++	++	++



SA Objective	Commentary	Draft Policies						Cumulative Effect of the Draft Policies
		Strategic Policy EMP1: Investment and Job Creation	Strategic Policy EMP2: Employment locations	Policy EMP3: Providing New Employment	Policy EMP4: Protecting Employment	Policy EMP5: Redevelopment Within the Borough's Employment Areas	Policy EMP6: Providing Affordable Workspace	
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p><b><u>Likely Significant Effects</u></b></p> <p>These policies do not address issues within this SA objective regarding density, townscape, cultural heritage or landscape matters. However, Strategic Policy EMP2 notes that Preferred Office Locations are suitable for employment uses with large floor plates and Policy EMP3 requires employment proposals outwith designated areas, Town Centres and Primary Routes would contribute towards integrated place making. These policies indirectly contribute to this SA objective by seeking to ensure that employment land uses are appropriate for their built environment surroundings.</p> <p>There is no clear relationship between the other Employment policies and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	+	+	~	~	~	0
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p><b><u>Likely Significant Effects</u></b></p> <p>There is no clear relationship between these policies and this SA objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	~	~	~	~	~	~	0







### SA of Draft Policies: Design and Historic Environment

SA Objective	Commentary	Policies											Cumulative Effect of the Draft Policies	
		Strategic Policy DH1 : Good Design. Local Character	Strategic Policy DH2: Attractive and Safe Streets Spaces and Public Realm	Policy DH3: The Historic Environment	DH4: World Heritage Sites	DH5- Building Heights	DH6- Density	DH7 - Amenity	DH8 - Noise Pollution	DH9 - Overheating	DH10 - Shopfronts	DH11- Advertisements and Hoardings		DH12 - Telecommunications
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	<p><b>Likely Significant Effects</b></p> <p>Strategic Policy DH1 requires development proposals to demonstrate good design principles, partly to protect and enhance amenity – promoting mental and physical well-being of occupants/users of the site and neighbouring properties. DH1 also includes criteria to ensure that development proposals, open spaces and public realm are accessible and sustainable. These factors indirectly contribute to this SA objective through ensuring access to high quality places for a range of demographic groups, which could promote social cohesion and integration and reduce social exclusion.</p> <p>Strategic Policy DH2 requires development proposals to follow a street hierarchy which prioritises pedestrians and supports both the movements and place functions of streets. This could enhance social interactions within neighbourhoods, resulting in an indirect positive effect on this SA objective through improved social cohesion and integration.</p> <p>Policies DH6 DH7,DH8 and DH9 make a minor positive contribution seek to ensure that all communities enjoy a comfortable living environment.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	+	+	?	?	?	+	+	+	+	?	?	?	+
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	<p><b>Likely Significant Effects</b></p> <p>Strategic Policy DH1 and Strategic Policy DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design. This would ensure that developments provide permeable, multi-functional and connecting street infrastructure and high quality public realm provision, such that these policies directly contribute to this SA objective.</p> <p>Policy DH1 also sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks.</p> <p>Policy DH2 also requires proposals to embed the principles of Secured by Design and to incorporate high quality public realm. These criteria would directly promote</p>	++	++	?	?	?	+	++	++	?	++	++	++	++



SA Objective	Commentary	Policies											Cumulative Effect of the Draft Policies	
		Strategic Policy DH1: Good Design, Local Character	Strategic Policy DH2: Attractive and Safe Streets Spaces and Public Realm	Policy DH3: The Historic Environment	DH4: World Heritage Sites	DH5: Building Heights	DH6: Density	DH7 - Amenity	DH8 - Noise Pollution	DH9 - Overheating	DH10 - Shopfronts	DH11 - Advertisements and Hoardings		DH12 - Telecommunications
	<p>access to high quality open spaces, facilitate public realm improvements, and enhance both perceptions of and actual safety and security, resulting in a directive contribution to this SA objective.</p> <p>Increased densities can impact on individual quality of life through increased disturbance and disruption. Policy DH6 cross references the density ranges in the London Plan and requires that development will exceed minimum design standards where higher densities are proposed. A minor positive effect is therefore anticipated.</p> <p>Policy DH7 encourages the creation of attractive and useable open spaces and requires development proposals to avoid unacceptable nuisances and pollution impacts, which would directly contribute to this SA objective through increasing access to open space and mitigating amenity impacts from development.</p> <p>Policy DH8 directly contributes to this SA objective through safeguarding noise sensitive receptors from adverse noise impacts resulting from development proposals.</p> <p>Policies DH10 and DH11 require shopfronts, signage and advertising proposals to make a positive contribution to the public realm, which directly contributes to this SA objective through protecting and enhancing the quality of the public realm. Similarly policy D12 requires proposed telecommunications infrastructure to integrate with its surroundings, which would safeguard the quality of the public realm and therefor indirectly contribute to this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>Strategic policy DH1 could highlight the need for all development to incorporate designing out crime principles.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>													
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	<p><b>Likely Significant Effects</b></p> <p>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 provide opportunities to participate in recreational activities, encourage active travel and increase social interactions, all of</p>	++	+	~	~	~	+	++	++	++	~	~	~	++







SA Objective	Commentary	Policies											Cumulative Effect of the Draft Policies			
		Strategic Policy DH1: Good Design, Local Character	Strategic Policy DH2: Attractive and Safe Streets Spaces and Public Realm	Policy DH3: The Historic Environment	DH4: World Heritage Sites	DH5 - Building Heights	DH6 - Density	DH7 - Amenity	DH8 - Noise Pollution	DH9 - Overheating	DH10 - Shopfronts	DH11 - Advertisements and Hoardings		DH12 - Telecommunications		
	None identified.															
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	<p><b>Likely Significant Effects</b></p> <p>Strategic Policy DH1 and Strategic Policy DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design, whilst Policy DH5 sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks and include high quality public realm. These policies would improve the appearance of neighbourhoods and enhance the quality of the built environment, which would be likely to support investment by existing and new businesses, resulting in local business growth, wider economic growth and regeneration of neighbourhoods in need of socio-economic renewal. The policies would therefore have a major positive effect on this SA objective.</p> <p>DH5 directs Tall Building proposals to designated Tall Building Clusters. This could help create clusters of firms that desire such a location, it is uncertain how relevant this would be as a locational factor so a minor positive effect has been recorded.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>	++	++	∩	∩	+	∩	∩	∩	∩	∩	∩	∩	∩	+	
9. Town Centres: Promote diverse and economically thriving town centres.	<p><b>Likely Significant Effects</b></p> <p>The policies identified seek to secure an attractive public realm and avoid noise pollution. They will help achieve this objective by encouraging an attractive built environment that will help maintain the vitality of town centres.</p> <p>There is no clear relationship between other policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p>	++	++	∩	∩	∩	∩	∩	++	++	∩	∩	∩	∩	∩	++

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

SA Objective	Commentary	Policies											Cumulative Effect of the Draft Policies	
		Strategic Policy DH1: Good Design, Local Character	Strategic Policy DH2: Attractive and Safe Streets Spaces and Public Realm	Policy DH3: The Historic Environment	DH4: World Heritage Sites	DH5- Building Heights	DH6- Density	DH7 - Amenity	DH8 - Noise Pollution	DH9 - Overheating	DH10 - Shopfronts	DH11- Advertisements and Hoardings		DH12 - Telecommunications
	<p>Policy DH7 encourages the creation of attractive and useable open spaces. Through the promotion of open space provision to meet identified needs the policy would directly contribute to and have a major positive effect on this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>													
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	<p><b>Likely Significant Effects</b></p> <p>Strategic Policy DH1 requires development proposals to demonstrate good placemaking principles, including through the minimisation of energy usage. As such the policy would contribute to and have a minor positive effect on this SA objective.</p> <p>Strategic Policy DH1 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 ensure the accessibility of developments by active and sustainable travel modes, reducing car travels need and associated greenhouse gas emissions. Therefore the policy would indirectly have a minor positive effect on this SA objective</p> <p>Strategic Policy DH2 requires development proposals to follow a street hierarchy which prioritises pedestrians and supports both the movements and place functions of streets. This would ensure the accessibility of developments by active and sustainable travel modes, reducing car travels need and associated greenhouse gas emissions. Therefore the policy would indirectly have a minor positive effect on this SA objective</p> <p>Policy D4 sets out criteria to ensure that development proposals preserve or enhance recognised heritage assets, including their fabric. This would provide support for development proposals which seek to reduce flood risks on the historic environment and therefore could indirectly contribute to this SA objective.</p> <p>Policy DH9 requires development proposals to be designed to avoid overheating and excessive heat generation, as well as to minimise air conditioning needs. This would minimise energy usage, minimise urban heat island effects from building</p>	+	+	?	+	?	?	?	?	++	?	?	?	+

SA Objective	Commentary	Policies											Cumulative Effect of the Draft Policies		
		Strategic Policy DH1: Good Design, Local Character	Strategic Policy DH2: Attractive and Safe Streets Spaces and Public Realm	Policy DH3: The Historic Environment	DH4: World Heritage Sites	DH5- Building Heights	DH6- Density	DH7 - Amenity	DH8 - Noise Pollution	DH9 - Overheating	DH10 - Shopfronts	DH11- Advertisements and Hoardings		DH12 - Telecommunications	
	<p>heating/cooling plant and enable developments to adapt to climate related temperature changes. As such the policy would directly contribute to and, at least in respect of climate change adaptation, have a major positive effect on this SA objective.</p> <p>There is no clear relationship between the other Design and Historic Environment policies and this SA objective.</p> <p><b>Mitigation</b></p> <p>None required.</p> <p><b>Assumptions</b></p> <p>None identified.</p> <p><b>Uncertainties</b></p> <p>None identified.</p>														
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	<p><b>Likely Significant Effects</b></p> <p>Strategic Policy DH1 requires development proposals to demonstrate good placemaking principles, including through providing a range and mix of high-quality, publicly accessible green spaces, which could also indirectly support increased levels of biodiversity through the creation of new habitats. As such the policy would contribute to and have a minor positive effect on this SA objective.</p> <p>Strategic Policy DH1 also sets out criteria to ensure that proposed developments are attractive, well designed, accessible, connected to both their surroundings and to open space networks and include high quality public realm. This would contribute to this SA objective as the provision of high quality and connected open spaces would generate new high quality and connected habitats which could support increased levels of biodiversity. Consequently this policy would have a major positive effect on this SA objective.</p> <p>Policy DH5 sets out criteria to assess the acceptability of tall building proposals, including specifically a requirement to avoid adverse impacts on biodiversity. This would safeguard ecological interests, although taking account of the narrow scope of this policy in relation to biodiversity, only a minor positive effect on this SA objective is predicted.</p> <p>Policy DH7 encourages the creation of attractive and useable open spaces. This would contribute to this SA objective as new open space provision would generate new habitats and increase people's access to nature. Consequently this policy would have a major positive effect on this SA objective.</p>	+	++	?	?	+	?	++	?	?	?	?	?	?	+





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

